Consumer Data Rights – Workshop #2

12 July 2022

We acknowledge the Traditional Owners of country throughout Australia and recognise their continuing connection to land, waters and culture.

We pay respect to their Elders past, present and emerging.

AEMO Competition Law Meeting Protocol

- AEMO is committed to complying with all applicable laws, including the Competition and Consumer Act 2010 (CCA). In any dealings with AEMO regarding proposed reforms or other initiatives, all participants agree to adhere to the CCA at all times and to comply with this Protocol. Participants must arrange for their representatives to be briefed on competition law risks and obligations.
- Participants in AEMO discussions must:
- Ensure that discussions are limited to the matters contemplated by the agenda for the discussion
- Make independent and unilateral decisions about their commercial positions and approach in relation to the matters under discussion with AEMO
- Immediately and clearly raise an objection with AEMO or the Chair of the meeting if a matter is discussed that the participant is concerned may give rise to competition law risks or a breach of this Protocol
- Participants in AEMO meetings must not discuss or agree on the following topics:
- Which customers they will supply or market to
- The price or other terms at which Participants will supply
- Bids or tenders, including the nature of a bid that a Participant intends to make or whether the Participant will participate in the bid
- Which suppliers Participants will acquire from (or the price or other terms on which they acquire goods or services)
- Refusing to supply a person or company access to any products, services or inputs they require

Under no circumstances must Participants share Competitively Sensitive Information. Competitively Sensitive Information means confidential information relating to a Participant which if disclosed to a competitor could affect its current or future commercial strategies, such as pricing information, customer terms and conditions, supply terms and conditions, sales, marketing or procurement strategies, product development, margins, costs, capacity or production planning.

Agenda

1. CDR Recap
2. AEMO's revised proposal
3. Options analysis
4. Confirmation of the preferred solution for the Draft report
5. Initial/Historical date population options
6. How the APIs will work
7. Scenarios
8. Next steps:
   - Consultation timings and approach

CDR Recap

CDR in the energy sector

The regulatory framework for the implementation of CDR in the energy sector was completed by Treasury in 2021, including:

- The designation of the energy sector and data holders
- The development of energy specific consumer data right rules
- The establishment of data standards by the DSB

The Consumer Data Right is established primarily through amendments to the Competition and Consumer Act 2010 and the Privacy Act 1988.

- CDR Rules are available here.
- NEL/NER amendments are supporting changes to CDR rather than CDR enabling changes in the energy sector.

Notes

- Meghan Bibby (AEMO) spoke to the introductory slides
- John Adshead (AEMO) gave a recap on CDR in the energy sector

AEMO's revised proposal

Key Changes

- Clarity on the LastConsumerChangeDate definition, to address confusion with CR effective dates or a ‘flag’
- Restructure of transactions to minimise the scenarios where a retailer is required to complete an explicit transaction.
  - Automatically populate the LastConsumerChangeDate for move-in scenario in the CR1030/CR1040 transactions.
  - Change to a new stand-alone transaction to allow the current FRMP to maintain the LastConsumerChangeDate where necessary.
- Visibility to the current FRMPs to enable customer engagement for CDR enquiries/complaints
- Included information on the initial population of the new field.

AEMO's revised proposal

- To support retailers' and AEMO's ability to efficiently respond to an ADR's CDR request, AEMO is proposing to add a "Last Consumer Change Date" field to the CATS_NMI_DATA table with the following requirements:
  - Last Consumer Change Date Definition:
    - The date a new consumer moves into a premises and starts as the account holder.
  - A new stand-alone NMI Details transaction to be created to allow for the current FRMP to maintain this data.
    - As this will be a new stand-alone transaction it will only need to be created when an update to the LastConsumerChangeDate is necessary.
  - For the LastConsumerChangeDate field value/date to be the date supplied by the current FRMP.
    - NB
      - Where a prospective FRMP captures this information as part of the a customer sign on process, the update to the date is to be provided once the prospective FRMP becomes the current FRMP, i.e., following the completion of the customer switch.
      - For the CR's meta data, the actual change date would be the effective date of the completed Change Request.
- In order to recognise the difference between an account holder change for a NMI with no FRMP change and a move-in scenario, AEMO proposes to apply logic to the CR1030/CR1040 transactions to automatically populate to LastConsumerChangeDate field with the date contained in the CR once it goes to a Completed status.

AEMO's revised proposal cont.

- Items of interest:
  - Dates to be provided in C1/C4 reports and notifications to current FRMPs to enable customer engagement for CDR enquiries/complaints regarding length of historical metering data provided in CDR request.
  - Dates will not be included in NMI Discovery to prospective retailers, as AEMO doesn't have a line of sight as to whether the customer the prospective retailer is dealing with is related to the date held in MSATS.
  - The addition of the LastConsumerChangeDate field will enable the ADR to request data for periods prior to the current retailer becoming the FRMP, this eliminates:
    - The need for the current retailer to alter the request from the ADR to correlate with the Last Consumer Change Date, they just pass it through and AEMO will limit the request using the Change Date value.
    - The need for an ADR to otherwise contact multiple Retailers/FRMPs to obtain the information required and retailers having to provide information on past customers (closed accounts).
      - There is also no obligation under CDR for retailers to be contacted about closed accounts.
  - The point of Consumer onboarding by a retailer is the most secure point to capture the information as the process:
    - Includes a Consumer authentication step – "Know your customer".
    - Seeks information on whether a consumer is moving into the premise.

Stand-alone CR Detail

Change Reason Code	Comment
Change NMI Details – Last Consumer Change Date	Used where the Current FRMP is required to make a Retrospective Change to the Last Consumer Change Date.

- Current FRMP to populate the Change Request with the following information, example assumes that the CR is sent on 3 June 2023:
  - Change Reason Code (meta data)
  - Participant Transaction ID (meta data)
  - NMI and NMI Checksum (meta data)
  - Participant ID (meta data)
  - Proposed Change Date (meta data)
  - Last Consumer Change Date (data object)
  - Change Reason Code: xxxx
  - Participant Transaction ID: xyz234726
  - NMI and NMI Checksum:1234567891
  - Participant ID: XYZNRGY
  - Proposed Change Date: 03/06/2023
  - Last Consumer Change Date: 07/02/2020
- 'Last Consumer Change Date' is the relevant date communicating the consumer change.
  - No date restrictions will apply to this value
  - Only validation will be on the date format.
- Meta data restrictions are as per current CR meta data structures, e.g. retrospective periods.

Move In CR1030/1040

Change Reason Code	Comment
1030 – Change Retailer – Move-In	The date of transfer (move-in) is on a Prospective Day
1040 – Change Retailer – Move-In – Retrospective	The date of transfer (move-in) would be on a Retrospective Day.

- Sample: CR sent on 3/6/2023:
  - Change Reason Code: 1030/1040
  - Participant Transaction ID: xyz234726
  - NMI and NMI Checksum:1234567891
  - Participant ID: XYZNRGY
  - Proposed Change Date: 03/06/2023
  - CR Completes 04/06/2023.
  - Actual Change Date: 03/06/2023
  - AEMO applies 03/06/2023 to Last Consumer Change Date field
- 'Actual Change Date' to be reflected in the required 'Last Consumer Change Date' value
- Meta data restrictions are as per current CR meta data structures e.g. retrospective or prospective periods.

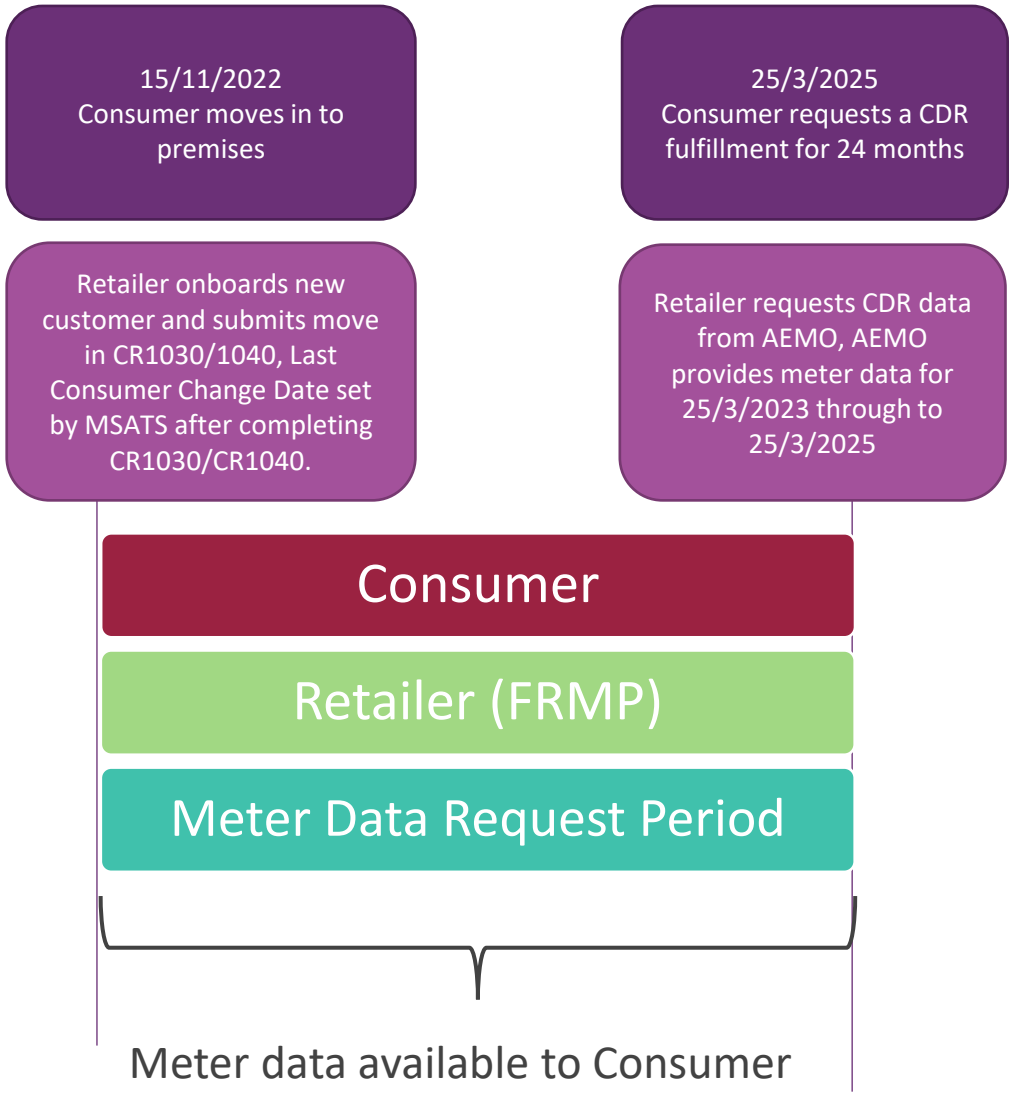
Notes

- Meghan Bibby (AEMO) spoke to the AEMO's revised proposal slides.
  - Mark Riley (AGL) asked how error corrections would be resolved
  - Jackie Krizmanic (AEMO) a full solution for this has not been identified yet but a reversal will reverse it back to its original state – a process would need to be identified
  - Action: AEMO to identify error correction process
  - Helen Vassos (Plus ES) identified data integrity as a risk if participants didn't automate their systems and relied on the prospective retailer to manually update the date on the CR completing
  - Meghan Bibby (AEMO) noted that when a move in CR is used, the last consumer date would be provided
  - Rob Lo Giudice (Alinta) asked if the last consumer date is not a mandatory field in the move in CR's how will it be monitored?
  - Jackie Krizmanic (AEMO) noted it would not be mandatory in the move in CRs, but mandatory in the new last consumer CR type. Retailers have CDR obligations to provide the date under the regulatory framework.
  - Jeff Robers (Evo) asked what would stop a new retailer who wins the site raising the CR anyway?
  - Jackie Krizmanic (AEMO) noted they would need to be the existing retailer or it would be rejected
  - Mark Riley (AGL) asked how quickly a C4 report would be provided with the date for call centre purposes?
  - Jackie Krizmanic (AEMO) the completed notification will include the date.
  - Helen Vassos (PLUS ES) asked if the information would provided to all participants responsible for the NMI?
  - ACTION: Helen's to raise this question via the ERCF
  - Jamie Saxon (Red) noted he believed the "know your customer" step in the process is not addressed in the solution
  - ACTION: Guy Richardson (Treasury) to take on notice
  - Christophe Bechia (Red) agreed with Jamie's concerned and noted it has never been a requirement for retailers to have a robust onboarding process for customers

Use Case Walkthrough

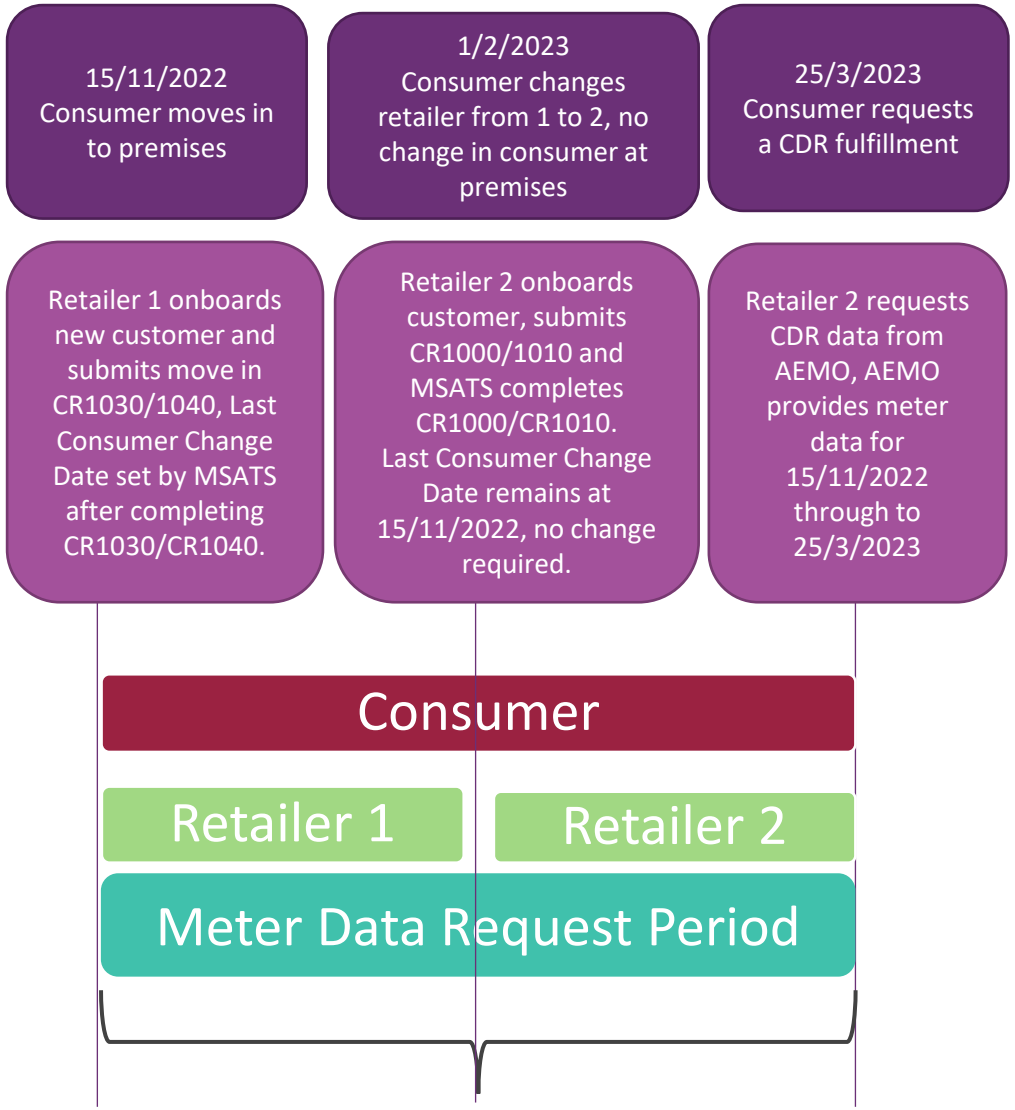
- Key CDR elements:
  - CDR only allows the current account holder to access the data for the NMI
    - If there has been a change in account holder, any previous account holders cannot authenticate so do not have access
  - CDR standards apply
    - If the retailer gets a CDR request, then the retailer passes through the request to AEMO. AEMO then determines the applicable period by using the current 'Last Consumer Change Date'
- For setting the LastConsumerChangeDate, from a retailer perspective:
  - A person approaches a Retailer wanting to become a customer
    - The Retailer asks/establishes if the customer is moving into the property or if they are just changing retailers
    - A move-in requires the LastConsumerChangeDate to be updated, a change of retailer does not.
  - An existing customer approaches wanting to change the name on the account
    - Retailer uses their existing processes (unknown to us) to establish if this requires a new 'clean' account or a change of name to the existing account.
    - A new account requires the LastConsumerChangeDate to be updated, a change of name to an existing account does not.

1 - Base Scenario – Single Consumer, Single Retailer



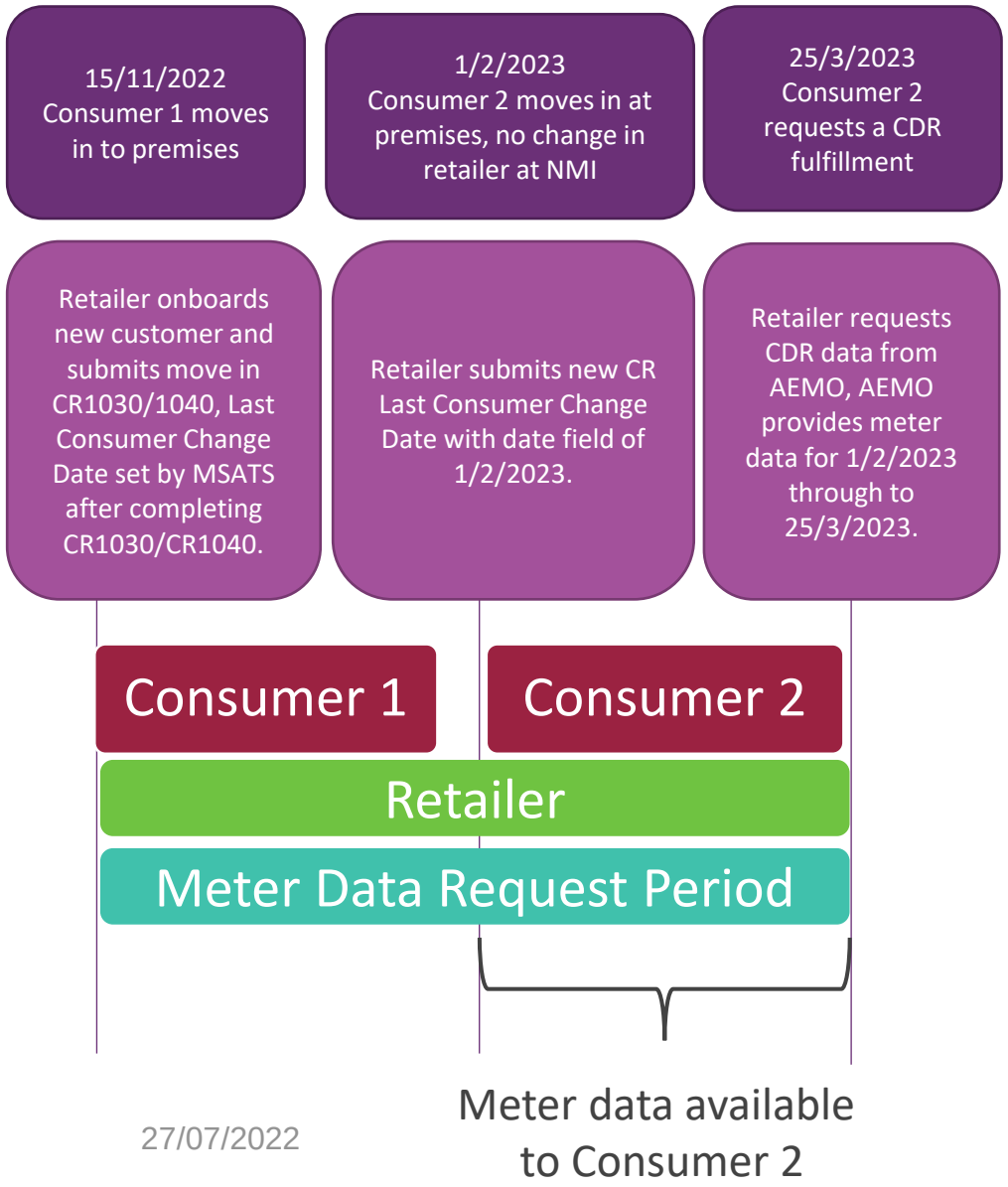
- Meter data is requested for a period within 24 months
- The consumer is a customer of a single retailer for the full date range of the request
- **Current model supports this scenario**
  - Under CDR the Consumer as account holder has access to data requested
  - The Retailer already knows the Consumer has been at that service point for more than the request period
- **The new MSATS field also supports this scenario.**
  All of the data for the request period will be made available back until the LastConsumerChangeDate.
  - The date would be set by MSATS when the Consumer moves in through the CR1030/1040 process.

2 - Single Consumer – Change of Retailer



- Meter data is requested for a period within 24 months.
- The consumer has been a customer of multiple retailers during the meter data request period.
- **Current model does not support this scenario**.
  - Currently under CDR, the consumer can only access meter data for the period they were with Retailer 2.
- **The new MSATS field supports this scenario.**
  All of the data for the request period will be made available back until the LastConsumerChangeDate.
  - The date would be set by Retailer 1 when the Consumer moves in and **not reset** by Retailer 2 in the event of a change of retailer only.

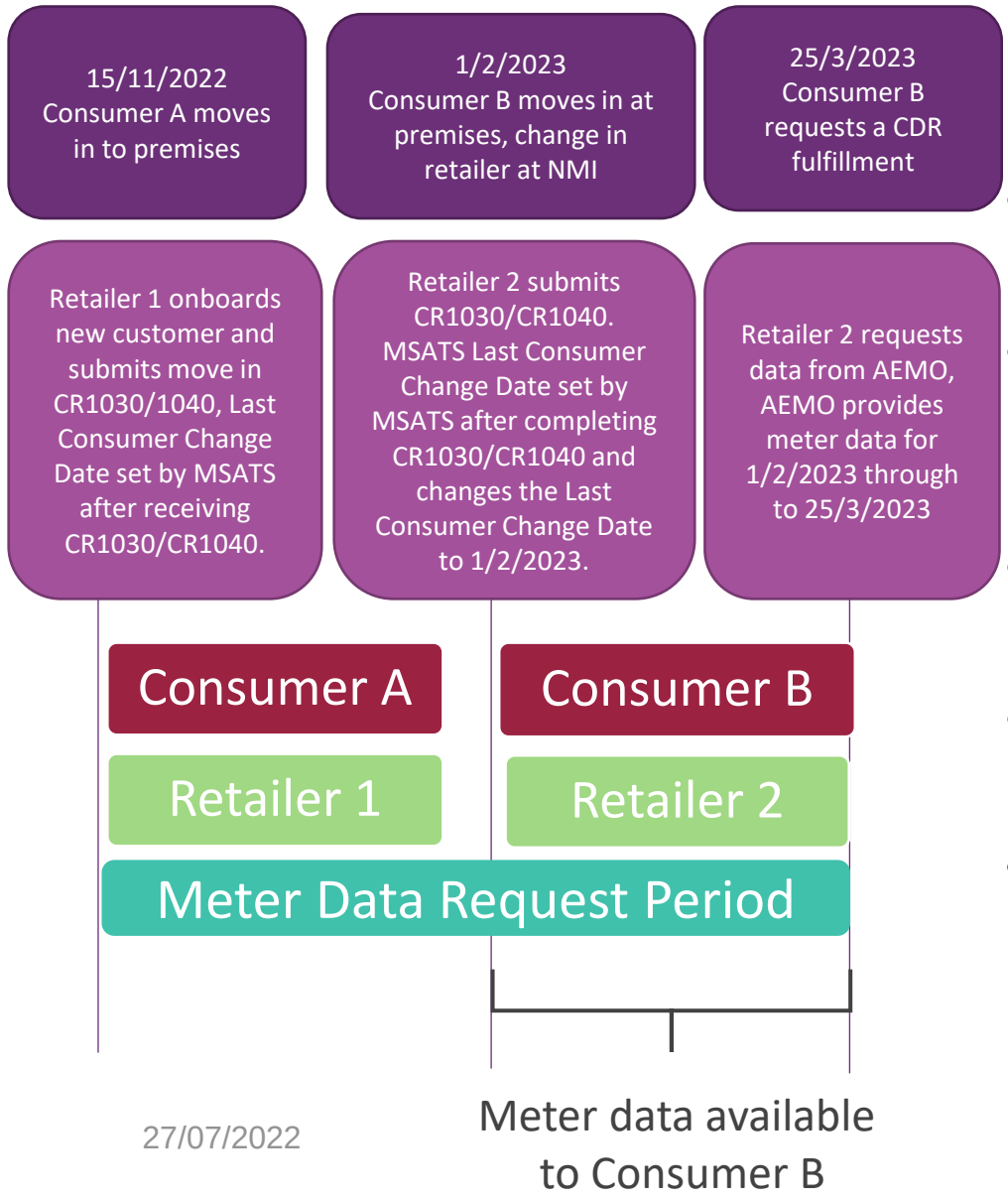
3 - Multiple Consumers – Single Retailer / Move In



- Meter data is requested for a period within 24 months for the **current** consumer.
- The request covers a date range that includes a period before the consumer moved into the premise.
- Meter data is only to be provided for the period Consumer 2 is responsible.
- **Current model supports this scenario**
  - Only data for the period Consumer 2 is the account holder is available
- **The new MSATS field also supports this scenario.**

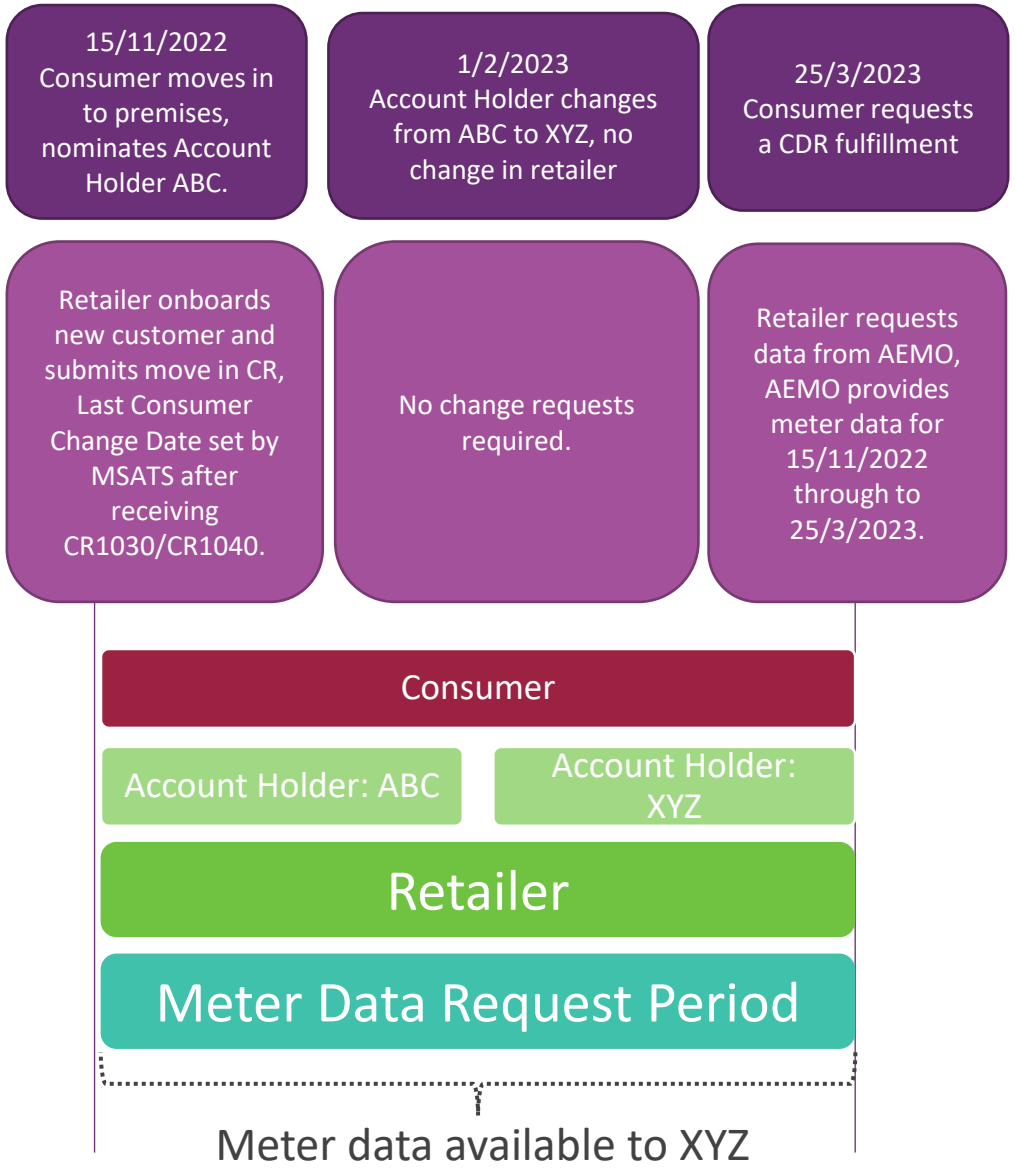
  Data will be made available back until the Last Consumer Change Date
  - The date initially set by the Retailer when Consumer 1 moves in through the CR1030/1040 and is reset when Consumer 2 moves in through the new CR LastConsumerChangeDate

4 - Multiple Consumers – Change of Retailer with Move In



- Meter data is requested for a period within 24 months for the **current consumer**.
- The request overlaps with a change in consumer where the new consumer has moved into the premise and selected a different retailer.
- Meter data must only be provided for the period that the current consumer is responsible for.
- **Current model supports this scenario**
  - Only data for the period Consumer B is the account holder is available
- **The new MSATS field also supports this scenario.**
  Data will be made available back until the Last Consumer Change Date.
  - The date initially set by the Retailer 1 when Consumer A moves in through the CR1030/1040 and is reset by Retailer 2 when Consumer B moves in through the CR1030/1040.

5 - Change of Account Holder – Authorised Party



- Meter data is requested for a period within 24 months for the **current** account holder.
- Responsibility was transferred from one primary account holder to another during the request period. For example: a business consumer where the primary account holder leaves the business and is replaced by another.
- Data can be returned for the full request period where the consenting party is XYZ. Requests where the consenting party is ABC can no longer be authenticated.
- **Current model supports this scenario**
  - Under CDR the account holder XYZ has access to all the data requested
- **The new MSATS field also supports this scenario.**
  Data will be made available back until the Last Consumer Change Date.
  - When transferring between Account Holders ABC and XYZ, the retailer uses their existing protocols to allow the transfer (assumed in this case)

Notes

- John Adshead (AEMO) spoke to the use case scenarios
  - Shaun Cupitt (Enerven) noted the issue with multiple tenants living at one home e.g. share house
  - Jamie Saxon (Red) noted it would depend on the retailers processes and how they authenticate. CDR supports authorised parties.
  - James Bligh (DSB) noted there is also onus on the consumer to arrange their affairs so data can be shared
  - Guy Richardson (Treasury) noted there are protections in the CDR and CCA for disclosure of data e.g. the good faith clause, to mitigate against liability if a consumer has misled a retailer. Part 4 allows retailers to refuse to disclose data if it will cause physical or psychological or financial harm to other people
  - Jamie Saxon (Red) noted when a consumer leaves a premise they no long have access to historical data for that premise
  - Giuseppe Coppola (AGL) asked if metering data comes out of closed account rules
  - James Bligh (DSB) noted metering data is in for closed accounts under invoicing and billing.
  - ACTION: closed accounts is a valid scenario to be taken offline and make sure that the rules are amended, to enable that scenario to occur.

Options analysis

Options analysis

Description	Pros	Cons
ADR Led	• Seen by retailers as the point where a consumer is requesting the CDR service, therefore, should be the time when the consumer is authenticated.	• Retailers would have to maintain previous consumer details (consumer history) to support/validate an ADR request. • Consumers would need provide evidence to the ADR to confirm how long they have been at the premise. • ADR validation processes would need to be established

B2B Solution Based	• Existing flow of customer name via Customer & Site Details Notification (CSDNs)	• CSDNs do not adequately identify when customers change at a NMI
		  • Example:
		  • CSDN 1: J Smith
		  • CSDN 2: John Smith
		  • Name has changed but there is no identifier to advise if the customer has changed or it has simply been an update to an existing customer's name
		• AEMO does not read the CSDN files, only passes them through between participants (mailbox)
		• CDR APIs gather data from B2M processes and B2B does not interact with B2M.
		• To enable this option would require a change to:
		  • CSDN B2B communication for a retailer to identify if it is a customer change; and
		  • Introduce the Last Consumer Change Date field into MSATS; and
		  • Introduce interactions between B2B and B2M to apply the date in MSATS.

Options analysis

Description	Pros	Cons
'Change Retailer Insitu' CRs	• Existing retailer transfer CRs and processes • Avoids duplication for move in CR 1030/1040	• Does not identify a new customer, same retailer scenarios via CR1000/1010 (Scenario 3 in revised proposal). • CR1000/1010 only provides change in FRMP.
AEMO's original proposal (CR5054/55)	• Established retailer CR and process	• Affects the updating of the Customer Classification Code value • Requires the Last Consumer Change Date for move-in scenarios, duplicates move-in transfer CR1030/1040 processes.

Notes

- Meghan Bibby (AEMO) spoke to the option analysis slides
  - Jamie Saxon (Red) noted that it was unlikely that retailers would delete historic information less that two years old – having retailers retain the information for two years and ADR requests to retailers would be a better solution
  - ACTION : James Blight (DSB) noted the question could be asked again
  - Mark Riley (AGL) noted this solution would potentially mitigate family violence issues

Confirmation of the preferred solution for the Draft report

Discussion on AEMO's Revised Proposal

Notes

- Blaine Miner (AEMO) asked participants which solution should be put forward in the draft report
- ACTION: James Bligh (DSB) to schedule a DSB facilitated workshop to include the business and technical leads to discuss and decide the solution
- The meeting was closed and no further slides were presented in the workshop

Initial data population options

Initial population options

Options for the initial population of the Last Consumer Change Date.

No.	Description	Net result for consumers	Comments
1	Do not initialise	Consumers can access data for their current Retailer relationship (no change). If the Consumer changed retailer access to historical data would not be available unless the Consumer works with Retailer to set the Last Consumer Change date.	Simple implementation and existing access maintained for early adopters of CDR, however, it leaves a future exception flow to the next in-coming retailer in the case of an in-situ switching to set the Last Consumer Change date for consumers using CDR.
2	Set the initial Last Consumer Change Date to a fixed date (30 May 2023)	Consumers receive data from the fixed date, however, a consistent point is set and within 12 months all consumers would have a useful set of data. In the interim consumers using CDR could work with Retailer to set the Last Consumer Change date	Simple implementation but a poor outcome for early adopters of CDR and retailers needing to manage exception flows to set the Last Consumer Change date.
3	Set the initial Last Consumer Change Date to the start date of the current NMI to FRMP relationship.	Consumers can access data for their current Retailer relationship (no change). If the consumer changes retailer (in-situ) access to historical data will be maintained.	Data access maintained for early adopters of CDR. For retailers that are the current FRMP across multiple consumers (Use Case 3: Multiple Consumers - Single Retailer) the Last Consumer Change date would need to be updated to reflect the current consumer.
4	Set the initial Last Consumer Change Date to the later of: • current FRMP Start Date • Twelve months prior (30 May 2022) • Latest disconnection date • ….. other information	Consumers can access data for their current Retailer relationship (no change). If the consumer changes retailer (in-situ) access to historical data will be maintained.	Data access maintained for early adopters of CDR. This option extends option 3 (above) to use other information and a 12-month window to reduce the number of exceptions to be managed by retailers that are the current FRMP across multiple consumers.

How the CDR “Get Usage” API works

How the CDR "Get Usage" API work
CDR Day 1 - initial process

The CDR API Get Usage For Service Point is used by the Accredited Data Recipient (ADR) to retrieve meter data across a date range.

From the start of CDR tranche 1 (15 November 2022) the Retailer processing a Get Usage request will need to adjust the date range parameters to be within the time frame of their relationship with the consumer. The driver for this requirement is Use Case 3: "Multiple Consumers - Single Retailer" where the FRMP relationship in MSATS is longer than the current consumer relationship. The process will work as follows:

1. ADR API Request parameters

   `oldest date:` ADR "oldest-date"

   `newest date:` ADR "newest-date"

2. Retailer API Request parameters

   `oldest date:` Max(ADR "oldest-date", **Customer start date**)

   `newest date:` ADR "newest-date"

3. AEMO API Request parameters to Source

   `oldest date:` Max(Retailer "oldest-date", FRMP start date, Today – 24 months)

   `newest date:` Retailer "newest-date"

How the CDR "Get Usage" API works with the Last Consumer Change date

When the Last Consumer Change date feature is introduced there is no longer a requirement for the Retailer to adjust the date range requested. The request will support retrieval of meter data beyond the current retailer relationship if appropriate. The process will work as follows:

1. ADR API Request parameters
   - `oldest date: ADR "oldest-date"`
   - `newest date: ADR "newest-date"`
2. Retailer API Request parameters
   - `oldest date: ADR "oldest-date"`
   - `newest date: ADR "newest-date"`
3. AEMO API Request parameters to Source
   - `oldest date: Max(Retailer "oldest-date", Last Customer Change date, Today – 24 months)`
   - `newest date: Retailer "newest-date"`

If implemented in May 2023 there is reduced work for CDR Tranche 3 Retailers (1 November 2023) as the ADR parameters can be simply passed through.

Scenarios

Family violence scenario

Move in date

- Retailer: ABC
- 31/3/2006: Brad & Frankie (partners), move in to 8 Smith St, Smithville
- Electricity account in Brad's name with Frankie as authorised party.

Last Consumer Change Date revised

- Retailer: ABC
- 5/8/2020: Brad & Frankie separate. Family violence was involved and Brad has moved out. Frankie establishes account in their name only with a family violence flag associated to the account.

Last Consumer Change Date revised

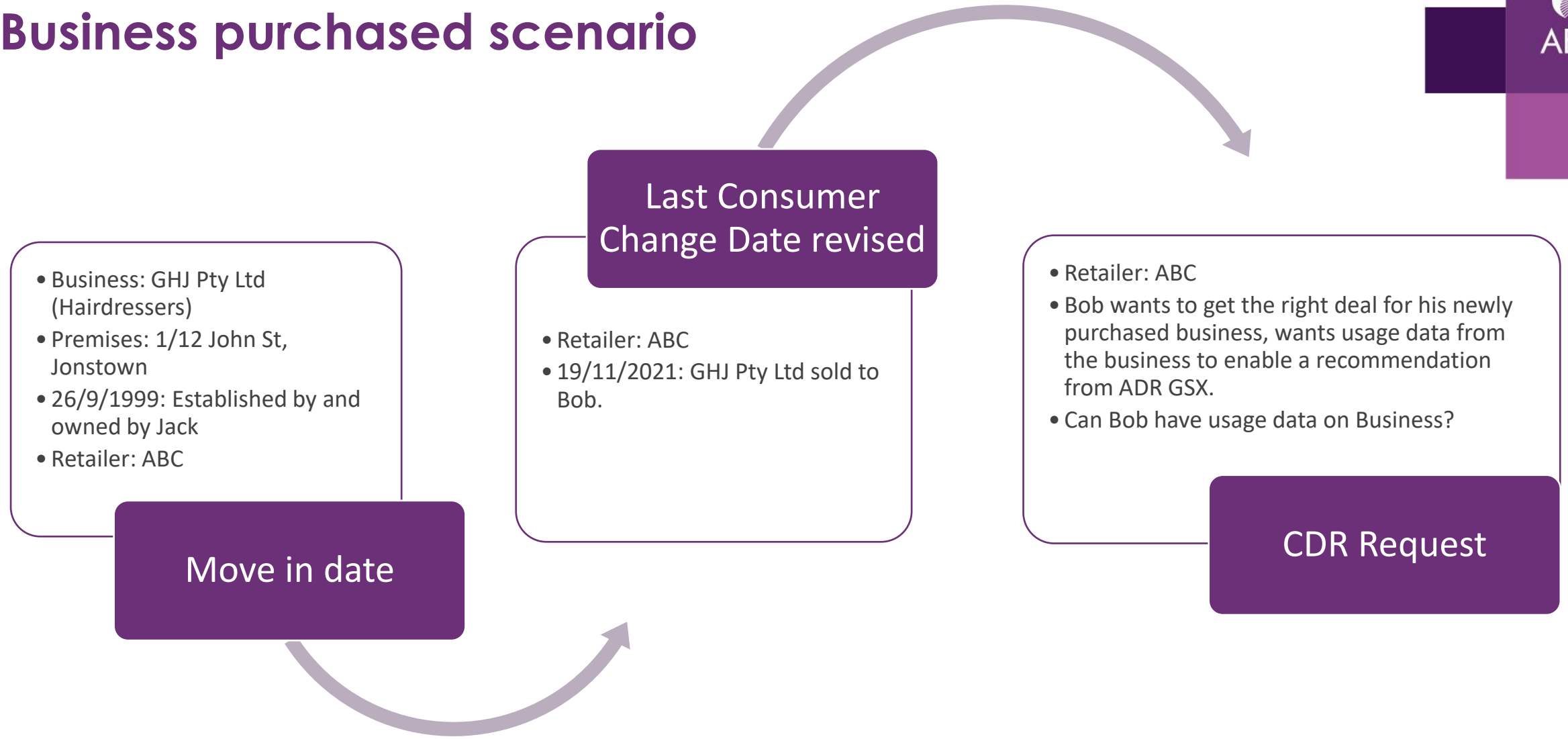
- Retailer: STQ
- 15/12/2021: Brad signs up to Retailer STQ for premises 8 Smith St, Smithville, advises Retailer STQ he is an in-situ churn and has been at the premises for since 31/3/2006, provides bill from 18 months ago as evidence.
- Retailer STQ changes Last Consumer Change Date back to 16/6/2020 based on bill supplied by Brad
- Retailer STQ unaware Brad does not live at 8 Smith St, Smithville and the family violence situation.

CDR Request

- 17/12/2021: Brad asks ADR DEF for a review of his data going back 2 years
- CDR data request provides metering usage data in 5 minute intervals to Brad back to 16/6/2020
- This covers the period where the premises is only lived in by Frankie.

Thoughts on mitigation options?

Business purchased scenario



Thoughts on options?

Any other edge scenarios?

- Request for provision via email (ercf@aemo.com.au)

Next steps

Next steps:

- AEMO will consider feedback provided in submissions and workshops to form its Draft Report position.

- Consultation:
  - Draft Report due to be published Friday 29 July 2022
  - Submissions close Monday 22 August 2022 (extra week provided)
  - Final Report due to be published Monday 3 October 2022

For more information visit

aemo.com.au