

CONSUMER DATA RIGHT (CDR) MSATS CONSULTATION – PART 2

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Alinta Energy

Submission Date: 27th September 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?	Alinta Energy does not believe any of the population options fully captures the requirements of the ‘last consumer ‘actual’ change date’.
Is there an alternative initial population option you believe would better achieve the desired objectives?	Not specifically. Alinta still believes this information can be captured by certain B2B transactions that AEMO would need to interrogate via the B2B hub.
What do you believe should be considered in implemented your preferred initial population option?	Alinta believes a compliance holiday post November 2023 for tier 2 retailers should be considered since this obligation on CDR activities does not begin until November 2023 for tier 2 retailers.

3. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
2.10 AEMO	Addition of: <i>(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.</i>	Is this a one off activity by AEMO or an ongoing piece that AEMO will build into logic? If so, what about transfers that did not involve a 1030 or 1040? 1000's, etc?
12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	Understood. Potential new NMI classifications should be considered here.
Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of 'Last Consumer Change Date'	Understood.

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	Understood.

5. Standing Data for MSATS

Section	Description	Participant Comments
7.1 Field Definitions Table 12 CATS_NMI_DAT A – Field Definitions	Addition of 'Last Consumer Change Date'	Alinta believes there needs to be clarity on when AEMO will/has populated versus when the FRMP will/has populated.
7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	Understood.
7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	Understood.

May 2023 Obligation	'Last Consumer Change Date'	Alinta Energy does not believe the obligation to populate this field in May 2023 applies to tier 2 retailers. CDR Obligations do not apply to tier 2 retailers until November 2023.
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