

27 September 2022



Mr Daniel Westerman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

Submitted via email to NEM.Retailprocedureconsultations@aemo.com.au

Dear Mr Westerman

Energy Queensland submission to Consumer Data Rights MSATS Consultation – Part 2

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on its *Consumer Data Rights MSATS Consultation – Part 2*.

This submission is provided by Energy Queensland, on behalf of its related entities, specifically:

- Distribution network service providers, Energex Limited and Ergon Energy Corporation Limited; and,
- Retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail).

Energy Queensland's comments on the proposed amendments are included in the attached AEMO response template.

Should AEMO require additional information or wish to discuss any aspect of this response, please contact me on 0429 394 855 or Laura Males on 0429 954 346.

Yours sincerely,

A handwritten signature in blue ink that reads "Alena Christmas".

Alena Christmas
Acting Manager Regulation

Telephone: 0429 394 855
Email: alena.christmas@energyq.com.au

Encl: Energy Queensland comments on proposed procedure amendments

CONSUMER DATA RIGHT (CDR) MSATS CONSULTATION – PART 2

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Ergon Energy Retail, Ergon Energy Network, Energex

Submission Date: 27/09/2022

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the 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. Question on initial population of the Last Consumer Change Date

Heading	Participant Comments
Which of the proposed initial population options does your organisation prefer and why?	Energy Queensland prefers Option 1, with Option 4 as second preference.
Is there an alternative initial population option you believe would better achieve the desired objectives?	Energy Queensland offers no alternative.
What do you believe should be considered in implemented your preferred initial population option?	Energy Queensland offers no comment.

3. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
2.10 AEMO	<p>Addition of:</p> <p>(p) Populate the Last Consumer Change Date upon completion of Change Requests 1030 and 1040. The Last Consumer Change Date will be populated with the Actual Change Date of the Change Request.</p>	Energy Queensland offers no comment
12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	<p>Energy Queensland considers that the limitation of retrospective change to 1 business day is a misunderstanding of normal industry practice enabled in the timeframe rules. If a financially responsible market participant is able to retrospectively change retailer up to 65 business days (refer to clause 6.1.6, Table 6-A) or retrospectively correct an erroneous churn date up to 130 days (refer to clause 6.2.6, Table 6-D), then we suggest that it is appropriate for a similar allowance for this change request.</p> <p>Without an appropriate (longer) retrospective change period, customers will not be able to access data they should be entitled to, a situation which appears to be contrary to the intent of the Consumer Data Right.</p>
Table 16-C – NMI Standing Data Items and CATS Standing Data	Addition of ‘Last Consumer Change Date’	Energy Queensland offers no comment.

NMI Discovery Data Access Rules		
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4. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	As noted above in relation to CATS 12.5, Energy Queensland suggests the need for consistency with other timeframes for retrospective change.

5. Standing Data for MSATS

Section	Description	Participant Comments
7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions	Addition of ‘Last Consumer Change Date’	Energy Queensland offers no comment.

7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	Energy Queensland offers no comment.
7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	Energy Queensland offers no comment.