

Viridian Power and Energy's Response to the Consultation on Disclosure of Information to Final Customers by Suppliers

Introduction

VP&E welcome the CER's consultation on disclosure of information to final customers by suppliers as an implementation of the Electricity Directive (2003/54/EC). We recognise the efforts of the SSA in providing a methodology for calculating the fuel mix of suppliers.

Employing a similar methodology to Great Britain for the calculation of environmental impacts could prove useful in the All-island Single Electricity Market (SEM) when it comes to harmonising environmental reporting methodologies in NI and ROI. This presupposes that NI will adopt a similar approach, and a combined co-ordinated approach would be helpful at this stage.

Fuel Mix Calculation

VP&E support the CER's high level principle that the metered generation for each defined fuel source is used in determining the fuel mix for each supplier.

CO2 Emissions

The reported emissions of CO2 should reflect the actual CO2 emissions of the underlying fuels and generators, correctly representing the efficiency of the conversion of fossil fuels to electricity generation and highlighting the benefits of renewable generation. The reports should transparently and clearly reflect the Carbon footprint of the supplied energy to customers.

Whilst the mechanism selected does not fully represent the underlying efficiencies of the individual specific bilateral generator contracts, VP&E support the proposed methodology in the interests of a simple, pragmatic approach which could easily be adapted to work under the SEM.

Interconnection with NI and GB

Some further consideration for the treatment of imports from GB may be required. Energy from GB can currently be transited through NI into ROI. Under the current BETTA arrangements energy is traded bilaterally in GB, with a balancing market. In the light of this how would trades from GB be treated with regard to fuel mix? Additionally, how would the sources of energy from NI be monitored? Appendix A outlines assumptions around these issues in that "North-South trade (Imports) fuel mix can be determined ex-ante and will be approved by the Commission" but it isn't clear how this is to be done.

Supply Companies Operating under Multiple Licences

It is unclear how companies with Green, Brown and CHP licences will report under the proposals. It is also unclear how this situation would be handled in terms of the provision of promotional materials to customers.

Uranium and Thorium in Waste from Coal Plants

In the interests of equality of reporting on the waste from nuclear generation in relation to other fuels perhaps the CER could advise how the amounts of Uranium (some of which is U235) and Thorium, which we understand may be above trace levels, in the waste obtained from coal generation plant will be reported? Perhaps the g/kWh methodology makes this kind of reporting straightforward? The table in Appendix 2 Section 2 would require an additional row for Coal for this.