CONSUMER DATA RIGHT MSATS PROCEDURES

MINOR AMENDMENT PROPOSAL

PARTICIPANT RESPONSE TEMPLATE

Participant: Telstra Energy

Submission Date: 13th April, 2023

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed minor amendment proposal associated with the Consumer Data Right MSATS Procedures effective date.

The changes being proposed to the effective date from 30 May 2023 to 1 November 2023 necessitate changes to AEMO's Retail Electricity Market Procedures. Noting, AEMO will consolidate procedures in the second half of 2023, which will include those changes impacted by the Consumer Data Right reform.

2. Questions on proposed changes

Questions	Participant Comments
Does your organisation agree with the proposed change to the effective date?	Telstra Energy agree with the proposed change to the effective date with the following comments:
	NMI Discovery
	In prior CDR consultation, AEMO indicated the LCCD field would not be made available via NMI Discovery.
	The 'CDR Minor Amendment Proposal' states (Page 3): "For NMI discovery purposes, the LCCD field will be displayed from 30 May 2023 to 31 October 2023, but no value will be populated against this attribute."
	Could AEMO please provide explanation to this NMI Discovery reference including expectation of participants performing NMI Discovery via CATS Browser and/or via API/FTP:
	Between 30th May 2023 and 31st October 2023
	After 1st November 2023
	It is Telstra Energy preference for the LCCD field to be made available via NMI Discovery to support customer onboarding processes.

Questions	Participant Comments
	CATS Procedure updates
	Telstra Energy continue to recommend CATS Procedure updates (to Section 2.2) to ensure universal and consistent participant update of the LCCD field.
	Telstra Energy believes that this recommended wording will make it clear about when (and by whom) the LCCD field should be updated. In particular, a participant should expect that AEMO will correctly update the field following processing of a 1030/1040 CATS CR though the obligation to ensure the LCCD field is correct remains with the Current FRMP.
	This recommended wording also makes it clear that there is no obligation on the Current FRMP to update an unpopulated LCCD field other than where there has been a change to the account holder starting or ending at a premise.
	The New FRMP must:
	(i) Populate or update the Last Consumer Change Date (LCCD) when the date the account holder changes for a premise- within 5 business days of:
	(i) the current FRMP becoming aware that the value in MSATS is not populated or is incorrect or
	(ii) an End User Transfer Change Request being Completed and the LCCD has changed.
	The Current FRMP must:
	(u) Populate or update the Last Consumer Change Date (LCCD) for a premise within 5 business days of:
	I. becoming aware an account holder has started or ended at a premises or;
	II. becoming aware the value in MSATS is populated and is incorrect or;
	III. becoming aware LCCD field has not been correctly updated following processing of a 1030/1040 CATS CR

Questions	Participant Comments
Does your organisation have an alternative proposal for implementation?	No comment