

CONSUMER DATA RIGHT (CDR) CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Origin Energy

Submission Date: 2nd June 2022

Table of Contents

1. Context	3
2. Questions on proposed CDR changes	3
3. Feedback on proposed minor amendments	10

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>Origin Energy does not support inclusion of a new field or flag in MSATS, that is associated with customer information as opposed to site information. It is neither a Market Transfer, nor a Settlements function and hence should not be in scope of MSATS.</p> <p>Historically, AEMO has provided its legal advice to the industry on the use of MSATS for ‘life support flag’ in MSATS however which was rejected by AEMO based on it being ‘consumer-specific information’ and not ‘site-specific information.’</p> <p>MSATS procedures are enforceable under the National Electricity Rules and Origin is unsure whether a letter/request from Treasury is sufficient to enforce these CDR requirements via MSATS procedures, considering it belongs to a separate legislation that does not provide enforceability of MSATS procedures to be governed by AEMO.</p>

Heading	Participant Comments
	<p>Lastly, Origin Energy believes that the solution proposed by AEMO is quite rushed, has not been consulted previously, and is largely driven by an already-proposed solution by the Treasury. The solution does not cater for a number of other processes, including error correction, validation, reporting and audit requirements to ensure the flag/field is updated accurately. Due to the lack of these exception handling processes, Origin considers AEMO’s proposed solution is risky to implement and can pose data integrity risks on industry if the flag is incorrectly maintained in MSATS.</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>Origin requests AEMO to consider the aforementioned factors and reassess its position in providing historical metering data.</p> <p>An alternative option would be for customer to inform their appointed ADR about their electricity retailers so that ADR can request it from multiple retailers as required. Each retailer can then authenticate AEMO’s request to provide this data based on their associated period with that customer for that NMI. Since CDR data flows are API based, these transactions can be sent by the ADR all at once and AEMO can provision this information to the respective retailers without the need of implementing any MSATS-based CDR validation. While this may sound complicated, it might be the easiest solution instead of adding further complexity in MSATS. Moreover, Origin considers this solution would only be used where change of retailer has taken place and data request period is greater than current retailer length period.</p>

Heading	Participant Comments
	<p>Also, AEMO should be able to use customer switching information held in MSATS where ‘Change Retailer Insitu’ CRs (e.g. CR1000) provides information that customer has remained the same but switched retailers, whereas ‘Change Retailer Movein’ (e.g. CR1020/1030) provides change in customer as well as retailer. Where customer has changed, but retailer has not changed, it should be the responsibility of retailer to only request data for current customer period. Based on these principles, Origin Energy believes that CDR use cases will be appropriately covered without the need of additional flag.</p> <p><u>Worked examples based on AEMO’s scenarios in Issues Paper:</u></p> <p>1. Single Consumer, Single Retailer</p> <p>Assumption: Origin has been FRMP for the whole duration and no change in customer during that period. In this scenario, Origin considers:</p> <ul style="list-style-type: none"> - Origin to request data for entire period and AEMO to provide this data. - Current model supports this scenario, no new field is required in MSATS as also noted in AEMO’s CDR Issues Paper. <p>2. Single Consumer – Change of Retailer</p>

Heading	Participant Comments
	<p>Assumption: Origin is FRMP for some part of data-request period, and no change in customer. In this scenario, Origin considers:</p> <ul style="list-style-type: none"> - Origin to request data for entire period, AEMO to provide it for the entire period however in multiple files based on the 'Change Retailer Insitu' history/timeslicing recorded in MSATS during data-request period. - While this scenario might require further analysis, current MSATS data for insitu transfer will work similar to the new proposed field, if AEMO is only looking for a 'change in retailer' trigger, and not 'change in customer/account holder' trigger. - In this scenario, current retailer may inform the ADR that the request period is greater than the FRMP period and ADR may choose to either contact the customer to provide previous retailer information to the ADR or reduce the data-request period. <p>3. Multiple Consumers – Single Retailer / Move In</p> <p>Assumption: Origin is FRMP for the entire duration, however customer changed during FRMP period. In this scenario, Origin considers:</p> <ul style="list-style-type: none"> - Origin to request data for the period where current customer is associated with that NMI, and AEMO to provide this data. - Onus should be on Origin (as current retailer) to only request data for the current customer and not for the previous

Heading	Participant Comments
	<p>customer/s, hence the new proposed field is redundant in this scenario.</p> <ul style="list-style-type: none"> - As such, no new field required to fulfil this scenario as also noted in AEMO's CDR Issues Paper. <p>4. Multiple Consumers – Change of Retailer with Move In</p> <p>Assumption: Origin is FRMP for a part of the data-request period, however no customer change during FRMP period. In this scenario, Origin considers:</p> <ul style="list-style-type: none"> - Origin to request data for the period where current customer is associated with that NMI, and AEMO to provide this data. - In theory, this is identical to scenario 1, no new field required to fulfil this scenario as also noted in AEMO's CDR Issues Paper. <p>5. Change of Account Holder – No Move In</p> <p>Assumption: Origin is FRMP for the entire data-request period, however account holder changed during FRMP period.</p> <ul style="list-style-type: none"> - In this scenario, AEMO has assumed that a retailer may not create a new account if there is a change in ownership or tenancy. Origin believes that industry should not create solutions based on assumptions that may not be correct as retailers create a new account when a new person takes ownership.

Heading	Participant Comments
	<ul style="list-style-type: none"> - Where a retailer creates a new account for the new tenant, it will reset the proposed LasConsumerChangeDate flag and hence will only receive data for the new tenant by AEMO. As such in this case, the proposed field serves no purpose if a retailer is able to request data only for the new account holder. - At a high level, this is identical to scenario 3 and where a new account is created, Origin will request data for the period where current the account holder is associated with that NMI, and AEMO to provide this data. - Onus should be on Origin (as current retailer) to only request data for the current account holder and not for the previous account holder, hence the new proposed field is redundant in this scenario provided there is evidence that retailers are not able to create a new account for the new tenant (as per AEMO’s example provided in the Issues Paper). <p>6. Change of Account Holder – Authorised Party</p> <p>Assumption: Origin is FRMP for the entire data-request period, however an additional authorised contact is added during FRMP period. In this scenario, Origin considers:</p> <ul style="list-style-type: none"> - As noted in AEMO’s CDR issues paper, the current model supports this scenario, and no new field is required to fulfil this scenario. <p>In summary, only two of the given six scenarios are in scope for the new proposed field, for which, alternative process could be used, including retailers to validate request periods and</p>

Heading	Participant Comments
	<p>AEMO to utilise switching data (CR1000/1020/1030, etc.) to validate the data provisioning, as required.</p>
<p>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</p>	<p>In absence of the end-to-end process, this new proposed field can add a lot of complexity in the CDR landscape. Moreover, Origin is unsure of the volume of requests that will fall into the gap scenarios mentioned above.</p> <p>Without any comprehensive volumetric analysis performed by the industry, Origin believes that the implementation cost to update MSATS only to cater for a couple of scenarios, might outweigh the benefit of adding this new field and associated processes that retailers have to build to update this field in MSATS (implementation cost + ongoing cost).</p> <p>Origin suggests AEMO to facilitate a cost-benefit analysis prior to enforcing any new field in MSATS. AEMO should also consider existing standing data in MSATS in order to manage the multiple retailer scenario for insitu transfers. Due to the lack of confidence in administering this field, including any error correction processes that will require to be implemented, Origin does not support AEMO's proposed solution in its current state.</p>
<p>Do you have any further questions or comments in relation to the proposals?</p>	<p>Treasury's letter to AEMO is based on a 'solution-based' approach which is quite restrictive. As such, Origin suggests that AEMO should consider a 'requirements-based' approach as the first logical step, followed by exploring multiple solutions</p>

Heading	Participant Comments
	<p>that can support CDR historical metering data gap highlighted in scenario 2 of the Issues Paper.</p> <p>Origin suggests the end-to-end requirements to be discussed in the industry workshop scheduled for the 14th of June 2022 by AEMO, to ensure the gaps are well understood and alternative designs/solutions can be explored.</p>

3. Feedback on proposed minor amendments

Document	Participant Comments
<p>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.</p>	<p>Agree</p>
<p>2. For the Voltage Transformer Type enumerations, to remove descriptions where they exist in brackets e.g. 'CVT (Capacitive Voltage Transformer)</p>	<p>Agree</p>
<p>3. Where Ratio enumerations exist, remove spaces between characters e.g. '3300 : 110' to '3300:110'</p>	<p>Agree</p>
<p>4. 'INFORMATION' and 'STATISICAL' are to be truncated to 'STATIS' and 'INFORM' to fit within the 'USE' field 10 character max limit.</p>	<p>Unless the field length can be expanded further, Origin does not have any issues with the proposed approach.</p>

Document	Participant Comments
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.	Agree
6. For the correction of the GPS Coordinates format, implemented inas part of the r42 schema, to be reflected in the Standing Data for MSATs document: CATS_Meter_Register- Browser Cross Reference table.	Agree
7. For the truncated CurrentTransformerRatioAvailable and CurrentTransformerRatioConnected element names to be reflected in Table 4 CATS_Meter_Register – Browser Cross Reference.	Agree
8. For the VoltageTransformerTest aseXML path to be corrected to ElectricityMeter/VoltageTransformerTest in table 4 CATS_Meter_Register – Browser Cross Reference.	Agree
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.	Agree
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.	Agree
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).	Agree
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	Agree

Document	Participant Comments
13. For the CATS Procedures to be updated for CRs (5001 & 5021) to include the NMI Classification of NCONUML as a classification code that have objections raised on it	Agree
14. Update the WIGS procedure for CR5021 to allow the ENLR (LR) to object.	Agree
15. Update the WIGS procedure to include BULK and XBOUNDARY to CR1500 to allow the MDP to send it to complete the CR.	Agree