

Our Ref: 13889294v1  
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1 June 2022

Ms Violette Mouchaileh  
Executive General Manager, Reform Delivery  
Australian Energy Market Operator

By email: [violette.mouchaileh@aemo.com.au](mailto:violette.mouchaileh@aemo.com.au)

Dear Ms Mouchaileh

### **Re: Consumer Data Right MSATS Consultation**

Thank you for the opportunity to provide a submission on the Consumer Data Right (CDR) MSATS Consultation.

The AER is broadly supportive of the proposed amendments directly related to the CDR, and we have elected to address only those amendments in this submission, specifically:

- The addition of a “Last Consumer Change Date” field into MSATs
- Changes to CR5054 and CR5055 Change NMI Details transactions to allow the current FRMP to explicitly maintain the “Last Consumer Change Date” field.

The AER recognises the value of the CDR in improving consumers’ ability to compare and switch between products and services, fostering competition. As the operator of the Australian Government’s energy price comparison service—Energy Made Easy—the AER has direct experience delivering comparison services to consumers. With the benefit of this experience, the AER considers that the proposed changes will unlock the ability for CDR-enabled comparison and switching services to deliver richer, and more accurate, product comparisons for those consumers who are switching frequently, and realising the benefits of competition that the CDR is expected to deliver.

For comparison and switching services generally, the richer the data available, the better the outcomes for the consumer. The AER recognises that historical metering data is only one component in providing richer and more personalised comparisons for consumers, but improving continuity of access to this data from MSATS is an important step to enable service providers and consumers to harness the value of the CDR.

Yours sincerely



Kathie Standen  
Executive General Manager, Consumers, Policy & Markets

Sent by email on: 02.06.2022  
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