



Consumer Data Right MSATS Procedures

Minor Amendments Determination for
the National Electricity Market

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Australian Energy Market Operator Ltd ABN 94 072 010 327

Notice of determination on minor rules consultation procedure

AEMO has made a final determination to make the minor or administrative change to delay the effective date of the Last Consumer Change Date (“**LCCD**”) field in respect of the following Procedures:

- MSATS Procedures: CATS Procedure Principals and Obligations.
- MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and SAMPLE (WIGS) NMIs.
- Standing Data for MSATS document.

At the request of AGL, Energy Australia and Origin Energy, AEMO has undertaken the consultation (“**Consultation**”) on the proposed minor or administrative changes (“**Proposal**”) to defer their obligations to populate the LCCD field from 30 May 2023 to 1 November 2023 (“**Changes**”).

AEMO received eight submissions in response to the Proposal. These submissions generally supported the Proposal.

AEMO’s final determination on the Proposal is to amend the Procedures in the form published with this Final Report, with the effective date of 1 November 2023.

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1. Stakeholder consultation process

As required by NER 7.16.7, AEMO has undertaken the Consultation in accordance with the minor rules consultation procedure under NER 8.9.4.

This Final Report uses terms defined in the NER, which are intended to have the same meanings.

AEMO's process and timeline for this Consultation has been as follows.

Table 1 Consultation process and timeline

Consultation steps	Dates
Minor Amendment Proposal published	28/03/2023
Submissions due on Minor Proposal	14/04/2023
Final Report Published	28/04/2023

AEMO's consultation webpage for the proposal is at [AEMO's website](#), containing all published papers and reports, written submissions, and other consultation documents or reference material (other than material identified as confidential).

A detailed summary of issues raised by Participants in submission, together with AEMO's responses, is contained in **Appendix A**.

2. Background

2.1. Context for this consultation

AGL, Energy Australia and Origin Energy (“**Tranche 1 Retailers**”) requested AEMO to implement the Changes to defer, from 30 May 2023 until 1 November 2023, their obligations to populate the LCCD field. The Changes would align the Tranche 1 Retailers and the Tranche 3 Retailers in terms of 1 November 2023 being the relevant LCCD obligation date for both. As background/context, the Tranche 3 Retailers have a compliance holiday in respect of the LCCD obligations between 30 May 2023 and 1 November 2023.

The Tranche 1 Retailers indicated that:

- The risk exists between 30 May 2023 and 1 November 2023 that the LCCD field is populated but not maintained, therefore may be incorrect (“**LCCD Integrity Risk**”).
- The Changes would mitigate the LCCD Integrity Risk (“**LCCD Risk Mitigation**”).

In particular:

- The Changes would allow more time for energy data holders to standardise their processes where LCCD update/reversal is required (the current design does not cater for an industry-wide approach).
- The Tranche 1 Retailers are developing new processes to cater for a range of scenarios which can occur during a change of account holder, to ensure that the right system transaction flag is triggered. These scenarios include large customer scenarios, for which the CDR IT systems are still being built. In addition, conformance testing with the new flag is not yet possible.
- The Tranche 1 Retailers face additional implications for sales and service scenarios, such as call centres and customer complaints, given that new scripts and questions will need to be produced. The Tranche 1 Retailers expect that some customers will find the types of questions needed for LCCD information to be intrusive, impacting the accuracy of the LCCD information.

AEMO accepted the Proposal by the Tranche 1 Retailers in respect of the Changes, in particular, given the information which the Tranche 1 Retailers have provided on the LCCD Integrity Risk and the LCCD Risk Mitigation.

2.2. The national electricity objective

Within the specific requirements of the NER applicable to this proposal, AEMO has sought to make a determination that is consistent with the national electricity objective (NEO) and, where relevant, to select the option best aligned with the NEO.

The NEO is expressed in section 7 of the National Electricity Law as:

to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to:

- (a) price, quality, safety, reliability and security of supply of electricity; and
- (b) the reliability, safety and security of the national electricity system.

3. Other matters

AGL requested AEMO consider the testing approach and transition plan as part of the LCCD field effective date of 1 November 2023. AEMO will consider this matter as part of industry engagement via the ERCF and Implementation Forum after 30 May 2023.

PlusES identified an inconsistency in table 5.6.5 and 5.7.3 of the Standing Data Access rights of the LCCD field in the MSATS 49.0 Technical Specification – May 2023. AEMO will update table 5.7.3 to align with table 5.6.5. As part of AEMO's consolidation of procedures in Q3 2023, AEMO will update the LCCD text in the CATS procedures to include the participants of LNSP, MDP, MPB and MC in addition to the FRMP.

4. Final determination on proposal

The r43 schema for 30 May 2023 will contain the LCCD. However, updates to MSATS NMI Standing Data will not be accepted until 1 November 2023.

Accordingly, effective from 1 November 2023, the determination is as follows:

- Allow the LCCD field to be populated via CR 5056 and CR 5057
- Stipulate that current retailers will populate the LCCD field in accordance with the Procedures, recognising that stakeholder preferred Option 1: Do not initialise, as the preferred initial population approach.
- Allow the Current FRMP, LNSP, MPB, MDP and RP to receive 'COMPLETED' LCCD Change Request Status Notifications.
- Enable AEMO's 'Move-In' CR 1030/1040 logic to automatically populate the LCCD field once it goes to a Completed Status

For NMI discovery purposes, the LCCD field is displayed but no value is populated against this attribute.

Effective date

The effective date of this determination is **1 November 2023**.

Appendix A. List of Submissions and AEMO Responses

No.	Question	Stakeholder	Participant comments	AEMO response
1	Does your organisation agree with the proposed change to the effective date?	AGL	Yes	AEMO notes the respondent's approval of the proposed change to the CDR effective date.
2	Does your organisation agree with the proposed change to the effective date?	CitiPower Powercor	<p>CitiPower Powercor supports the proposed change to the effective date moving from 1 May to 1 November. However, a risk has been identified in relation to the proposed change due to our project team being disbanded before this date. This poses a risk to CitiPower Powercor as we won't have testing resources available in the latter part of the year to complete the required regression testing.</p> <p>Therefore, CitiPower Powercor strongly recommends AEMO provide some sample CR 5056/5057 as part of the May Pre-Prod environment to help us complete regression testing now as this will reduce any uncertainty and risk the proposed date change raises and avoid the need to incur additional expenses later this year.</p>	<p>AEMO notes the respondent's response regarding regression testing.</p> <p>AEMO is aiming to provide participants with a pre-production environment that aligns with the 30 May 2023 release. AEMO will have a pre-production environment available for testing before 1 November 2023 available for industry.</p>
3	Does your organisation agree with the proposed change to the effective date?	Energy Australia	Yes EnergyAustralia does agree with the change to the effective date of November 1 2023	AEMO notes the respondent's approval of the proposed change to the CDR effective date.
4	Does your organisation agree with the proposed change to the effective date?	Jemena	Deferring the change to 1 November presents a risk to Jemena in that we will no longer have access to planned or budgeted project team for a Q4 industry testing. Jemena had plans to test this change as part of the current bilateral testing cycles with industry participants.	AEMO notes the comment and refers Jemena to response 2 regarding the testing approach prior to 1 November 2023.

No.	Question	Stakeholder	Participant comments	AEMO response
5	Does your organisation agree with the proposed change to the effective date?	Origin Energy	Origin supports the proposed change to the effective date as one of the proponents of the proposal.	AEMO notes the respondent's approval of the proposed change to the CDR effective date.
6	Does your organisation agree with the proposed change to the effective date?	Telstra Energy	<p>Telstra Energy agree with the proposed change to the effective date with the following comments:</p> <p><u>NMI Discovery</u></p> <p>In prior CDR consultation, AEMO indicated the LCCD field would not be made available via NMI Discovery.</p> <p>The 'CDR Minor Amendment Proposal' states (Page 3): "<i>For NMI discovery purposes, the LCCD field will be displayed from 30 May 2023 to 31 October 2023, but no value will be populated against this attribute.</i>"</p> <p>Could AEMO please provide explanation to this NMI Discovery reference including expectation of participants performing NMI Discovery <u>via CATS Browser and/or via API/FTP</u>:</p> <ul style="list-style-type: none"> • Between 30th May 2023 and 31st October 2023 • After 1st November 2023 <p>It is Telstra Energy preference for the LCCD field to be made available via NMI Discovery to support customer onboarding processes.</p> <p><u>CATS Procedure updates</u></p> <p>Telstra Energy continue to recommend CATS Procedure updates (to Section 2.2) to ensure universal and consistent participant update of the LCCD field.</p> <p>Telstra Energy believes that this recommended wording will make it clear about when (and by whom) the LCCD field should be updated. In particular, a participant should expect that AEMO will correctly update the field following processing of a 1030/1040 CATS CR though the obligation to ensure the LCCD field is correct remains with the Current FRMP.</p>	<p>NMI Discovery: The LCCD field name is shown but no value is populated as part of NMI discovery.</p> <p>CATS Procedures updates: AEMO request Telstra Energy put forward this request as an agenda item in the ERCF forum for Industry to consider this proposal.</p>

No.	Question	Stakeholder	Participant comments	AEMO response
			<p>This recommended wording also makes it clear that there is no obligation on the Current FRMP to update an unpopulated LCCD field other than where there has been a change to the account holder starting or ending at a premise.</p> <p>The New FRMP must:</p> <p>(i) Populate or update the Last Consumer Change Date (LCCD) when the date the account holder changes for a premise within 5 business days of:</p> <p>(i) the current FRMP becoming aware that the value in MSATS is not populated or is incorrect or</p> <p>(ii) an End User Transfer Change Request being Completed and the LCCD has changed.</p> <p>The Current FRMP must:</p> <p>(u) Populate or update the Last Consumer Change Date (LCCD) for a premise within 5 business days of:</p> <ul style="list-style-type: none"> I. becoming aware an account holder has started or ended at a premises or; II. becoming aware the value in MSATS is populated and is incorrect or; III. becoming aware LCCD field has not been correctly updated following processing of a 1030/1040 CATS CR 	
7	Does your organisation agree with the proposed	United Energy	United Energy supports the proposed change to the effective date moving from 1 May to 1 November. However, a risk has been identified in relation to the proposed change due to our	AEMO notes the comment and refers to response 2.

No.	Question	Stakeholder	Participant comments	AEMO response
	change to the effective date?		<p>project team being disbanded before this date. This poses a risk to United Energy as we won't have testing resources available in the latter part of the year to complete the required regression testing.</p> <p>Therefore, United Energy strongly recommends AEMO provide some sample CR 5056/5057 as part of the May Pre-Prod environment to help us complete regression testing now as this will reduce any uncertainty and risk the proposed date change raises and avoid the need to incur additional expenses later this year.</p>	
8	Does your organisation have an alternative proposal for implementation?	AGL	No	AEMO notes the respondent's comment.
9	Does your organisation have an alternative proposal for implementation?	CitiPower Powercor	<p>CitiPower Powercor has identified a risk in relation to the proposed change due to our project team being disbanded before this date. This poses a risk to CitiPower Powercor as we won't have testing resources available in the latter part of the year to complete the required regression testing.</p> <p>CitiPower Powercor strongly recommends AEMO provide some sample CR 5056/5057 as part of the May Pre-Prod environment to help us complete regression testing now as this will reduce any uncertainty and risk the proposed date change raises and avoid the need to incur additional expenses later this year.</p>	AEMO notes the comment and refers to response 2.
10	Does your organisation have an alternative proposal for implementation?	Energy Australia	N/A	
11	Does your organisation have an alternative proposal for implementation?	Jemena	Jemena proposes additional testing options that can take place during the May industry testing to reduce any residual risk e.g. activation of 1st Nov functionality for a short period in pre-prod to validate end to end testing and/or populated examples of scenarios.	AEMO notes the comment and refers to response 2.

No.	Question	Stakeholder	Participant comments	AEMO response
12	Does your organisation have an alternative proposal for implementation?	Origin Energy	Origin agrees with the proposed changes as mentioned in the minor amendments.	AEMO notes the respondent's comment.
13	Does your organisation have an alternative proposal for implementation?	Telstra Energy	No comment	
14	Does your organisation have an alternative proposal for implementation?	United Energy	<p>United Energy has identified a risk in relation to the proposed change due to our project team being disbanded before this date. This poses a risk to United Energy as we won't have testing resources available in the latter part of the year to complete the required regression testing.</p> <p>United Energy strongly recommends AEMO provide some sample CR 5056/5057 as part of the May Pre-Prod environment to help us complete regression testing now as this will reduce any uncertainty and risk the proposed date change raises and avoid the need to incur additional expenses later this year.</p>	AEMO notes the comment and refers to response 2.