



31 March 2022

Ms Violette Mouchaileh  
Executive General Manager, Reform Delivery  
Australian Energy Market Operator

by email: [violette.mouchaileh@aemo.com.au](mailto:violette.mouchaileh@aemo.com.au)  
cc: [luke.barlow@aemo.com.au](mailto:luke.barlow@aemo.com.au)

Dear Ms Mouchaileh

**MSATS STANDING DATA RELEASES – PROPOSAL TO SUPPORT CDR ENERGY IMPLEMENTATION**

I am writing to request that AEMO considers implementing changes to NMI standing data that would enable consumers to derive greater value from their electricity consumption data under the Consumer Data Right (CDR).

I understand that over 2022 and 2023, AEMO will undertake several “MSATS Releases” that will involve introducing new fields and modifying existing fields of NMI Standing Data. AEMO was requested in 2020 by the ACCC (as the then rule-maker for the CDR rules) to consider certain changes to NMI standing data fields to support the implementation of the CDR in energy. At the time, AEMO received feedback from electricity industry participants that consideration of any such changes should be deferred until the CDR rules for the energy sector were made.

With AEMO now designated as the data holder for NMI standing data, and rules for the energy CDR now implemented, I would appreciate if AEMO could consider the content of NMI standing data fields as part of its MSATS Releases, to determine whether additional data fields are required to support the CDR. Treasury requests AEMO to introduce a new data field to indicate when a National Metering Identifier (NMI) has changed account holder. This would enable AEMO to release sufficient metering data to meet use cases in circumstances where a consumer has changed retailers during the period for which they wish to share their metering data with an accredited third party. The introduction of such a field would ensure that when sharing of a consumer’s energy data occurs following authentication by the consumer’s current retailer, metering data is provided for the time that the CDR consumer was associated with the NMI. Without information about when a NMI has changed customer, AEMO can only release metering data from the time that the CDR consumer’s current retailer can verify they are associated with the NMI.

A field or flag indicating when a NMI has changed customer would enable the sharing of more historical metering data in response to one-off requests, but is also relevant where there is an ongoing data sharing arrangement. Treasury would be pleased to discuss these issues with you further. In the meantime, if you have any questions, please contact Wendy Hau, Director, Rules for New Sectors Unit, Consumer Data Right Division at [wendy.hau@treasury.gov.au](mailto:wendy.hau@treasury.gov.au) or (02) 6263 3966.

Yours sincerely,

Kate O'Rourke  
First Assistant Secretary  
Consumer Data Right Division, Markets Group