

Decision on collecting energy margin information on an ongoing basis

Decision paper

30/06/2026

Executive summary

The Electricity Authority Te Mana Hiko (Authority) has decided to issue an information-gathering notice under clause 2.16 of the Electricity Industry Participation Code 2010, requiring large generators to provide regular financial data needed to calculate energy margins. Collecting and publishing information on energy margins will improve transparency, strengthen market monitoring, and support confidence in the wholesale electricity market.

This decision follows public consultation. In response to the feedback received from submissions, we have made changes to both the notice and publication approach.

We have made minor changes to the notice, the substantive content of the data required remains unchanged. The most significant change is moving the submission date from the 10th calendar day to the 15th business day of the following month. The definition amendments are intended only to clarify what information we are seeking.

We have also updated our publication approach. Once a month, instead of publishing participant-level data, we will publish data aggregated across generators. We intend to publish the average energy margin (in \$/MWh) alongside the average weekly spot price to provide additional context. This retains the benefit from increased transparency, while reducing the risk of disclosing potentially commercially sensitive information. We will also publish participant-level data each quarter, after engagement with participants.

The Authority may publish participant-level weekly data in circumstances where market confidence is at risk. In this scenario, we would engage with participants on our intention prior to publication so that we could first consider any objections.

Overall, the Authority considers that this approach strikes the right balance between improving transparency and protecting potentially commercially sensitive information.

The notice will strengthen our ability to monitor competitive conditions in the wholesale market, support more timely assessments during periods of stress, and enhance confidence in market outcomes.

In monitoring competition, the Authority will continue to assess whether wholesale prices reflect marginal costs over both the short and long-run, with energy margin information used as complementary evidence to support market monitoring and transparency.

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1 Purpose

- 1.1 The purpose of this paper is to inform industry and stakeholders about the Authority's decision to publish an information-gathering notice under clause 2.16 of the Electricity Industry Participation Code 2010 (Code) to require generators to submit financial information on energy margins.
- 1.2 This paper:
 - (a) sets out the objective of the clause 2.16 notice and the Authority's decision to issue the notice under the Code
 - (b) summarises feedback received on the consultation paper
 - (c) highlights where the final clause 2.16 notice differs from the proposed clause 2.16 notice we consulted on
 - (d) explains the Authority's decision to collect and publish this information
 - (e) sets out the next steps to collect and publish the information.
- 1.3 This decision improves transparency, giving consumers and investors greater confidence in wholesale market outcomes. Sustaining market confidence is vital to encourage investment, support industrial growth and accelerate the transition to electricity from other energy sources.
- 1.4 Note, in this paper, references to 'large generators' mean generators to whom the clause 2.16 notice applies.
- 1.5 This initiative aligns with the Authority's main statutory objective to promote competition, reliable supply, and efficient operation of the electricity industry for the long-term benefit of consumers.

2 Context for the Authority's decision

Objectives and outcomes

- 2.1 The Authority's main statutory objective is to promote competition in, reliable supply by, and the efficient operation of, the electricity industry for the long-term benefit of consumers.
- 2.2 The Authority's statutory functions include undertaking:
 - (a) market facilitation measures (for example, providing education, guidelines, information, and model arrangements), and to monitor the operation and effectiveness of market facilitation measures
 - (b) industry and market monitoring, and carry out and make publicly available reviews, studies, and inquiries into any matter relating to the electricity industry.

Consultation process

- 2.3 On 10 November 2025, we published the consultation paper *Collecting energy margin information*. The consultation paper set out the Authority's proposal to:
 - (a) regularly collect financial information from large generators to calculate their energy margins
 - (b) publish the collected data (excluding market making costs) to improve transparency and support informed decision-making by market participants.
- 2.4 In total, we received nine submissions which have all been published in full on our website.

Table 1: List of submitters and their position

| Submitters | |
|--|------------------|
| 2degrees | Support |
| 350 Aotearoa | Support |
| Contact Energy | Unclear/mixed |
| Edward Miller, Centre for International Corporate Tax Accountability and Research (CICTAR) | Support |
| Electricity Retailers' and Generators' Association of New Zealand (ERGANZ) | Caveated support |
| Genesis Energy | Do not support |
| Meridian Energy | Do not support |
| Major Energy Users Group (MEUG) | Support |
| Nova Energy | Do not support |

3 Background on energy margin data

- 3.1 The energy margin is the difference between the total revenue earned from generating electricity and the total costs incurred. While it does not tell us the actual profit of generators, it provides an indication of the profitability of energy. That is, if energy margins are particularly high (or low) for a short period, it indicates that profits on energy could be particularly high (or low) at that time.
- 3.2 Currently, the Authority does not collect financial data on energy margins from generators on an ongoing basis. However, in August 2024, in response to scarcity conditions and high prices we issued a section 46 request for energy margin data for the period of July 2024 to December 2024, to be provided on a weekly basis. This data was published on our website (excluding market making costs).
- 3.3 The energy margin data was used to test concerns that generators were making excess profits from the high price period. The data showed that the energy margin was lower during this period, which helped address concerns that generators used short term scarcity to increase their own profitability.
- 3.4 This was not the primary analysis used to assess if prices were too high. High energy margins alone would not indicate that high spot prices were inefficient, or that generators were exercising market power. Similarly, the low energy margins observed would not indicate that high spot prices were efficient, or that there was no exercise of market power.
- 3.5 In the short term the Authority assesses whether generators' offers and wholesale prices reflect short-run marginal costs (SRMC) (including opportunity costs and scarcity rents) to evaluate whether wholesale market outcomes are efficient and consistent with workable competition. Short-run marginal cost analysis provides the most direct indicator of whether generation is being dispatched efficiently and whether prices are responding appropriately to underlying supply and demand conditions.
- 3.6 In addition to SRMC analysis, comparisons between average spot prices and the long-run marginal cost (LRMC) are used to assess longer term efficiencies in the wholesale market. In an efficient and competitive market, we would expect the average spot price to tend towards LRMC, consistent with efficient entry and investment decisions over the long term.
- 3.7 Energy margin information complements, rather than replaces, analysis of whether prices are efficient. It provide additional context that can assist the Authority in understanding wholesale market outcomes, impacts of hedging positions, and in identifying patterns that may warrant closer scrutiny.

4 Submissions have not changed our decision to issue the clause 2.16 notice

- 4.1 Submitters expressed mixed views on whether there was a need to collect energy margin data. Some submitters fully supported the proposal, while others either did not support it or proposed changes in order to support.
- 4.2 In support, MEUG said “The publication of this information during August–December 2024 was useful market information for electricity sector stakeholders... We endorse the Authority for taking the necessary steps to gather this information formally, on an ongoing basis”.
- 4.3 Generators were less supportive of the proposal, for example, Nova said “While Nova supports the Authority’s broader objective of strengthening market monitoring and transparency, we do not consider an ongoing energy margin reporting regime to be justified on the evidence presented.”

Our response

- 4.4 The Authority continues to consider there is a strong benefit in collecting the energy margin data. However, we have adjusted the notice in response to the feedback received.

Proposal about which generators the notice applies to

- 4.5 We proposed the clause 2.16 notice apply to traders who are generators and who, in any month of the previous financial year, sold more than 100 GWh of electricity to the clearing manager.
- 4.6 This threshold was intended to capture generators who could hold market power even for a short period.
- 4.7 We stated that this definition would place requirements on Meridian Energy, Genesis Energy, Mercury NZ and Contact Energy (including Manawa Energy Ltd) and Nova Energy.

Submitters' feedback mostly agreed the right participants were included

- 4.8 Two submitters agreed that the disclosure requirements should apply to all large generators with significant or substantial market power. However, Nova said “The 100 GWh threshold appears arbitrary and set at a level significantly below any reasonable proxy for market power... it would capture Nova, despite our relatively small size and market share of well under 5%.”
- 4.9 Two submitters argued that the criteria should be broader. Meridian said, “obligations should be extended to as wide a pool of participants as possible, including wholesale market purchasers.”. CICTAR also broadly agreed with the criteria but suggested it be expanded in future.

Our response

- 4.10 We have considered Nova’s concern that the 100 GWh threshold is below any reasonable proxy for market power. We acknowledge that generators producing only 100 GWh may not often be able to impact market outcomes. However, in periods of high stress, even 100 GWh of energy could materially impact market outcomes, which can increase the market power of smaller generators. As we want to monitor changes in behaviour then it is necessary to include these generators in the clause 2.16 notice.
- 4.11 We do not consider including all wholesale market purchasers is necessary to achieve the desired outcomes, though we may review the criteria in future.

We proposed reporting weekly data

- 4.12 We proposed that the financial data reported should be weekly data, with each week corresponding to a week starting Sunday.

Submitters were split on reporting weekly or monthly

- 4.13 Two submitters (CICTAR and 350 Aotearoa) agreed with reporting weekly data and another two submitters (2degrees and MEUG) did not directly comment on data granularity, although they did support the proposed collection regime.
- 4.14 Three generators and ERGANZ argued that the granularity should be monthly instead of weekly, stating that some weekly data would have to be based on estimates. There were also concerns on how to report for weeks which fell over two months- an issue which monthly data would eliminate. Meridian did not directly comment on providing weekly data.

Our response

- 4.15 We continue to prefer the granularity of weekly data. Despite some estimations, weekly reporting remains important for assessing energy margins during short term conditions. For example, the market shifted substantially between early August 2024, when lake levels were low and gas supply short, and the end of August, when a gas deal increased gas supply and rainfall had relieved dry conditions.

We proposed the data be submitted on the 10th of each month

- 4.16 We proposed that participants submit data once a month, by 5pm on the 10th of the month. This is a change from the section 46 information gathering notice, which required data to be submitted on the following Wednesday of each week.

Submitters wanted a later submission date each month

- 4.17 Submitters generally agreed with submitting data once a month.
- 4.18 Five submitters, ERGANZ and the four generators, suggested that the 10th of the month was too early to submit reliable data. ERGANZ said “Shifting the submission deadline to Business Day 15 would better align with existing settlement and reporting cycles and improve data quality without undermining the usefulness of the information for the Authority.”
- 4.19 Two of the generators stated that the 10th business day would be the earliest they could report and the others stated the 15th business day was preferred.

Our response

- 4.20 Having considered submissions, we accept that a later submission date is preferable and agree to update the submission date of the notice to the 15th business day of the month.

...

Submitters asked for clarity of definitions

- 4.21 Several submitters identified data definitions where additional clarification was needed or had suggestions and questions about which data should be included in the disclosure. Submitters pointed out that addressing these points would ensure that reporting was consistent between generators.
- 4.22 The following table summarises feedback from submitters regarding the definitions. This is a summary only and is not intended to be comprehensive. Full submissions are published on the Authority's website.

Table 2: Submitters feedback on definitions

| Ref | Heading | Descriptor | Definition | Genesis | Contact | Nova | ERGANZ | 350 Aotearoa |
|-----|---------|--------------------|---|---|---------|---|--|---|
| EM1 | Date | Week ending | The last day of the week to which this data applies. This should be a Saturday, with data aligned to the Sunday to Saturday week. | <p>We cannot reliably break many cost items down by week. To produce weekly figures, we will need to allocate monthly costs based on daily volumes where available, or use pragmatic even-split rules.</p> <p>We therefore recommend the notice/guidance [acknowledge] that weekly [energy margins] involve material estimation and may not be directly comparable across participants.</p> | | <p>Retail revenue will be estimated weekly, as reconciliation volumes are only available monthly and subject to wash-ups.</p> <p>Weekly data may create misinterpretation risk if published without context, particularly for smaller portfolios.</p> <p>The Authority should clarify how partial weeks (weeks straddling two months) are to be handled within the monthly reporting cycle.</p> | While accurate monthly data can be provided on this timetable, some members have indicated that the requested weekly breakdowns will not be readily available. In those cases, participants would simply divide monthly figures by the number of days in the month, which is unlikely to reflect actual weekly patterns. We recommend the Authority reconsider whether weekly breakdowns are necessary to achieve its stated objectives. | |
| EM2 | Gen_rev | Generation revenue | Total revenue from selling generation on the wholesale market, to the closest dollar | | | | | Separate reporting of thermal vs renewable generation revenues and costs: The current categories aggregate all generation together, obscuring the true profitability of fossil fuel generation during scarcity periods. |

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|-----|-----------|------------------------------|---|--|--|--|--|---|
| | | | | | | | | Disaggregated data would: <ul style="list-style-type: none"> ● Reveal whether thermal generation earns excess profits during scarcity ● Show if gentailers have incentives to maintain fossil fuel capacity ● Support evidence-based policy on phasing out thermal generation ● Enable public assessment of whether "dry year" pricing reflects actual costs or market power. |
| EM3 | AM_rev | Ancillary market net revenue | Net revenue from buying and selling ancillary services (eg, reserves, frequency keeping), to the closest dollar | | | | | |
| EM4 | Sales_rev | Sales revenue | Sum of fixed price sales and purchases and premiums, both physical and financial, to the closest dollar. | We... ask the Authority to explain how EM4 is intended to align with, and differ from, existing external reporting of electricity revenue, and minimise duplication or inconsistency; and consider limiting EM4 to the minimum set of revenue categories genuinely necessary for competition monitoring, leaving more detailed segment-level analysis to established financial reporting channels; | | Weekly data will necessarily rely on estimates, particularly for retail revenue, because reconciliation volumes are only published monthly and are themselves subject to wash-ups. Nova raised this point during the 2024 disclosure process. | | |

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|--------------|-----------|-------------------------|---|--|--|--|--|--|
| EM5 | Gen_costs | Direct generation costs | Cost of generating, including actual cost of fuel. Excludes the opportunity cost of water, to the closest dollar. | The draft notice defines EM5 as "cost of generating, including actual cost of fuel," but explicitly excludes the opportunity cost of water for hydro generators. Thermal portfolios, including Genesis, will report large, volatile fuel costs for gas and coal, while hydro portfolios report minimal or zero fuel costs. Accordingly, we propose that the Authority limit EM5 to a narrow set of direct cash costs. | Whether we should adopt a 'mark to market' or an 'average purchase cost' treatment for fuel such as gas. This is particularly relevant for generators with access to thermal storage. An accounting treatment would see expensive fuel enter storage, and much cheaper "average cost" fuel used for generation. We consider that this can be misleading in times of market stress. | | The definition of generation costs in EM5 explicitly excludes the opportunity cost of water, but does not provide a directive on how to value other fuel sources, particularly thermal fuel. ...different generators could legitimately choose to use purchased cost... or use mark-to-market cost...These two approaches can result in vastly different reported margins for identical physical generation and contract positions... There is also scope for divergent treatment of transmission costs... | Separate reporting of thermal vs renewable generation revenues and costs: The current categories aggregate all generation together, obscuring the true profitability of fossil fuel generation during scarcity periods... Disaggregated data would: <ul style="list-style-type: none"> ● Reveal whether thermal generation earns excess profits during scarcity ● Show if gentailers have incentives to maintain fossil fuel capacity ● Support evidence-based policy on phasing out thermal generation ● Enable public assessment of whether "dry year" pricing reflects actual costs or market power |
| EM6 | SE_costs | Spot electricity costs | Costs that arise as a result of physical and financial contract exposure to spot prices, to the closest dollar | In addition, we request clearer guidance on:(a) whether EM6 includes only physical spot purchases or also derivative settlements; and (b) how EM6 interacts with EM4 to avoid double-counting particular contract types | | | | |
| EM7 | MM_costs | Market making costs | Costs that arise as a result of market making requirements, to the closest dollar | | | | | |
| Other | | | | Potential inconsistency in classification of transmission charges, EA | Whether costs such as EA levies are included. These were excluded | The Authority may wish to allow (or require) supporting notes to explain | The data the Authority proposes to collect excludes key expenses | Capital expenditure and dividend data: To directly address the core finding of |

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| | | | levies, market fees and ancillary services...We recommend that the Authority provide explicit guidance on these items, tested with industry, before finalising either section 46 templates or a clause 2.16 notice. | from the cost of generation in the 2024 disclosures, however, we consider this a relevant cost in assessing energy margins. What treatment is expected of transmission costs... | estimation methodologies or unusual data points. | for electricity generators, such as interest, depreciation, tax, Electricity Authority levies and operational costs. | our research—that gentailers paid \$2.41 in dividends for every dollar invested in plant, property and equipment—the Authority should collect monthly data on: <ul style="list-style-type: none"> ● Capital expenditure on new renewable generation capacity ● Dividends declared or paid to shareholders ● This would enable real-time monitoring of whether profits are being reinvested appropriately or extracted excessively, particularly during high-margin periods. |
|--|--|--|---|---|--|--|--|

Our response

4.23 We agree that clear definitions are important to ensure consistent disclosures and enable accurate comparisons between participants.

4.24 After reviewing the comments from submitters, we have made the following revisions to the definitions. Changes are also in Italics.

Table 3: Proposed changes to definitions

| Ref | Heading | Descriptor | Old definition | New Definition | Reasoning |
|-----|---------|--------------------------|---|--|---|
| EM1 | Date | Week ending | The last day of the week to which this data applies. This should be a Saturday, with data aligned to the Sunday to Saturday week. | The last day of the week to which this data applies. This should be a Saturday, with data aligned to the Sunday to Saturday week. <i>Include all weeks in which the last day falls into the reporting month.</i> | We considered monthly reporting instead of weekly reporting, and acknowledge this would reduce the requirement on generators to potentially estimate the figures to change from a monthly to a weekly figure. However, we view monthly data as not granular enough for monitoring the outcome of particular conditions, such as scarcity. We have provided additional information to ensure only data from the reporting month (or earlier) is requested. |
| EM2 | Gen_rev | Generation revenue | Total revenue from selling generation on the wholesale market, to the closest dollar | Total revenue from selling generation to the clearing manager on the wholesale spot market, to the closest dollar. | Minor change. We do not intend to ask generators to report revenue by thermal and renewable generation. |
| EM3 | AM_rev | Ancillary market revenue | Net revenue from buying and selling ancillary services (eg, reserves, frequency keeping), to the closest dollar | Net revenue from buying and selling ancillary services (eg, reserves, frequency keeping), to the closest dollar. | No change requested. |

| | | | | | |
|------------|-----------|-------------------------|--|--|--|
| EM4 | Sales_rev | Net sales revenue | Sum of fixed price sales and purchases and premiums, both physical and financial, to the closest dollar | Sum of fixed price sales and purchases and premiums, both physical and financial, to the closest dollar. <i>Include sale revenue of electricity from mass market, commercial and industrial retailing, net premiums and fixed price costs from ASX and OTC contracts.</i> | We have added additional information to provide clarity of which costs should be included in EM4 and which in EM6. |
| EM5 | Gen_costs | Direct generation costs | Cost of generating, including actual cost of fuel. Excludes the opportunity cost of water, to the closest dollar | Cost of generating, including <i>actual purchase cost of fuel, to the closest dollar. This excludes transmission costs, levies and opex costs, the opportunity cost of fuel, such as water values or 'mark to market' fuel prices.</i> | Our intention is to capture the actual cost of purchasing fuel. Opportunity costs of fuel can be calculated by observing current fuel prices, and the Authority has models to estimate the opportunity cost of water. If additional information on opportunity costs is needed these can be requested separately to this notice. We do not intend to ask generators to report costs by thermal and renewable generation. |
| EM6 | SE_costs | Spot electricity cost | Costs that arise as a result of physical and financial contract exposure to spot prices, to the closest dollar | Costs that arise as a result of physical and financial contract exposure to spot prices, to the closest dollar. <i>This includes the cost of buying electricity from the clearing manager to cover for mass market, commercial and industrial retail contracts, net exposure to the spot price from ASX contracts and OTC contracts.</i> | We have added additional information to provide clarity of which costs should be included in EM4 and which in EM6. |
| EM7 | MM_costs | Market making costs | Costs that arise as a result of market making requirements, to the closest dollar | Costs that arise as a result of market making requirements, to the closest dollar | No change requested |

4.25 Submitters also asked for clarity on reporting transmission costs, levies and opex costs. We have decided not to update the definitions to include these costs. We have added additional information to the final clause 2.16 notice to make this clear and will ensure this is flagged with any data that is published. While it is possible that some generators included transmission costs or levies in the 2024 data required under the section 46 information gathering notice, we do not have evidence that any generators were including these costs based on the information provided both at the time and in this consultation.

4.26 350 Aotearoa also requested we should collect monthly data on capital expenditure on new renewable generation capacity and dividends declared or paid to shareholders. The Authority is already collecting data on capital expenditure through [a clause 2.16 notice on final cost of investment](#), with data to be reported within one month of commissioning any new generating station on the transmission network (or on the distribution network if larger than 5MW). Dividends declared and paid to shareholders are already publicly available for listed companies.

5 Submissions have changed our view on how we will publish data

We proposed publishing data, excluding market making

- 5.1 We proposed to publish most of the collected information, excluding market making costs, in a similar manner to how we published the energy margin data collected under the section 46 information-gathering notice in 2024.

Support for publication tempered by concerns about commercial sensitivity

- 5.2 Three submitters supported publication of the data, with 350 Aotearoa suggesting that market making costs should also be published. MEUG said “The publication of this information during August–December 2024 was useful market information for electricity sector stakeholders”.
- 5.3 ERGANZ and Nova highlighted concerns with publishing the data and recommended the Authority consider publishing aggregate or anonymised data, or only after an appropriate time lag. ERGANZ said that “...publication of financial information must respect commercial sensitivities and avoid undermining competition” while Nova said: “For smaller participants like Nova, weekly revenue and cost movements can make commercial positions unusually transparent.”
- 5.4 Meridian and Genesis disagreed with the publication of the data. Meridian said “The Authority’s objectives... can be met through collection of this information and undertaking appropriate review and analysis. There is no clear need for this information to be published.” Genesis was concerned that commercially sensitive information could be inferred from using a combination of this disclosure and other information and would only support aggregated data being published.

We have agreed to make some changes to proposed publication of this data to address concerns

- 5.5 We want to balance increased transparency with potential commercial sensitivity concerns. We note the concerns that publishing too much information could in some circumstances inadvertently be detrimental to competition where commercially sensitive information can be inferred from disclosure of this data.
- 5.6 We have therefore considered what the current appropriate level of publication is to provide the benefit to competition by increasing transparency without compromising potentially sensitive information. Our decision is that shortly after the data is submitted, we will publish data aggregated across all generators. We intend to report the average energy margin by \$/MWh and to include the average weekly spot price to help provide additional context.
- 5.7 The Authority will publish participant data on a quarterly basis. This would provide a time lag which should reduce any sensitivity of the data. This will also provide us with time to consult with each participant prior to publishing the data to ensure that the data is correct, and with the appropriate disclaimers where necessary.
- 5.8 The Authority reserves the right to publish weekly information by participant in the event of decreased confidence in the market. We would do this in circumstances, such as the events in August 2024 which resulted in the initial collection and publication of energy margin data. We would engage with participants prior to publication of the data to discuss any objections, before making a decision on this.

6 Benefits, costs and alternatives to the clause 2.16 notice

- 6.1 Clause 2.18(1) of the Code sets out that before publishing a notice under clause 2.16 the Authority must provide the following to the participant to whom the proposed notice applies:
- (a) the proposed notice
 - (b) the Authority's purpose in setting the information requirements in the proposed notice; and
 - (c) the Authority's assessment of the likely benefits of the Authority obtaining the information required in the proposed notice and whether those benefits are likely to outweigh the likely costs.
- 6.2 The consultation paper set out the Authority's preliminary view that the benefits of the proposed information request are expected to outweigh the costs.

Submitters view on cost and benefits

- 6.3 Edward Miller (CICTAR) said: "I agree that the costs are low and significantly outweighed by the benefit of having this data available."
- 6.4 While ERGANZ said "...regular reporting will create an additional compliance obligation for participants...it is important that the Authority considers the cumulative impact of these obligations on participants and, ultimately, consumers."
- 6.5 Genesis said "The Authority asserts that benefits 'significantly outweigh' costs but provides no quantitative analysis..."

Submitters suggested alternative

- 6.6 Genesis said: "the targeted section 46 request demonstrated that the Authority can obtain the data it needs, at the desired frequency and granularity, in a risk-responsive way," and similarly Nova said: "A hybrid approach could combine existing public financial disclosures for baseline transparency with more detailed weekly reporting only during periods of scarcity or for participants...[with] potential to influence wholesale outcomes."
- 6.7 Meridian considered a 'do nothing' approach would be preferable.
- 6.8 2degrees suggested the proposal did not go far enough and: "While we consider that it is a good idea.... [the Authority] should also consider what other information it needs to have better clarity about the extent of market power and how it is exploited in the electricity market." and expressed support for financial separation of retail and wholesale businesses.

We have considered the alternative options

- 6.9 The Authority considers that a 'do nothing' approach would not allay concerns and may increase the perception that prices in the market are not competitively set.
- 6.10 The Authority has considered continuing to use section 46 information-gathering notices during periods of scarcity. One concern is that there is a time delay between the start of scarcity conditions and the collection and publication of the data. This approach also reduces the benefit of transparency as it does not allow comparisons with other market conditions, and to track how energy margins change over time.

The Authority's view remains that the benefits of the information request are greater than the costs

- 6.11 The Authority considers that the likely benefits of this approach outweigh the likely costs.

- 6.12 We acknowledge that this approach does place compliance obligations on the large generators. However, our view remains that this is relatively small as participants already hold the data.
- 6.13 Submissions highlighted the potential for harm to competition if commercially sensitive information was identifiable. For this reason, we have changed our approach to publish aggregated data shortly after submission, and to publish participant-level data only after a time lag and fact-checking with the submitters.
- 6.14 Publishing energy margin data, alongside analysis of market outcomes, will increase transparency in the electricity market and improve understanding of how wholesale prices do or do not impact profitability, thereby supporting confidence in the wholesale market.
- 6.15 Collecting energy margin data will complement, rather than substitute for, the Authority's core analysis of whether wholesale prices reflect marginal costs over both the short and long-run. Energy margin data will be particularly useful for monitoring outcomes during short-term events — such as periods of scarcity, as well as monitoring longer term trends. This will help inform robust, data-driven policy decisions.

7 Attachments

- 7.1 The following appendices are attached to this paper:
- **Appendix A** Energy Margin Information Notice
 - **Appendix B** Energy Margin Notice Information changes

AI Note: Microsoft Copilot was used for editing. The Authority retains full responsibility for all analysis, conclusions, and decisions.