

MSATS STANDING DATA REVIEW
IMPLEMENTATION DATE

PROPOSED MINOR AMENDMENT

PARTICIPANT RESPONSE TEMPLATE

Participant: Origin Energy

Submission Date: 17 December 2021

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed minor amendment process associated with the MSATS Standing Data Review implementation date.

The changes being proposed to the implementation date from 1 May 2022 to 7 November 2022 necessitate changes to AEMO’s Retail Electricity Market Procedures.

Questions on proposed changes

Question	Participant Comments
Does your organisation agree with the proposed change to the implementation start date?	<p>In principle, Origin Energy’s broadly supports the delayed implementation, as it will provide an opportunity to include other proposed changes to be implemented altogether, including Origin’s ICF on GPS coordinates for non-contestable loads.</p> <p>Having said that, due to the close proximity of 7th November 2022 with Consumer Data Right’s (CDR) go-live on 15th November 2022, Origin Energy is concerned whether 7th November 2022 is a practical date to implement bulk of MS DR changes. As such, it is important to understand whether AEMO has performed adequate dependency management exercise to ensure the risks associated with industry operations are well understood and managed beforehand. One of the key risk is the industry testing for MS DR would not be fit-for-purpose for CDR, and vice versa.</p> <p>With that in mind, Origin Energy suggests AEMO to facilitate a two-fold approach, i.e. governance for 7th November 2022 go-live (as normal) and</p>
Does your organisation have an alternate proposal for implementation?	

Question	Participant Comments
	<p>targeted CDR support to industry participants subjected to 15th November 2022 go-live. Proposed activities may include, but not limited to:</p> <ul style="list-style-type: none"> - AEMO to publish an updated version of 'Regulatory Implementation Roadmap' on its website to include the proposed MSDR go-live and CDR go-live dates/milestones; - AEMO to continue providing industry-wide governance for MSDR go-live and confirm whether CDR go-live poses any additional challenges (not limited to AEMO, but across the market); - AEMO to provide detailed dependency management on impacted market procedures and market systems; - AEMO to provide an environment and test strategy no later than 1 Mar 2022 to provide industry confidence of AEMO's ability to facilitate CDR-based market testing and MSDR testing concurrently. This will ensure there is no compromise of either reform due to conflicting testing requirements; and - at a minimum, AEMO to facilitate CDR go-live risk/issues register as a standalone activity, to be governed amongst targeted participants.