

Response to "improving visibility of competition..."

Bryan Leyland, Consulting Engineer

Q1. Do you agree with the Authority's proposal to expand the scope of the proposed notice to collect information from non-integrated generators?

No! All the authority claims is that cost will be at would be moderate but it doesn't outline the costs and failed to put a number on the benefits. It seems to me that the cost of issuing the questionnaires every three months, the cost to the recipient of the time needed to fill in a document – often simply reporting “no new data.” will be quite high both in time and a sense of frustration. Chasing up those who do not submit will take up a lot of the Authorities staff time. But the big question is "where are the benefits". I simply cannot work out why it should produce financial savings for the generators or for consumers in general. Surelyt hat should be included in the report.

Q2. Do you agree with the Authority's proposal to capture sell requests in addition to buy request

No! Where is the benefit in dollar terms

Q3. Do you agree with the Authority's other changes to the proposed notice listed in table 2?

No! Where is the benefit in dollar terms to the industry and the consumers?

General comments

This seems to be a bureaucratic effort to collect data on the basis that somebody believes that will produce benefits but without identifying the costs and benefits and, having done so, proceed or not depending on the answer. If the answer is positive, then the cost benefit analysis should have been included in this paper. And, probably, the previous one.

I am part owner of a power station that sells all its output on the spot market. I am still not clear whether or not there is any useful information we could provide other than the data from the export meter which is now dead remotely and could easily and cheaply be provided. But what would you do with it? Would it really be useful? If so, what would the benefit be?

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