

CONSUMER DATA RIGHT (CDR) CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

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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>PLUS ES supports the concept of the proposal. The ability to identify a customer move in and the date would deliver additional benefits to industry participants, beyond the scope of CDR.</p> <p>PLUS ES does not support the proposal as published, as the requirements are not sufficiently robust to support the scenario of a customer requiring historical data for a timeframe where they have been the retail customer of 2 or more Retailers. Hence, significantly increasing the risk of:</p> <ul style="list-style-type: none"> • Privacy Breaches – i.e. the indicator has not been set or incorrect dates have been applied • Not meeting customer expectations – a change in retailer customer does not mean a change of ‘customer’ on the site. How does one consistently differentiate between the various scenarios?

Heading	Participant Comments
<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>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</p>	<p>The main challenges in adopting the proposed changes are administrative in nature and focus on reliability of the data:</p> <ul style="list-style-type: none"> • Ensuring the Retailer provides/updates the LastConsumerChangeDate field. <ul style="list-style-type: none"> ○ No obligations have been placed on the current FRMP. PLUS ES proposes placing CATS obligations for Last Consumer Change Date on the current FRMP in section 2.2, similar to (p) and (q) with respect to Customer Classification Codes. The obligations should factor the significant implications of potential Privacy Breaches and should include appropriate timeframes, the requirement to provide and/or update, take corrective actions etc • Change of Account Holder – No move in – Scenario 5 of the Issues Paper. <ul style="list-style-type: none"> ○ According to the diagram if meter data is only available to Consumer 2 for the indicated timeframe, an additional indicator needs to be added - when Consumer 2 became the retailer customer. ○ Retailer specific internal protocols. Variances in interpretations and Retailer protocols could deliver unintended disparities and confusion for end consumers or potentially create downstream issues for the current FRMP requesting the historical data.

Heading	Participant Comments
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.	
2. For the Voltage Transformer Type enumerations, to remove descriptions where they exist in brackets e.g. 'CVT (Capacitive Voltage Transformer)	
3. Where Ratio enumerations exist, remove spaces between characters e.g. '3300 : 110' to '3300:110'	<p>No qualification has been provided for the change.</p> <p>PLUS ES does not support this change as we have finalised the build and it would require additional changes for no identified benefits.</p>
4. 'INFORMATION' and 'STATISICAL' are to be truncated to 'STATIS' and 'INFORM' to fit within the 'USE' field 10 character max limit.	
5. Alignment of character requirements across aseXML and the Standing Data for MSATs MSATS document by including a	

Document	Participant Comments										
<p>reference to the Australian Standards requirements, where relevant in the document applicable.</p>											
<p>6. For the correction of the GPSCoordinates 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.</p>	<p>PLUS ES believes that Meter (highlighted) should be Electricity meter as in all other relevant fields.</p> <table border="1" data-bbox="1126 485 2072 671"> <tr> <td data-bbox="1126 485 1310 576">GPS Coordinates--Latitude</td> <td data-bbox="1310 485 1516 576">GPSCoordinatesLat</td> <td data-bbox="1516 485 1798 576">Meter/GPSCoordinates/LatitudeElectricityMeter/GPSCoordinatesLat</td> <td data-bbox="1798 485 1912 576">NUMERIC (s2.7)</td> <td data-bbox="1912 485 2072 576">xsd:decimal minIncl = -99.9999999 maxIncl = 99.9999999 totdig = 2 fracdig = 7</td> </tr> <tr> <td data-bbox="1126 576 1310 671">GPS Coordinates --Longitude</td> <td data-bbox="1310 576 1516 671">GPSCoordinatesLong</td> <td data-bbox="1516 576 1798 671">Meter/GPSCoordinates/LongitudeElectricityMeter/GPSCoordinatesLong</td> <td data-bbox="1798 576 1912 671">NUMERIC (s3.7)</td> <td data-bbox="1912 576 2072 671">xsd:decimal minIncl = 0 maxIncl = 999.9999999 totdig = 3 fracdig = 7</td> </tr> </table>	GPS Coordinates--Latitude	GPSCoordinates Lat	Meter/GPSCoordinates/LatitudeElectricityMeter/GPSCoordinatesLat	NUMERIC (s2.7)	xsd:decimal minIncl = -99.9999999 maxIncl = 99.9999999 totdig = 2 fracdig = 7	GPS Coordinates --Longitude	GPSCoordinates Long	Meter/GPSCoordinates/LongitudeElectricityMeter/GPSCoordinatesLong	NUMERIC (s3.7)	xsd:decimal minIncl = 0 maxIncl = 999.9999999 totdig = 3 fracdig = 7
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<p>7. For the truncated CurrentTransformerRatioAvailable and CurrentTransformerRatioConnected element names to be reflected in Table 4 CATS_Meter_Register – Browser Cross Reference.</p>	<p>It is still not clear what the change requires.</p> <p>Having the same Element name for 2 different Fields could be very confusing or trigger downstream impacts. i.e.</p> <pre data-bbox="1151 879 1617 979"> </RegisterConfiguration> <CurrentTransformerLocation>Inside Cabinet</CurrentTransformerLocation> <CurrentTransformerType>A</CurrentTransformerType> <CurrentTransformerRatioAvailable>50 / 100 / 150 : 5</CurrentTransformerRatioAvailable> <CurrentTransformerRatioConnected>150 : 5</CurrentTransformerRatioConnected> </pre> <p>We therefore suggest the aseXML Data Element Names should be amended to readily distinguish between the 2 individual fields</p>										
<p>8. For the VoltageTransformerTest aseXML path to be corrected to ElectricityMeter/VoltageTransformerTest in table 4 CATS_Meter_Register – Browser Cross Reference.</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>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>As per PLUS ES' response to Question 3, if the spaces are not removed, then they need to be included in these values.</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>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>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</p>	
<p>14. Update the WIGS procedure for CR5021 to allow the ENLR (LR) to object.</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>	