

# CONSUMER DATA RIGHT (CDR) CONSULTATION

## PROCEDURE CONSULTATION

## FIRST 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 initial 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. Questions on proposed CDR changes

Heading	Participant Comments
<p>Does your organisation support the proposal contained in the Issues Paper? If not, please specify the areas where your organisation does not support AEMO’s assessment and specify information as to your rationale</p>	<p>AGL supports the changes to the enumerations for MSATS Standing Data.</p> <p>AGL does <b>NOT</b> support the changes to MSATS to include a date field to support CDR – See Attachment 1 for further detail.</p>
<p>Are there better options to accommodate the change proposals that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?</p>	<p>AGL agrees that these proposed minor changes to MSATS standing Data items best accommodate the necessary changes.</p> <p>AGL does <b>NOT</b> support the changes to MSATS to include a date field to support CDR – See Attachment 1 for further detail.</p>

Heading	Participant Comments
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	<p>At this stage, the changes to the MSATS standing data elements should pose only minor changes as the enumerations should be available in a stand alone file outside MSATS.</p> <p>AGL does <b>NOT</b> support the changes to MSATS to include a date field to support CDR – See Attachment 1 for further detail.</p>
Do you have any further questions or comments in relation to the proposals?	-

### 3. Feedback on proposed minor amendments

Document	Participant Comments
1. For the enumerations lists in the procedures document, values such as 'Sample Tested' and 'Three-Phase Three-Limb', to be changed from mixed case to uppercase, to improve implementation and validation for both AEMO and Industry.	AGL supports the change.
2. For the Voltage Transformer Type enumerations, to remove descriptions where they exist in brackets e.g. 'CVT (Capacitive Voltage Transformer)	AGL supports the change.
3. Where Ratio enumerations exist, remove spaces between characters e.g. '3300 : 110' to '3300:110'	AGL supports the change.
4. INFORMATION' and 'STATISICAL' are to be truncated to 'STATIS' and 'INFORM' to fit within the 'USE' field 10 character max limit.	AGL supports the change.

Document	Participant Comments
<p>5. Alignment of character requirements across aseXML and the Standing Data for MSATs document by including a reference to the Australian Standards requirements, where relevant in the document applicable.</p>	<p>AGL supports this change – but seeks greater clarity.</p> <p>A recent review of changes to AS 4590 indicates that some field lengths have changes between earlier Standards and the recent Standard – eg House Number was a 5 character field in 1999 but is a 6 character field in AS 4590:2017.</p> <p>This already has implications in B2B, but this alignment may impact other MSATS fields.</p> <p>AGL is also aware that mismatches between B2M and B2B transactions have been identified, and is working with Origin Energy to develop a change request to address these mis-matches.</p> <p>AGL would suggest that this proposed change needs further assessment for the reasons above.</p>
<p>6. For the correction of the GPS Coordinates format, implemented in as part of the r42 schema, to be reflected in the Standing Data for MSATs document: CATS_Meter_Register- Browser Cross Reference table.</p>	<p>AGL supports the change.</p>
<p>7. For the truncated CurrentTransformerRatioAvailable and CurrentTransformerRatioConnected element names to be reflected in Table 4 CATS_Meter_Register – Browser Cross Reference.</p>	<p>AGL supports the change.</p>
<p>8. For the VoltageTransformerTest aseXML path to be corrected to ElectricityMeter/VoltageTransformerTest in table 4 CATS_Meter_Register – Browser Cross Reference.</p>	<p>AGL supports the change.</p>

Document	Participant Comments
<p>9. For GPS Coordinates of 0.00000 (5-7 decimal places), to align with the format specified in the NMI Standing Data Procedure, to be applied where no GPS coverage is available at the metering installation.</p>	<p>AGL supports the change.</p>
<p>10. For the inclusion of missing Transformer Valid Values to be added to the Standing Data for MSATS document and for all values to be formatted from smallest to largest.</p>	<p>AGL supports the change.</p>
<p>11. The CATS Procedures to be updated to ensure that 'Meter Manufacturer' and 'Meter Model' are only required when the status code is 'C' (Current) for CR3050 and CR3051 transactions (CiP_061).</p>	<p>AGL supports the change.</p>
<p>12. For the CATS Procedures to be updated to remove the CR6500/1 Change ROLR Completed Notification from the Change ROLR section to align with the WIGS Procedures</p>	<p>AGL supports the change.</p>
<p>13. For the CATS Procedures to be updated for CRs (5001 &amp; 5021) to include the NMI Classification of NCONUML as a classification code that have objections raised on it</p>	<p>AGL supports the change.</p>
<p>14. Update the WIGS procedure for CR5021 to allow the ENLR (LR) to object.</p>	<p>AGL supports the change.</p>
<p>15. Update the WIGS procedure to include BULK and XBOUNDARY to CR1500 to allow the MDP to send it to complete the CR.</p>	<p>AGL supports the change.</p>

**Attachment 1 – AGL View on CDR Change**

**Legislative matters**

AGL notes the request from Treasury to AEMO to support the provision of metering data, but at this time, we understand that the changes to the National Electricity Law (NEL) to support AEMO's role as a data holder under the Consumer Data Right (CDR) are still in draft form and have not as yet passed the SA Parliament.

Therefore, while these changes to the NEL are under consultation and not yet part of the NEL, AGL suggests that AEMO does not proceed with these changes until it has a clear power under the NEL (by way of an expansion to its statutory functions) to consult on, or make any changes to Electricity Procedures or systems (eg MSATS and CATS), to support a CDR obligation. AGL is also concerned that the very fact of the consultation being undertaken may engender costs which accrue to all participants and AEMO for a change which should not have been proposed or consulted on at this time.

Further, the proposed go live date for the MSATS changes is May 2023, which is 7 months prior to the second tranche of retailers going live in CDR. As such, this change then places obligations arising from CDR requirements on all retailers (ie: changes to system and business processes and obligations to supply CDR data) including retailers who are in the second and third tier for the rollout of the CDR, prior to those retailers coming under any obligations within the CDR framework.

As such, AGL does not support this aspect within the consultation. Once the necessary CDR changes have passed the SA (and other jurisdictional) Parliaments, then, depending on the final amendments, it may be appropriate for AEMO to commence consultation on this change.

### **General Comments in respect to operationalisation of proposed field**

Whilst AGL can understand the benefit which Treasury is trying to achieve through this request to AEMO. We question whether Treasury and AEMO clearly understands the obligations which energy retailers have with regards to contracting customers and may have been misguided in the applicability of introducing a field in MSATS which will denote when a NMI has changed account holder, and the risks associated with such a proposal.

As AEMO has been made aware at various forums, ranging from the CDR Technical working group through to the aseXML Standards Working Group (ASWG) and the Electricity Retail Consultative Forum (ERCF), that the proposed solution was not viable , contained unnecessary risk and change which would largely be placed on the retailer and was not supported by many retailers.

AGL does not agree with Treasury's or AEMO's statement that "the introduction of such a field would ensure that when sharing of a consumer's energy data occurs, following authentication by the consumer's current retailer, metering data is provided for the time that the CDR consumer was associated with the NMI." This assessment is inaccurate and does not account for scenarios already being faced by the energy industry today. Including:

- Consumers who reverse their decision to sign up to an address;
- Consumers who do not appropriately disclose that they are an insitu consumer and are processed as a move in;
- Consumers who advise that they are an insitu consumer when in fact they were not the original account holder with the previous retailer - leading to the new retailer not flagging the site as having a new consumer in place (such as a partner or a housemate taking over an account).

In the first example, it is possible that the date field will be set incorrectly or not set when it should be set, leading to erroneous decisions and risks of privacy breach. This is of particular concern to retailers who have clear obligations regarding privacy, and the release of such data may also breach Family Violence privacy settings put in place by the current retailer.

In the second example, unclear, inadequate, or misleading information provided to one of the retailers in the data chain, will lead to a privacy breach as described above. This is a risk no retailer can adequately manage, as it is dependent on the end user and the information they may choose or not choose to provide.

In the case of the third example, like the other examples, this can have severe consequences for consumers who are affected by family violence or have specifically requested their data not to be shared - with access to their usage information being shared with an unauthorised person.

All these risks are exacerbated when type 4/5 interval data is released, which can provide a significant amount of information about a premise and usage pattern. The times or days which a property is left unoccupied, or when at night appliances are no longer in use. The inadvertent release of such data to an unauthorised person can have substantial privacy and security risks for the consumer.

In all three scenarios AGL has serious concerns regarding its privacy and liability risks as it is requiring a retailer to pass on meter data for a consumer for a period for which it has no record as to whether the meter data is actually relevant to that retailer. Further, noting that the retailer has to delete this data after passing it on, AGL also considers that it has no way of protecting itself from liability or customer / ombudsman complaints in such a situation.

As demonstrated above and as was also clearly articulated in discussions at the CDR Technical Working group, neither AEMO nor a winning retailer of a NMI, can guarantee the security of a consumer's information will be maintained with the proposed solution proposed in this Issues Paper. Therefore, AGL does not support this solution, and strongly objects to AEMO pursue this proposal.

AGL question the cost which will need to be borne by retailers, and in turn consumers, of introducing this field to MSATS and new associated procedures. There has been no cost assessment undertaken by either AEMO or Treasury in making this proposal.