

CONSUMER DATA RIGHT (CDR) MSATS CONSULTATION – PART 2

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

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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>This response is predicated on the basis that AEMO would be pre-populating the field initially.</p> <p>AGL considers that Option 4 will provide the best benefit for end users, with hopefully the smallest number of updates required across the NEM.</p> <p>However, in supporting this option, AGL notes that no single options seems to be risk free and all may have unintended operational consequences.</p> <p>While AGL supports a pre-population of dates, AGL suggest that this option be workshopped with industry to identify any issues / consequences that are not immediately visible and come to a landing on pre-populating the date field with an initial value.</p>

Heading	Participant Comments
Is there an alternative initial population option you believe would better achieve the desired objectives?	No
What do you believe should be considered in implementing your preferred initial population option?	N/A

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>	Noted. This should minimise the number of additional transactions required.

Section	Description	Participant Comments
2.2 FRMP	Obligation to populate or maintain Last Change Date.	<p>AGL notes that while 2.10 has been amended to ensure AEMOs obligations, there has been no similar obligation placed within S 2.2 to ensure that the FRMP maintains and updates the last change date as necessary.</p> <p>Clause 2.1j would not apply , as the notice of error is most likely to come from a consumer, not another participant, and there is no clause within 2.2 which would require the current FRMP from maintaining the Last Change Date.</p> <p>Noting the privacy issues surrounding this information, AGL does believe that this should be clearly stated, in much the same way that 2.2q calls out obligations regarding the Customer Classification.</p>
12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	<p>Noted.</p> <p>However, as there may be new NMI classifications developed, some consideration may be warranted as to whether to include NMIs which may change, or like the WIGS procedure, list NMIs which are excluded.</p>
Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of ‘Last Consumer Change Date’	<p>Noted.</p> <p>AGL notes that the Last Consumer Change Date is not visible in NMI discovery but believes that this would be relevant information to other participants (eg MCs seeking to replace meters where a customer objection has been lodged) and supports it being visible in NMI discovery.</p>

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	Noted
7.3.2(b)		<p>As there are new NMI classifications being considered, it may be prudent to identify the NMI classifications which do not have customers as being excluded, rather than those with customers which are included.</p> <p>Eg</p> <p>The NMI classification is not INTERCON, BULK, XBOUNDARY.....</p>

5. Standing Data for MSATS

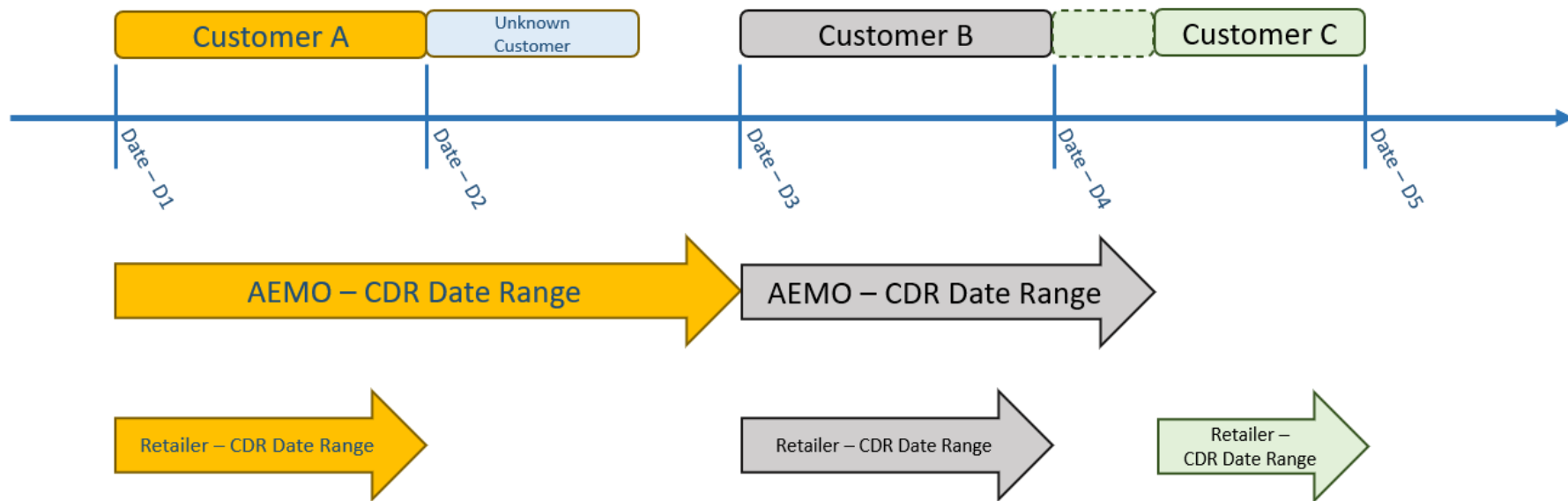
Section	Description	Participant Comments
7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions	Addition of ‘Last Consumer Change Date’	AGL notes this change but considers that as AEMO will populate the data from 1030 and 1040 CRs, then this needs to be shown as both Current FRMP and AEMO, otherwise the implication is that the current FRMP must submit a CR even when the 1030/1040 will suffice.
7.2 Table 13 CATS_NMI_Data	Addition of ‘Last Consumer Change Date’	AGL supports this information being made available on the NMI Discovery Standing Data pages / files.
7.3 Table 14 CATS_NMI_Data Field value examples	Addition of ‘Last Consumer Change Date’	Noted

6. Other

Topic	Comment
<p>Schema update – CI 4.2.3 - page 17</p>	<p>AGL notes the comment regarding allowing participants to remain on the n-1 Schema.</p> <p>AGL understands this comment to refer to non-CDR participants but expects all retailers to upgrade their schema to implement this change required for the provision of CDR data, regardless of whether that retailer has a CDR obligation or not.</p>
<p>Operational Processes to manage Last Consumer Date.</p>	<p>AGL understands that AEMO expects the Last Change Date to only be populated when a customer account is newly established. However, there can be periods when there is an unknown customer who is consuming energy between contracted customers.</p> <p>To ensure privacy, the last change date should also be set when accounts are closed and customers advise they are moving out.</p> <p>See figure 1 below for a graphical example.</p> <p>As such, while AGL considers the technical solution may not require further development, AGL strongly suggests 1-2 workshops be held during October to tease out the operational issues prior to all procedures and participant processes being completed.</p>
<p>CI 4.3.2 Extend MDPP Procedures</p>	<p>AGL notes that CL 4.3.2 discusses the extension of the MDPP procedures to include standing following NEL/NER amendments but has not seen any proposed re-drafting of the MDPP {Procedures to understand what changes are to be made and what impacts there may be on participants.</p>

Figure 1- Graphic Example

Impact of Unknown / non-Contracted Customer



The AEMO proposal will only see the Change date set when the customer account starts, but does not consider when the account might end. As such, the consumer Date range may include a period for any Unknown consumer period.

AGL proposes that the date should also be set when a customer moves out to ensure that their relevant period is set, and there is no drift into a period of usage by an Unknown consumer.