



Genesis Energy Limited  
Level 6  
155 Fanshawe Street  
PO Box 90477  
Victoria St West  
Auckland 1142  
New Zealand

T. 09 580 2094

20 September 2024

**To:** The Electricity Authority

**Email:** [info@ea.govt.nz](mailto:info@ea.govt.nz)

### Genesis supports generation investment transparency

Genesis Energy Limited (**Genesis**) welcomes the opportunity to comment on the Electricity Authority's (**the Authority**) *Improving visibility of generation investment: clause 2.16 information notices* consultation paper. We support the Authority's work to progressively increase transparency of generation investment through enhanced data collection and publication. In general, it will be important to design any clause 2.16 notice in such a way as to strike a good balance between improved data (benefits) and administrative costs to participants.

The benefits of the proposal will depend on the quality and comparability of the data inputs provided to the Authority. We recommend the Authority ensure it has sufficient resourcing, processes and templates for data standardisation and quality assurance. Otherwise, there is a risk of inconsistency of raw data inputs undermining the usefulness of the information provided. As noted in the paper, it will also be critical to ensure there are adequate, robust protections for commercially sensitive information. See below responses to specific consultation questions.

Yours sincerely,

A handwritten signature in black ink that reads "Mitchell Trezona-Lecomte".

Mitch Trezona-Lecomte

**Senior Advisor, Government Relations and Regulatory Affairs**

## Response to consultation questions

Question	Genesis response
<p>Q4. Do you have any comments on the proposal to require generators to provide cost information through a clause 2.16 notice? Do you have any comments on the specific information proposed to be collected in the clause 2.16 notices?</p>	<p>Genesis supports the initiative by the Authority, but notes the following considerations:</p> <ul style="list-style-type: none"> <li>• As noted, it will be critical to ensure that the data is of high value, integrity, and is standardised.</li> <li>• The Authority may want to consider to request information at final investment decision and commissioning to build a record how LCOE is tracking over time for projects.</li> <li>• How will the Authority address limited availability of input data – certain technologies will only have a few projects achieving commissioning?</li> <li>• Will the Authority include repowering projects of existing generation as well?</li> </ul>
<p>Q5. Do you agree that the appropriate time to collect cost information is when new generation is commissioned, or whether it should be earlier in the development process?</p>	<p>See above.</p>
<p>Q6. Do you agree with the Authority’s proposal to aggregate some information provided by Transpower to assess the status or stage of projects, and do you have any comments on the breakdown of the proposed stages?</p>	<p>Yes, this should be aggregated as it will involve commercially sensitive information. We would like to understand more about how the Authority will protect commercially sensitive information.</p>
<p>Q7. Do you agree the benefits of the proposed clause 2.16 notices outweigh their costs? If not, what area(s) of the Authority’s preliminary assessment of benefits and costs do you disagree with?</p>	<p>As noted, the quality of the data inputs and published information will determine the level of benefits from the proposed notices.</p>

