

CONSUMER DATA RIGHT (CDR) MSATS CONSULTATION – PART 2

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

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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. General position

Red Energy and Lumo Energy (Red and Lumo) strongly oppose AEMO's decision to force all retailers, irrespective of their actual obligations and timeframes under Consumer Data Right (CDR), to populating the new Last Consumer Change Date field (LCCD) in MSATS from 30 May 2023. There are no obligations, under the CDR rules or framework, imposed on second tier retailers who are not early adopters to provide any customer data prior to 1 November 2023.

It is inappropriate for AEMO to impose a requirement on all retailers, prior to those retailers having obligations under the CDR framework. AEMO's position in its draft report that *the addition of the "Last Consumer Change Date" field will enable the current retailer to request data for periods prior to them becoming the FRMP* is only accurate once it applies to a retailer with an obligation under CDR to request and provide the data. This is not the case for the majority of retailers as of 30 May 2023.

Should AEMO continue with this questionable approach to force this field as a mandatory field for all retailers, it is Red and Lumo's firm position that the effective date of 30 May 2023 is unreasonable. Though the technical solution is sound in principle, further work needs to be undertaken to operationalise it - both in terms of CDR APIs but also specifically in day to day management of the change requests (CRs).

The MSATS Procedures must clearly articulate the business rules that apply in relation to the use of the new field. Failing to do so will lead to retailers building their own solutions to populate the field in an inconsistent manner. Which could take time to then undo or fix up later on once it has been determined that there is inconsistency across the industry. We propose that the CATS procedure be amended as it is the best place to capture the manner in which the obligations apply.

There are a myriad of scenarios which the industry needs to work through in order to determine when and how the field is most efficiently and accurately populated. This is particularly the case as there are varying views amongst some retailers on the use of the LCCD field and what would trigger this field needing to be changed. There needs to be clarity and a consistent approach to ensure complete data integrity and reliance. We request that the operationalisation of the LCCD field can be achieved through an initial series of AEMO run workshops with participation open to all retailers to attend and contribute in order to define the operational element sitting behind the technical solution. It is only at the completion of these workshops that AEMO can make any final decisions in relation to the CATS and MSATS Procedures and associated publication of technical documentation, as inconsistency in the application of this field will give rise to all the risks and issues that Red and Lumo raised in the initial consultation.

Following these workshops, Red and Lumo (and presumably retailers more generally) will need time to build any mechanism in our systems, which may be complex in nature, to manage the triggers of the newly proposed CRs for each scenario discussed. We envisage that the network and metering businesses may also wish to consider the data within this field as it should correspond to the information updates they receive for a CDN, and if no CDN is received, they may wish to trigger a CDR (CDR in the traditional definition - the customer details request not the consumer data right). This will include undertaking a full suite of tests, both internally and at an industry level between AEMO and other participants. Including any subsequent exception management processes to be developed. All of which will require an investment of time, resources, and costs - at a time during which retailers are already spread very thinly working on initiatives outlined in AEMO's roadmap alongside other jurisdictional changes. Not to mention internal programs of work which may already be underway or planned. Red and Lumo have already committed our resources over the next 6-12 months to various projects - industry led, regulatory, and internal projects - including CDR.

As it highlighted at the AEMO and Treasury-led workshops on this issue, and the initial responses to the first round of this consultation, retailers have concerns with regards to potential data privacy breaches. AEMO's position in its draft report is that it *considers the customer, privacy and liability issues raised by the respondents fall outside of AEMO's remit and should be raised with the appropriate government bodies to be considered outside this Consultation*. Commencement on 30 May 2023 does not allow sufficient time for retailers to pursue these other avenues should they wish to do so, and implement any subsequent changes in a timely manner.

3. Question on initial population of the Last Consumer Change Date

| Heading | Participant Comments |
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| <p>Which of the proposed initial population options does your organisation prefer and why?</p> | <p>Red and Lumo position on each option is as follows:</p> <p>Option 4 carries the most risk. Pre-population of the Last Consumer Change Date field (LCCD) by AEMO using this option will see a myriad of dates populated. This will question the integrity of the data. Current FRMPs and prospective FRMPs will not know whether the LCCD is accurately populated.</p> <p>Even if requesting retailers (current FRMP) to update the date if they have multiple consumers across their FRMP period, this will take time and a prospective FRMP will not know whether the date was updated by the previous FRMP or not.</p> <p>Option 2 also renders the data in MSATS as unreliable. Any actual consumer change taking place on 30 May 2023, will not need to have the LCCD modified - however, as this is the default date for all cases the question will remain whether the date is correct or is yet to be amended - which will be an issue for prospective FRMPs who cannot validate this date. AEMO will not be able to confidently confirm if the update of the LCCD has taken place or not.</p> <p>Option 1 delivers a level of certainty of the integrity of the LCCD. When a field is populated it provides participants with the assumption that the information is correct. However, it does mean that until the field is populated it is somewhat redundant.</p> <p>Option 3 does provide a level of accurate data where there has been no change in customer at the premise with that retailer that has become the FRMP. There would be certain exceptions that would need to be accounted for - such as any inflight prospective or retrospective change requests.</p> |

| Heading | Participant Comments |
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| <p>Is there an alternative initial population option you believe would better achieve the desired objectives?</p> | <p>An alternative will see a combination of option 3 (populate with the last FRMP date), combined with a mechanism for retailers to provide a list of dates for AEMO to be uploaded in bulk where there has been a change of customer during the current FRMP period.</p> <p>AEMO will need to work with all retailers to provide a solution to assist in the population of the field, minimising efforts of time and resources - such as utilising the BUT (bulk update tool). This would require a joint and coordinated effort between retailers and AEMO so all data can be uploaded within a short window to avoid long delays of data not being completely accurate. The approach will also require commitment from AEMO to load the data in a timely manner to avoid any data accuracy being lost as consumers change during the period the data is being uploaded.</p> <p>Red and Lumo would be able to consider this data extraction as a part of the scope and delivery of CDR in November 2023.</p> |
| <p>What do you believe should be considered in implemented your preferred initial population option?</p> | <p>AEMO should consider the impact on second tier retailers who are not early adopters and have no obligation under the CDR rules or framework to provide any customer data prior to 1 November 2023.</p> <p>AEMO must also consider the NEO in making its decision of which option is best suited, specifically which options are least costly and have the highest actual benefit realisation – ultimately deciding what is in the long term interests of consumers. Not the short term interests of having MSATS populated.</p> <p>Pre-population of the field can only be determined once business rules and procedures have been finalised, and all are agreed on what information will be captured by this field (i.e. move in date, move out date, unknown consumer start date).</p> <p>Finally, the option needs to take into consideration the potential for inaccuracy in data population, specifically over a period of time. Whilst AEMO can pre-populate the field with what is deemed the most</p> |

| Heading | Participant Comments |
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| | <p>up-to-date information it has access to, unless action is taken in a timely manner to verify and correct the information by the current FRMP, there is a risk for this data to become corrupt and inaccurate (i.e. a prospective FRMP becoming financially responsible for a NMI before the current FRMP has a chance to update the field since only the FRMP can update it).</p> |

4. MSATS Procedures: CATS Procedure Principles and Obligations

| Section | Description | Participant Comments |
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| 2.10 AEMO | <p>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></p> | <p>Red and Lumo recommend AEMO add a similar obligation under 2.2 for new and current FRMP to populate the LCCD field using CR5056/5057. The specifics of when the field needs to be updated will have to be decided at the workshops and reflected into the MSATS Procedures as proposed in our 'General Position' section of this paper.</p> |
| 12.5 Change NMI – Last Consumer Change Date | <p>Addition of section 12.5 Change NMI – Last Consumer Change Date</p> | <p>Red and Lumo seek clarification from AEMO in regards to the use of CR5057 (Used where the Current FRMP is required to make a Retrospective Change to the Last Consumer Change Date) in the following example. These are examples of scenarios which will require to be worked through at the workshops as proposed in our 'General Position' section of this paper.</p> |

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| | | <p><u>Scenario 1:</u></p> <p>A retailer has been FRMP for a site from 1 Jan 2024 with one customer at the site the entire time who moved in on 30 June 2023 - current Last Consumer Change Date (LCCD) shows 30 June 2023.</p> <p>On 1 Jan 2025 a new customer calls up for a move in from 10 Jan 2025. FRMP arranges the move-in and updates the LCCD field prospectively with a date of 10 Jan 2025.</p> <p>On 4 Jan 2025 current customer calls up to say they are moving out as of 7 Jan 2025.</p> <p>On 6 Jan new customer calls up to advise they are no longer moving in to the property.</p> <p>So now we have the current customer moving out 7 Jan 2025 (has been living there since 30 Jun 2023), LCCD is pending a CR to show 10 Jan 2025 or if the retailer has made the proposed changed date in the CR earlier than the LCCD field then the LCCD is no longer correct as we do not have a new customer confirmed.</p> <p><u>Scenario Questions:</u></p> <p>a> Can the FRMP use the retrospective CR to amend the date of the LCCD and how far back can the date be changed to?</p> <p>b> Clause 12.5.5 states: <i>When preparing a Change Request, the Current FRMP must choose a Proposed Change Date that lies between the Prospective Period and Retrospective Period, as shown in Table 12-1.</i> However, the retrospective date only allows for 1 business day for the proposed changed date. Can the retrospective LCCD go as far back as is required (more than 1 business day)?</p> |
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| | | <p>c> In this scenario would the retrospective LCCD be changed back to 30 Jun 2023 to match the current customer was the account holder from at the property? Or would it need to be changed to 7 Jan 2025 to match with the date the current customer is moving out - even though we don't have a new customer confirmed as moving in as yet?</p> <p><u>Scenario 2:</u></p> <p>A retailer has been FRMP for a site from 1 Jan 2024 with one customer at the site the entire time who moved in on 30 June 2023 - current LCCD shows 30 June 2023.</p> <p>On 4 Jan 2025 current customer calls up to say they are moving out as of 7 Jan 2025.</p> <p>Today is 8 Jan 2025, old customer has moved out, no new customer moving in.</p> <p><u>Scenario Questions:</u></p> <p>a> No consumption is seen at the property which remains vacant. Do we update the LCCD to 7 Jan 2025 based on the old customer moving out, or do we not update the field until a confirmed customer moves in?</p> <p>b> If the LCCD is not based on the move out but instead on a new customer moving in, and we observe consumption (unknown consumer). Can we change the LCCD based on consumption presented even if no formal customer details have been confirmed (unknown consumer account set up date)?</p> |
| <p>Table 16-C – NMI Standing Data Items and CATS Standing Data NMI</p> | <p>Addition of 'Last Consumer Change Date'</p> | <p>Noted.</p> |

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

| Section | Description | Participant Comments |
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| 7.3 Change NMI – Last Consumer Change Date | Addition of section 7.3 Change NMI – Last Consumer Change Date | Noted |

6. Standing Data for MSATS

| Section | Description | Participant Comments |
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| 7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions | Addition of ‘Last Consumer Change Date’ | <p>Red and Lumo request that AEMO be added as a ‘Party to Provide’ considering that they will be populating this field off the back of a CR1030/1040 completion. Or for this to be called out in the description, removing any assumption that the FRMP needs to raise a CR5056/5057 in the instance that a CR1030/1040 is completed.</p> <p>Red and Lumo suggest that the description may also require further rewording after the workshops as proposed in our ‘General Position’ section of this paper have been completed. Such as if it is agreed to update the field at the time of a customer moving out.</p> |

Metering Procedure Changes

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| 7.2 Table 13 CATS_NMI_Data | Addition of 'Last Consumer Change Date' | Noted. |
| 7.3 Table 14 CATS_NMI_Data Field value examples | Addition of 'Last Consumer Change Date' | Noted. |