

CONSUMER DATA RIGHT (CDR) MSATS CONSULTATION – PART 2

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Origin Energy

Submission Date: 27th September 2022

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the Consumer Data Right consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO’s Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

2. Question on initial population of the Last Consumer Change Date

Heading	Participant Comments
Which of the proposed initial population options does your organisation prefer and why?	Origin’s limited assessment suggests Option 1 as all other options would require a greater amount of rework, with added complexity.
Is there an alternative initial population option you believe would better achieve the desired objectives?	Regardless of the data population method, Origin is concerned that this field might cause accountability issues where customer’s usage data is shared based on an incorrect date in this field. Hence it is extremely important to ensure all retailers follow a standard approach in populating, and more importantly, updating this field moving forward. There are many questions that require a standard approach so that MSATS data can be used in line with CDR’s principles of data integrity, e.g., what should be the correct/true date in this field? Will it be the transfer date? etc.
What do you believe should be considered in implemented your preferred initial population option?	Origin has two key considerations for AEMO’s perusal:

Heading	Participant Comments
	<ol style="list-style-type: none"> <li data-bbox="1305 296 2078 459">1. While Origin believes that maintenance of this new field can be managed via CR, retailers should be provided access to AEMO’s bulk update tool or similar functionality for initial population. <li data-bbox="1305 475 2078 1177">2. The time to implement these changes, considering retailers are yet to agree on a standardised approach to maintain this field, May 2023 implementation amid all other planned changes is highly risky and will jeopardise the quality of data. Origin suggests at least 12 months’ timeframe to implement the initial population followed by final report, i.e. the field to be made effective commencing no earlier than November 2023. Origin believes this would be the most effective implementation date as it would align with CDR go-live for all retailers. This would also allow sufficient time for the retailers to agree on a standard approach in populating this new field, as it seems contentious at this stage due to differing interpretations. Unless there’s a high CDR uptake, Origin strongly recommends provision of a transition period (for up to 12 months, i.e., until Nov 2024) to complete the data population.

3. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
2.10 AEMO	Addition of: <i>(p) Populate the Last Consumer Change Date upon completion of Change Requests 1030 and 1040. The Last Consumer Change Date will be populated with the Actual Change Date of the Change Request.</i>	Origin believes that the completion of the 1030/1040 will auto populate values in the LastConsumerChangeDate (LCCD) field (assumably a tenant, rather than an owner-occupier, is going to be the most likely to have this field populated, via CR1030/1040). Origin also notes that for a 1040 currently, it is restricted to 10-day retrospectivity.
12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	<p>“Table 4-A –Change Reason Codes” needs to be updated with the new CR codes as per section 12.5</p> <p>Clause 12.5.3 should be corrected to refer to clause 12.5.4 (it currently refers to 12.4.4)</p> <p>Regarding “Timeframe Rules” in section 12.5.5, can AEMO please confirm whether there will be any validation in MSATS to prevent the current FRMP from updating this field for the period it is/was not the FRMP?</p> <p>Also, if a retailer acquires a site erroneously, what would be the behaviour (or expected behaviour) of this field if the date is flagged by the FRMP that subsequently returned the site to previous FRMP? Scenarios where there’s an obvious mismatch must be addressed either in the MSATS Procedures, or technical validation (acknowledging, that could be quite complex).</p>

Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of 'Last Consumer Change Date'	No comments

4. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	Section 7.3.3, 7.3.5 and 7.3.7 has an error message, errata to be fixed with correct reference.

5. Standing Data for MSATS

Section	Description	Participant Comments
7.1 Field Definitions Table 12 CATS_NMI_DAT A – Field Definitions	Addition of 'Last Consumer Change Date'	<p>In this table, the 'party to provide' is marked as 'Current FRMP' however AEMO is also updating this field using CR1030/1040.</p> <p>It would be worth adding clarification that while the current FRMP will be responsible for data-accuracy of this field, 'Party to Provide' could be either AEMO or FRMP.</p>
7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	No comments
7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	No comments