

# CONSUMER DATA RIGHT (CDR) MSATS CONSULTATION – PART 2

## PROCEDURE CONSULTATION

## SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant: Jemena***

***Submission Date: 27/09/2022***

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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
<p>Which of the proposed initial population options does your organisation prefer and why?</p>	<p>Option 1 – Do not initialise</p> <p>Jemena also believe this is a good and simple way to implement the change, especially if a FRMP has the ability to retrospectively update the LCCD as necessary and as far back as necessary for the consumer to be able to retrieve data they are entitled to. See also section 3, where we’ve added notes to request an update to the retrospectivity of the new CR.</p> <p>A question – is AEMO assuming that a move-in transfer will have been arranged when a customer moves in, but the FRMP doesn’t change? If a transfer hasn’t been raised, does AEMO assume the current customer was there from the time the FRMP won the site, in which case it could provide more data than the customer was entitled? This assumes no move-in transfer was raised (or an</p>

Heading	Participant Comments
	incorrect 1000/1010 was raised instead), nor a CR raised to update the LCCD.
Is there an alternative initial population option you believe would better achieve the desired objectives?	
What do you believe should be considered in implemented your preferred initial population option?	Simplicity.

### 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>	<ul style="list-style-type: none"> <li>• <a href="#">Section 2.2 FRMP Obligations</a> – Jemena believe an obligation on provision of the Last Consumer Change Date (LCCD) by the new/current FRMP should be added to this section, according to CDR obligations. This will provide the assurance required for ongoing data integrity in the CR transactions.</li> <li>• <a href="#">Section 2.10</a> – question for AEMO is how they are going to handle the situation where a transfer reversal has taken place after completion of a 1030/1040 transfer?</li> </ul>

<p>12.5 Change NMI – Last Consumer Change Date</p>	<p>Addition of section 12.5 Change NMI – Last Consumer Change Date</p>	<ul style="list-style-type: none"> <li>• <b>Table 12-K – Timeframe Rules: Jemena believe the retrospective period should be set as far back as possible</b>, to ensure a customer is able to receive data they are entitled to and in the timeframe they are entitled, which is what CDR is all about. While the new CR can be raised on the completion of a move-in (regardless of whether a transfer is raised or not), it should also be used to update the LCCD to correct the date so that it shows when a customer really was responsible from – otherwise, how is AEMO going to provide a customer data they are entitled to when the date is not set or is incorrect – e.g. meter data for the last 5 months, when the CR only allows the current or future date to be provided, but the customer has been there many years?.             <ul style="list-style-type: none"> <li>○ Questions:                 <ul style="list-style-type: none"> <li>▪ Can a CR be created to go back in time to as long as necessary for the customer to have an accurate LCCD (i.e. not just the 140 business days)?</li> <li>▪ Can a current FRMP set the LCCD back in time prior to when it was not FRMP – else how can the consumer have an accurate LCCD?</li> </ul> </li> </ul> </li> <li>• <b>Table 12-L – Change Request Status Notification Rules: Jemena would like AEMO to broaden the scope to include LNSP role participants also receiving the COM notification for the new 5056/7 CR “Change NMI – Last Consumer Change Date” (LCCD).</b> This will allow the following benefits to meet obligations in our roles as LNSP/MDP:             <ul style="list-style-type: none"> <li>○ Providing the Jemena business a key date to help ensure consumers receive data they are entitled to, noting LNSPs and MDPs currently have similar obligations to AEMO to provide meter and standing data direct to consumers (via MDPP)</li> </ul> </li> </ul>
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		<ul style="list-style-type: none"> <li>○ Assists in identifying specific period/s a consumer has been residing at a premise, which:             <ul style="list-style-type: none"> <li>▪ Assists with requests to determine what information to provide direct to consumers for what date periods</li> <li>▪ E.g. customer moved in 2 months ago, but is asking for 2 years of meter data</li> <li>▪ E.g. A customer request on a list of service orders, we know how far back we can go with the information</li> </ul> </li> <li>○ Gives greater confidence to other consumer data date records, received as CDN or CATS notifications, noting the correct move-in transfer type isn't always raised, nor is a CDN always sent (with or without the correct reason)</li> <li>○ Helps us remain in synch with the industry, especially given we have similar obligations to provide the same data direct to consumers. If not, how can the industry answer the question about differing allowances of data provision to the same consumer (especially meter data) when AEMO or the LNSP/MDP is sent the same request for meter or standing data, but our LCCDs differ?</li> <li>• <u>12.5.3 Initiating Roles</u> - <b>update the section reference to be “12.5.4”</b> (incorrectly set to 12.4.4)</li> </ul>
<p>Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules</p>	<p>Addition of 'Last Consumer Change Date'</p>	<p>For the reasoning from comments on the new CR in 15.5 above, <b>Jemena requests an update to table 16-C to allow the LNSP to have access to the Last Consumer Change Date via the standing data access rights.</b></p>

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#### 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	N/A – not relevant to Jemena in our responsible roles

#### 5. Standing Data for MSATS

Section	Description	Participant Comments
7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions	Addition of 'Last Consumer Change Date'	A note to suggest that the definition cannot be finalised until the scope of the initial population of the LCCD has been confirmed. For instance, if option 1, this field will actually be blank, which means the O/M/R should also be reset to "Optional". If other choices are made, then the definition will need to be modified to suit the chosen option, with some understanding on how to populate it.
7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	<ul style="list-style-type: none"> <li>• Add AEMO to the "Party to Provide" field, as AEMO update the field on completion of a 1030/1040 CR</li> <li>• Update the aseXML Path to remove the space between Change and Date</li> </ul>

		<a href="#">ElectricityStandingData/MasterData/LastConsumerChange Date</a>
7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	