

Appendix B Format for submissions

Submitter	Edward Miller, Researcher at the Centre for International Corporate Tax Accountability and Research (CICTAR)
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Questions	Comments
Q1. Do you agree the Authority should require generators to provide energy margin data?	Yes, it is absolutely imperative.
Q.2 Do you agree with the assessment of the costs and benefit?	I agree that the costs are low and significantly outweighed by the benefit of having this data available.
Q3. Do you agree the proposed notice is preferable to the other options? If you disagree, please explain your preferred option in terms consistency with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010. Is there another means of meeting the objective?	The consistent information sharing approach proposed is better than issuing a s46 request during periods of scarcity. Relying on existing financial statements does not provide the degree of granularity to be able to effectively track margins alongside price changes.
Q4. Do you agree with the criteria regarding who is required to comply with this proposed notice?	At this stage the criteria makes sense, although there may be a case for reducing the threshold over time to better understand the position of smaller generators (noting that these companies will certainly be collecting this information).
Q5. Do you agree that these are the right categories to collect financial information for calculating energy margins?	Yes
Q6. Do you agree that data should be reported by week but submitted monthly? For participants only: Are there any timing issues we should be aware of in regard to the due date?	Yes

Q7. Do you support publishing the information provided, excluding market making costs? If not, why not?	Yes
Q8. Do you have any comments on the drafting of the proposed amendment?	No further comments.