



EXECUTIVE OFFICE

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By email: [NEM.Retailprocedureconsultations@aemo.com.au](mailto:NEM.Retailprocedureconsultations@aemo.com.au)

Dear Mr Geers

### **Submission to MSATS standing data review**

The Australian Competition and Consumer Commission (ACCC) welcomes the opportunity to make a submission to the Australian Energy Market Operator's (AEMO) Market Settlement and Transfer Solution (MSATS) standing data review. The ACCC makes this submission in the context of the Australian Government's Consumer Data Right (CDR) initiative, in relation to which the ACCC is the lead implementation agency.

### **CDR background and assumptions**

The ACCC continues to prepare for the implementation in energy, as the next sector to which the CDR will be rolled out after banking. This rollout is currently at the stage of framework development, with a designation instrument for the energy sector scheduled to be finalised by June 2020, though we note the potential for delays due to the impact of COVID-19. The Treasurer has responsibility for making the designation instrument, which will specify the data sets and data holders that will be subject to the CDR in energy.

The Treasurer has made an in-principle decision that National Metering Identifier (NMI) standing data will be a designated data set in the designation instrument.<sup>1</sup> Although not yet specified, we expect that AEMO will be designated the data holder for this data set.

AEMO's MSATS standing data review is timely as it provides an opportunity to assess whether additional data fields are required to support the CDR. We provide details of one such data field in relation to the NMI below.

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<sup>1</sup> The Treasury, 2020, *Energy sector consumer data right*, <https://treasury.gov.au/consumer-data-right/energy-sector-consumer-data-right>, viewed 18 March 2020.

## **Data field indicating when a NMI has changed customer**

A key tenet of the CDR is secure sharing of consumer data – that is, that the correct data relating to an authenticated consumer is shared with an accredited third party, in line with the consumer's consent. We consider a data field indicating when a NMI has changed customer (i.e. a change in account holder field) will be critically important in ensuring that data sharing within the CDR regime operates in a secure and efficient manner.

Currently, AEMO does not capture information about when a NMI changes hands. All CDR authentication models for energy currently being considered will require some retailer involvement. However, without information about when a NMI has changed customer, additional retailer involvement (from the consumer's current retailer and potentially past retailer or retailers) will be required to determine that the customer making the data sharing request was, is and continues to be linked to the NMI for the time period relating to the data sharing request. The purpose of this check is to avoid inadvertent sharing of data that does not relate to a customer currently linked to the NMI (for example, data relating to a previous occupant of a premises).

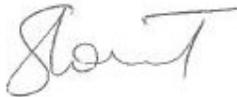
A flag indicating when a NMI has changed customer would alleviate the need for further involvement of the customer's current retailer (for ongoing data sharing) or past retailer or retailers in this aspect of the authentication model. While relevant to one-off data sharing requests, this is particularly important where there is an ongoing data sharing arrangement or a request for historical data sets where AEMO is the data holder.

We note that, for the purposes of defining this field, further analysis is required to define what a 'change in customer' means. Ideally, we would prefer the definition to be aligned to the definition of who is eligible to make CDR requests, which, while still to be settled in the designation instrument and CDR rules, is likely to be the electricity account holder.

The ACCC welcomes further involvement in how this field is defined so as to best facilitate the implementation of the CDR in the energy sector.

Should you have any queries about this submission, please contact Bruce Cooper, General Manager Consumer Data Right Branch, on (02) 6243 1256.

Yours sincerely



Sarah Court  
Commissioner