

Consumer Data Right MSATS Consultation

Final Report and Determination

Published: 8 November 2022

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New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia
Australian Energy Market Operator Ltd ABN 94 072 010 327

Notice of Final Stage Consultation – Consumer Data Right MSATS Consultation

National Electricity Rules – Rule 8.9

Date of Notice:

The publication of this Final Report and Determination Part 2 (Final Report Part 2) concludes AEMO's consultation (Consultation) on the Consumer Data Right (CDR) MSATS-related changes (Changes) to the retail electricity market procedures (Procedures).

The Consultation is being conducted under clause 7.16.7 of the National Electricity Rules (NER), in accordance with the Rules consultation requirements in NER 8.9.

Publication

All submissions will be published on AEMO's website, other than confidential content.

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Contents

Executive Summary	4
1. Stakeholder Consultation Process	5
2. Background	6
2.1. NER requirements	6
2.2. Context for this consultation	6
2.3. Initial Population of Last Consumer Change Date	10
2.4. First stage consultation	10
2.5. Second stage consultation	11
3. Summary of Material Issues	12
4. Discussion of Material Issues	13
4.1. Implementation Date	13
4.2. Application of the Last Consumer Change Date	14
5. Final Determination	15
Appendix A. Glossary	16
Appendix B. Summary of Submissions and AEMO Responses	17

Tables

Table 1 Question on initial population of the Last Consumer Change Date	17
Table 2 MSATS Procedures: CATS Procedure Principles and Obligations	25
Table 3 MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs.....	38
Table 4 Standing Data for MSATS	40
Table 5 General Comments	43

Figures

Figure 1 AGL Figure 1	46
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Executive Summary

AEMO published the Final Report Part 1, Various Minor Matters, on 12 September 2022. This publication maximised the time available to participants to implement the Minor Changes from 7 November 2022.

AEMO's publication of this Final Report Part 2 concludes the Consultation on the MSATS-related Changes to support the CDR. This publication maximised the time available to consider the complex issues regarding the Changes, including in the submissions to AEMO.

AEMO's determination is to add a "Last Consumer Change Date" (LCCD) field to the CATS_NMI_DATA table, with the following requirements (LCCD Requirements):

- The LCCD will be defined as follows:
 - The date a consumer starts or ends as the account holder for a premises.
- A new change request transaction will be created within the National Metering Identifier (NMI) Details group of transactions to allow the current FRMP to maintain this data.
 - As a new stand-alone transaction, this transaction will need to be created only when an update to the LCCD is necessary.
- The LCCD field value/date will be supplied by the current FRMP.
 - Where a prospective FRMP captures this information as part of a customer onboarding process, the update to the LCCD will be provided once the prospective FRMP becomes the current FRMP in MSATS, that is, following the completion of the customer transfer in MSATS.
- AEMO systems will apply logic to the Move-In CR1030/CR1040 transactions to automatically populate the LCCD once it goes to a Completed status. The LCCD will be populated with the Actual Change Date of the completed Change Request.
 - The Actual Change Date of the Change Request's meta data will be the effective date of the completed Change Request.

The addition of the LCCD field will enable the current retailer to request data for periods prior to it becoming the FRMP, thereby eliminating the need for an ADR to otherwise contact multiple retailers/FRMPs to obtain the information required

Further, the majority of respondents and AEMO supports Option 1 'Do not initialise' as the preferred approach for the population of the LCCD. AEMO considers that Option 1 enables a more manageable transition for all Retailers regarding the initial population of the LCCD field.

AEMO has made the Changes to the Procedures as follows:

Summary of Change Proposals Procedure	Type of Change	Proposed Effective Date	Change Proposal
Standing Data for MSATS document vTable 4	Amendment	30 May 2023	Consumer Data Right (CDR)
MSATs Procedures – CATS vTable 4	Amendment	30 May 2023	Consumer Data Right (CDR)
MSATs Procedures – WIGS vTable 4	Amendment	30 May 2023	Consumer Data Right (CDR)

1. Stakeholder Consultation Process

AEMO undertook the Consultation in accordance with NER 8.9, on the following timeline:

Deliverable	Indicative date
Issues Paper published	Wednesday, 27 April 2022
First stage submissions closed	Thursday, 2 June 2022
Draft Report Part 1 published	Friday, 29 July 2022
Submissions due on Draft Report Part 1	Monday, 15 August 2022
Draft Report Part 2 published	Monday, 12 September 2022
Submissions due on Draft Report Part 2	Tuesday, 27 September 2022
Final Report Part 1 published	Monday, 12 September 2022
Final Report Part 2 published	Tuesday, 8 November 2022

A glossary of terms used in this Final Report Part 2 is in Appendix A.

2. Background

2.1. NER requirements

AEMO is responsible for the establishment and maintenance of metering procedures specified in NER Chapter 7, except for procedures established and maintained under NER 7.17.

The procedures authorised by AEMO under NER Chapter 7 must be established and amended by AEMO in accordance with the Rules consultation procedures.

2.2. Context for this consultation

2.2.1. Consumer Data Right

The Australian Government introduced the CDR on 26 November 2017 to:

- Give consumers greater access to and control over their data.
- Improve consumers' ability to compare and switch between products and services.
- Encourage competition between service providers, leading to better prices for customers, as well as more innovative products and services.

The CDR reform is being led by the Federal Treasury (Treasury) and supported by the Australian Competition and Consumer Commission (ACCC).

The CDR has been introduced through amendments to the Competition and Consumer Act 2010 (Cth). The CDR is to be implemented across various sectors of the economy, initially starting with the banking sector in 2020/2021, followed by the energy sector in 2022/2023.

The Final CDR Rules for the energy sector were published on 15 November 2021.

Conceptually, the CDR model is to facilitate the authorised transfer of an authenticated consumer's data from a Data Holder to an Accredited Data Recipient (ADR).

For energy, this data relates to:

- Tariffs, accounts and billing.
- Standing data, metering data and distributed energy resource (DER) data. AEMO is responsible for the provision of this DER data.

Specifically, the energy data available through CDR is as follows:

Data Set	Description	Data Holder	Link to Standards
Generic Tariffs	Energy Plans currently offered to the market, with tariff detail	AER / Victorian Government	DSB - Energy Plan
NMI Standing Data	Site specific data such as location, metering configurations, network tariff and loss factors	AEMO	DSB – Service Points DSB - Service Point Details
Electricity Usage	Metered electricity usage for that site (NMI) for up to 24 months	AEMO	DSB - Energy Usage Reads

Data Set	Description	Data Holder	Link to Standards
Distributed Energy Resources	Installation details for Distributed Energy Resources (DER), such as Solar PV or Batteries, at the site (NMI)	AEMO	DSB - DER
Energy Accounts	Information on the specific plan detail and authorised contacts for accounts	Retailers	DSB- Accounts DSB- Concessions DSB- Payment Schedule
Billing	Invoicing, balances and billing transactions for the account	Retailers	DSB Billing DSB Invoices DSB Balance

The CDR will allow consumers to require energy retailers and AEMO to share the consumer's data with an ADR, such as a comparison site, to enable consumers to obtain more tailored, competitive services. Consumers will need to consent to and authorise their data to be shared.

As designated Data Holders:

- AEMO, as well as the Tranche 1 Retailers - the three largest retailers - must provide the CDR services by 15 November 2022.
- The Tranche 3 Retailers must provide the CDR services by 1 November 2023.

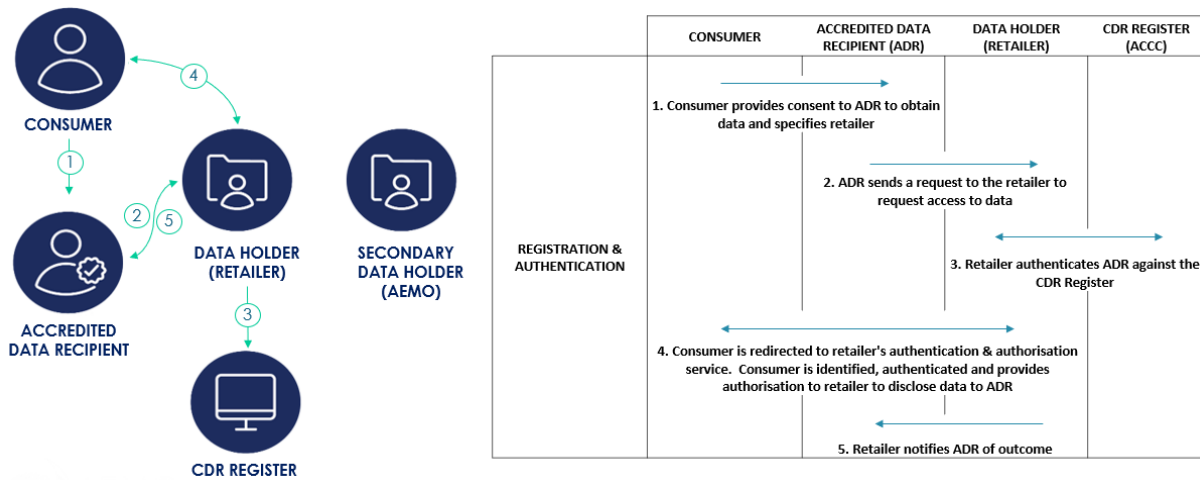
The CDR data sets and transactions are defined in the CDR data standards, under the governance of the Data Standards Body (DSB). The CDR data standards version 1.14, published on 29 October 2021, includes the first full set of candidate level standards for the energy sector.

AEMO, as the Secondary Data Holder, is required to enable consumers to share their information on DER, Standing Data and historical electricity usage that may not be available to the current retailer. Accordingly, the CDR data access model differs from the economy-wide model, to reflect the fact that AEMO does not have the information which is required to manage consumer consent.

In the banking sector, all data required are held by the one party, which is the customer's bank. However, in the energy sector, the data is held across multiple parties.

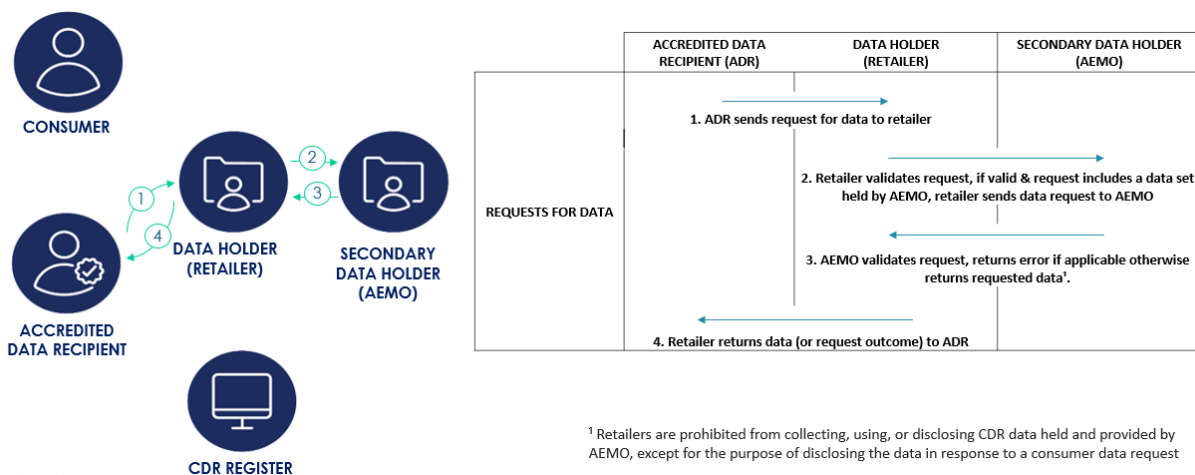
Accordingly, a Peer-to-Peer (P2P) model will be used for the energy sector. The P2P model is a retailer-centric model. In the P2P model, the retailer is at the centre as the Primary Data Holder. The retailer requests data from AEMO, as the Secondary Data Holder, as needed to satisfy data requests. The P2P model eliminates the issue of ADRs needing to request data from multiple parties.

The retailer, as the Primary Data Holder, is responsible for consumer authentication and authorisation. The retailer provides a portal for the consumer to manage/update/retract authorisation. AEMO is not involved in this process.



The retailer, as the Primary Data Holder, must:

- Not use the data which AEMO provides for a purpose other than responding to the relevant data request by the ADR.
- Delete any of this data which it holds in accordance with the CDR data deletion process, once the retailer has responded to the relevant data request by the ADR.



¹ Retailers are prohibited from collecting, using, or disclosing CDR data held and provided by AEMO, except for the purpose of disclosing the data in response to a consumer data request

The data requests will be managed via new APIs defined by the Consumer Data standards, via the existing e-Hub API gateway (<https://consumerdatastandardsaustralia.github.io/standards/#energy-apis>):

- Get Service Points – High level details for a list of NMIs.
- Get Service Point Detail – Details for a specific NMI.
- Get DER for Service Point – Obtain a list of DER data from a particular service point.
- Get DER for Specific Set of Service Points – Obtain DER data for a specific set of service points.

- Get Usage for Service Point – Obtain a list of electricity usage data from a particular service point.
- Get Usage for Specific Set of Service Points – Obtain the electricity usage data for a specific set of service points.

The data for these three services will be sourced from:

- CATS Standing Data.
- DERR – Distributed Energy Resources Register.
- MDM – Meter Data Management.

The key CDR elements for the electricity industry are:

- CDR only allows the current account holder to access the data for the NMI – if there has been a change in account holder, any previous account holders cannot authenticate, so do not have access.
- Current CDR standards still apply – if the retailer knows when there is a move in (i.e. the retailer has been the FRMP throughout), then the retailer can only request/modify the ADR's request, for the period of the current consumer.

2.2.2. CDR MSATS Change

The Treasury has requested AEMO to introduce a new data field in MSATS to indicate when a NMI has changed account holder. This field is intended to 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, it is in accordance with the CDR Rule.

As a result of the feedback received from participants, AEMO's final change proposal is an aseXML change to add a "Last Consumer Change Date" field to the CATS_NMI_DATA table, with the following requirements:

- The Last Consumer Change Date will be defined as follows:
- The date a consumer starts or ends as the account holder for a premises.
- A new change request transaction will be created within the NMI Details group of transactions to allow the current FRMP to maintain this data.
 - As this will be a new stand-alone transaction, it will only need to be created when an update to the LastConsumerChangeDate is necessary.
- The LastConsumerChangeDate field value/date will be supplied by the current FRMP.
 - Where a prospective FRMP captures this information as part of a customer onboarding process, the update to the date is to be provided once the prospective FRMP becomes the current FRMP in MSATS, i.e. following the completion of the customer transfer change request.
- AEMO will apply logic to the 'Move-In' CR1030/CR1040 transactions to automatically populate the LastConsumerChangeDate field once it goes to a Completed status.
 - For the CR's meta data, the actual change date would be the effective date of the completed 'Move-In' CR1030/CR1040.

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, thereby eliminating the need for an ADR to otherwise contact multiple Retailers/FRMPs to obtain the information required.

2.3. Initial Population of Last Consumer Change Date

AEMO sought feedback on the initial population of the Last Consumer Change Date (LCCD).

The proposed options are outlined in the following table:

No.	Description	Net result for consumers	Comments
Option 1	Do not initialise	Consumers can access data for their current retailer relationship (no change). If the consumer changed retailer, then access to historical data would not be available unless the consumer works with retailer to set the LCCD.	Simple implementation. Existing access maintained for early adopters of CDR. However, a future exception flow is left to the next in-coming retailer in the case of an in-situ switching to set the LCCD for consumers using CDR.
Option 2	Set the initial LCCD to a fixed date (30 May 2023)	Consumers receive data from the fixed date. However, a consistent point is set. Within 12 months, all consumers would have a useful set of data. In the interim, consumers using CDR could work with their retailers to set the LCCD.	Simple implementation. However, a poor outcome for early adopters of CDR. Also, retailers need to manage exception flows to set the LCCD.
Option 3	Set the initial LCCD to the start date of the current NMI to FRMP relationship	Consumers can access data for their current retailer relationship (no change). If the consumer changes retailer (in-situ), then access to historical data will be maintained.	Data access maintained for early adopters of CDR. For retailers that are the current FRMP across multiple consumers (Use Case 3: Multiple Consumers - Single Retailer) the LCCD would need to be updated to reflect the current consumer.
Option 4	Set the initial LCCD to the later of: <ul style="list-style-type: none"> Current FRMP Start Date Twelve months prior (30 May 2022) Latest disconnection date Other information 	Consumers can access data for their current retailer relationship (no change). If the consumer changes retailer (in-situ), then access to historical data will be maintained.	Data access maintained for early adopters of CDR. Option 4 extends Option 3 to use other information and a 12-month window to reduce the number of exceptions to be managed by retailers that are the current FRMP across multiple consumers.

2.4. First stage consultation

On 27 April 2022, AEMO issued the Notice of First Stage Consultation and published the Issues Paper, as well as the initial draft amended Procedures. These materials are available on AEMO’s website: <https://aemo.com.au/en/consultations>

The Issues Paper included a summary of the Minor Changes and the Substantive Changes, as well as details on AEMO’s stakeholder engagement, including the Electricity Retail Consultative Forum (ERCF).

In response, AEMO received 15 submissions, held two AEMO facilitated CDR MSATS workshops and the DSB facilitated a workshop. AEMO has published copies of all written submissions (excluding any confidential information) on AEMO's website at:

<https://aemo.com.au/consultations/current-and-closed-consultations/consumer-data-rights-msats-consultation>.

2.5. Second stage consultation

On 12 September 2022, AEMO issued the Notice of Second Stage Consultation, Draft Report Part 2 and draft amended Procedures. This information is available at

<https://aemo.com.au/consultations/current-and-closed-consultations/consumer-data-rights-msats-consultation>. The Draft Report Part 2 included a summary of the Changes, as well as details of AEMO's stakeholder engagement, including through the ERCF.

In response, AEMO received 12 submissions. AEMO has published copies of all written submissions (excluding any confidential information) on AEMO's website at

<https://aemo.com.au/consultations/current-and-closed-consultations/consumer-data-rights-msats-consultation>.

3. Summary of Material Issues

The key material issues arising from the Proposal and raised by Consulted Persons are summarised in the following table:

No.	Issue	Raised by
1	Implementation Date	Multiple Respondents
2	Application of the Last Consumer Change Date	Multiple Respondents

A detailed summary of the issues which were raised by the Consulted Persons in their submissions is included in Appendix B.

4. Discussion of Material Issues

4.1. Implementation Date

4.1.1. Issue summary and submissions

A number of respondents raised concerns in respect to the proposed implementation date of the new LCCD field of 30 May 2023:

- Red Energy and Lumo Energy (Red Lumo) strongly opposed AEMO's proposal to require all retailers, irrespective of their actual obligations and timeframes under the CDR Rule, to populate the LCCD in MSATS from 30 May 2023. Red Lumo noted that the CDR rules/framework do not require Tranche 3 Retailers who are not early adopters to provide any CDR-related data prior to 1 November 2023.
- Alinta Energy suggested that Tranche 3 Retailers should have a compliance holiday until November 2023.
- EnergyAustralia proposed that the implementation date should be moved to May 2024, because Tranche 1 Retailers would be unlikely to start meaningful work on this change until the main CDR implementation is complete on 15 May 2023. EnergyAustralia noted that the 12 months from 15 May 2023 would be required, given the complexity of the changes from a systems and processes perspective.
- Both EnergyAustralia and Red Lumo stated that although the technical solution and schema change may appear to be simple in principle, further work is required to operationalise the changes. Both participants highlighted the very complex backend system changes which are required of retailers, in support of the view that the proposed effective date of 30 May 2023 is unreasonable.

4.1.2. AEMO's assessment

As designated Data Holders:

- AEMO, as well as the Tranche 1 Retailers (the three largest retailers) must provide CDR services by 15 November 2022.
- The Tranche 3 Retailers must provide CDR services by 1 November 2023.

An update to the current schema would be required to allow for the population and receipt of LCCD field values from 30 May 2023, not only for the initial tranche of retailers and AEMO, but also for Tranche 3 retailers.

In light of the DSB's workshop held on 27 July 2022, the DSB recommended that:

1. AEMO should proceed with the proposed MSATS change as it will materially improve CDR data sharing in the energy sector.
2. The DSB and the Data Standards Chair should commit to consulting with energy sector participants on features which may be added to the CDR Data Standards to reduce the cost and improve the customer experience of implementing the MSATS change during the move-in process.

4.1.3. AEMO's conclusion

AEMO has determined that 30 May 2023 will remain as the implementation date of the new LCCD field, as this date provides:

- Tranche 1 Retailers sufficient lead-time to implement the required changes.
- Tranche 3 Retailers a smoother transition to their CDR obligations from 1 November 2023, as AEMO's Move-In functionality would have begun to populate their LCCD field values resulting from Move-In transfers completing in the MSATS.
- Earlier realisation of the benefits of CDR to consumers.

AEMO acknowledges the challenges faced by retailers in ensuring that they are compliant with their CDR obligations. AEMO will continue to work with retailers to ensure the most efficient and effective transition possible.

To demonstrate this commitment, AEMO is offering tranche 3 Retailers a compliance holiday from AEMO's LCCD obligations between 30 May 2023 and 1 November 2023. It is important to note that should a tranche 3 retailer choose to stay on the n-1 schema from 30 May 2023, an MSATS standing data synchronisation process would need to be conducted by the tranche 3 retailer once they upgrade to the 'n' schema .

4.2. Application of the Last Consumer Change Date

4.2.1. Issue summary and submissions

In their submissions, respondents highlighted concerns in respect to the operational application of the LCCD field in terms of when and how the LCCD field should be populated and maintained by retailers:

- Red Lumo noted:
 - 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.
- Energy Australia stated that AEMO should publish 'rules' as to how the LCCD field should be populated and maintained.
- Telstra Energy, Red Lumo and AGL requested AEMO to facilitate a workshop to work through with industry to form a consistent set of industry LCCD update rules and the various scenarios.
- Origin Energy expressed concerns that the LCCD may cause accountability issues resulting in a customer's usage data being shared inappropriately, highlighting the importance of ensuring that all retailers follow a standard approach for populating and maintaining the LCCD field.

4.2.2. AEMO's assessment

The final LCCD definition of “The date a consumer starts or ends as the account holder for a premises.” should provide clearer definition as to when the LCCD should be populated/maintained in MSATS.

Additionally, as noted in the DSB's paper from the 27 July 2022 workshop:

Various concerns regarding vulnerable groups and situations (such as domestic violence) were canvassed and it appears that each of these concerns could be addressed satisfactorily during the move-in/move-out process even with the default option being adopted. This was mainly a recognition that any vulnerable person concerns arising from a move-in/move-out process (which are important to consider) are existing and would not be made worse by the changes being proposed.

4.2.3. AEMO's conclusion

AEMO has updated to the definition of LCCD to provide further clarity and AEMO will continue to work with stakeholders to ensure that a standard application of the LCCD is applied consistently across the NEM.

5. Final Determination

AEMO's final determination is to:

- Add the LCCD field to the CATS_NMI_DATA table with the implementation date of 30 May 2023.
- Have current retailers populate the LCCD field as per AEMO's procedures, recognising stakeholders' preference of Option 1: Do not initialise as the preferred initial population approach.
- Provide tranche 3 retailers a compliance holiday from AEMO's LCCD obligations between 30 May 2023 and 1 November 2023.
- Updated CATS and WIGS procedures to allow for the Current: FRMP, LNSP, MPB, MDP and RP to receive 'COMPLETED' LCCD Change Request Status Notifications.

AEMO has published the Final Procedures which incorporate the Changes.

The change-marked versions are available at: <https://aemo.com.au/consultations/current-and-closed-consultations/consumer-data-rights-msats-consultation>. To request an editable version of the Procedures in .rtf format, please email NEM.Retailprocedureconsultations@aemo.com.au. The pdf version is always the official version.

Appendix A. Glossary

Term or acronym	Meaning
Accredited Data Person/Recipient (ADR)	ADR are the 'receivers' in the Consumer Data Right system. These are the providers who receive a consumer's data after the consumer has given their consent. The providers then use it for the purpose the consumer has requested
CATS	Consumer Administration and Transfer Solution, a part of MSATS.
CDR Consumer	A person or individual who holds relevant authority to share consumer data
Consumer Authentication	Identification of the individual as the rightful CDR consumer – i.e. CDR data owner
Consumer Authorisation	Permission granted by consumers to Data holders to the disclosure of their CDR data to an accredited person
Consumer consent	Permission given from the CDR consumer to the ADR to submit a request on their behalf to retrieve that consumer's data
Consumer Dashboards	An online service that can be used by CDR consumers to manage their consent/authorisations. As per current legislation, each ADR and DH (excluding secondary) are required to provide dashboards
CR	Change Request
Data Holder (DH)	DH are the 'givers' in the Consumer Data Right system. They are the providers who currently hold the consumer data.
DNSP	Distribution Network Service Provider
ERCF	Electricity Retail Consultative Forum
ICF	Issue / Change Form
LNSP	Local Network Service Provider
LR	Local Retailer
MC	Metering Coordinator
MDP	Metering Data Provider
MP	Metering Provider
MPB	Metering Provider Category B
MSATS	Market Settlements and Transfer Solution
NEM	National Electricity Market
NER	The National Electricity Rules made under Part 7 of the National Electricity Law
NERL	National Energy Retail Law
NMI	National Metering Identifier
Secondary Data Holder (SDH)	Data holders (energy retailers specifically) may request data from secondary data holders (SDH) in order to fulfill a data request from an ADR. AEMO is considered a secondary data holder. ADRs cannot directly request data from an SDH.

Appendix B. Summary of Submissions and AEMO Responses

Table 1 Question on initial population of the Last Consumer Change Date

No.	Heading	Participant	Participant Comments	AEMO Responses
1	Which of the proposed initial population options does your organisation prefer and why?	AGL	<p>This response is predicated on the basis that AEMO would be pre-populating the field initially. AGL considers that Option 4 will provide the best benefit for end users, with hopefully the smallest number of updates required across the NEM.</p> <p>However, in supporting this option, AGL notes that no single options seems to be risk free and all may have unintended operational consequences.</p> <p>While AGL supports a pre-population of dates, AGL suggest that this option be workshopped with industry to identify any issues / consequences that are not immediately visible and come to a landing on pre-populating the date field with an initial value.</p>	AEMO notes the respondents comments. Option 1 is the chosen method of initial population.
2	Which of the proposed initial population options does your organisation prefer and why?	Alinta Energy	Alinta Energy does not believe any of the population options fully captures the requirements of the 'last consumer 'actual' change date'.	AEMO notes the respondents comment.
3	Which of the proposed initial population options does your organisation prefer and why?	CitiPower	CitiPower Powercor prefers option 1 as we believe the other options will complicate the process of determining the period of eligibility a customer has to their data.	AEMO notes the respondents support for option 1.
4	Which of the proposed initial population options does your organisation prefer and why?	Energy Queensland	Energy Queensland prefers Option 1, with Option 4 as second preference.	AEMO notes the respondents support for option 1.
5	Which of the proposed initial population options does your organisation prefer and why?	EnergyAustralia	<p>We still have fundamental concerns around the general premise of sharing historical metering data relating to another retailer. It raises risks for both customers and retailers from a privacy, family violence (albeit a low risk), and compliance with regulatory obligations perspective (including the CDR, energy laws, and competition and consumer laws). We have raised these issues with Treasury but note them here for completeness.</p> <p>Regarding initial population, our strong preference is Option 1 (Do not initialise), as this presents the least risk to the consumer of populating the wrong information as the LCCD because the customer will be informing us when they are moving in.</p> <p>The other options arbitrarily pick a date or rely on existing Retailer processes to assume the date (without a</p>	AEMO notes the respondents comments and option preference.

No.	Heading	Participant	Participant Comments	AEMO Responses
			<p>conversation with the customer). It is highly likely that the date will not reflect the date the account holder moved in. This is particularly the case for Option 2 which will pick a fixed date which unless it purely coincides with the move in date, will in the vast majority of cases not reflect the customer move in date.</p> <p>As this LCCD will be unlikely to reflect when the customer actually moved in under Options 2-4, there could be customer confusion where they see that their usage data goes back to a date that does not reflect when they moved in. Where the date is before the customer move in date, this will also cause privacy issues around disclosing the wrong data to the customer (data relating to someone else) or where the date is after, there will be incomplete data set. The customer confusion and privacy issues could result in complaints, incorrect product recommendations by ADRs, and time taken by Retailers to explain what is already a very complex arrangement.</p> <p>Option 3 and 4, to the extent where the initial LCCD is set to the start date of the current FRMP, is also problematic for additional reasons. This will require retailers to retrospectively determine if within the time that they were FRMP there was a change of account holder.</p> <p>Retrospectively determining this will not be workable, given internal change of account holder rules were set up before the LCCD change and may not clearly or reliably identify a change of account holder and move in scenario. i.e. There may not be clear internal system fields or triggers to isolate when an account holder changed and moved in vs did not move in.</p>	
6	Which of the proposed initial population options does your organisation prefer and why?	Jemena	<p>Option 1 – Do not initialise</p> <p>Jemena also believe this is a good and simple way to implement the change, especially if a FRMP has the ability to retrospectively update the LCCD as necessary and as far back as necessary for the consumer to be able to retrieve data they are entitled to. See also section 3, where we've added notes to request an update to the retrospectivity of the new CR.</p> <p>A question – is AEMO assuming that a move-in transfer will have been arranged when a customer moves in, but the FRMP doesn't change? If a transfer hasn't been raised, does AEMO assume the current customer was</p>	<p>AEMO notes the respondents support for option 1.</p> <p>The LCCD field is to be populated and maintained by the current FRMP as per AEMO's CATS obligations.</p>

No.	Heading	Participant	Participant Comments	AEMO Responses
			<p>there from the time the FRMP won the site, in which case it could provide more data than the customer was entitled? This assumes no move-in transfer was raised (or an incorrect 1000/1010 was raised instead), nor a CR raised to update the LCCD.</p>	
7	<p>Which of the proposed initial population options does your organisation prefer and why?</p> <p>Is there an alternative initial population option you believe would better achieve the desired objectives?</p>	Origin	<p>Origin's limited assessment suggests Option 1 as all other options would require a greater amount of rework, with added complexity.</p> <p>Regardless of the data population method, Origin is concerned that this field might cause accountability issues where customer's usage data is shared based on an incorrect date in this field. Hence it is extremely important to ensure all retailers follow a standard approach in populating, and more importantly, updating this field moving forward. There are many questions that require a standard approach so that MSATS data can be used in line with CDR's principles of data integrity, e.g., what should be the correct/true date in this field? Will it be the transfer date? etc.</p>	AEMO notes the respondents comments and support for Option 1.
8	<p>Which of the proposed initial population options does your organisation prefer and why?</p>	Red Lumo	<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. 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>	AEMO notes the respondents comments.

No.	Heading	Participant	Participant Comments	AEMO Responses
			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.	
9	Which of the proposed initial population options does your organisation prefer and why?	TasNetworks	No comment	
10	Which of the proposed initial population options does your organisation prefer and why?	Telstra	Telstra Energy note accurate initial population of the LCCD field, or an appropriate fail safe mechanism, will be required to protect consumer data. If an unpopulated LCCD field is to be treated as if a new account holder has entered the premises as at system date, then Telstra Energy consider this would represent the safest outcome as it would preclude access to prior data which may not relate to current customer. In this case, we support Option 1. If any prepopulation of LCCD field is to take place, Telstra Energy recommend this should be a fixed future date with option for the current FRMP to adjust LCCD date to a date no more than x2 years prior to the fixed date. In this case, we support Option 2.	AEMO notes the respondents comments and refers to Table 1 Item 1 response.
11	Which of the proposed initial population options does your organisation prefer and why?	United Energy	United Energy prefers option 1 as we believe the other options will complicate the process of determining the period of eligibility a customer has to their data.	AEMO notes the respondents support for Option 1.
12	Is there an alternative initial population option you believe would better achieve the desired objectives?	AGL	No	AEMO notes the respondents comment.
13	Is there an alternative initial population option you believe would better achieve the desired objectives?	Alinta Energy	Not specifically. Alinta still believes this information can be captured by certain B2B transactions that AEMO would need to interrogate via the B2B hub.	AEMO notes the respondents comment.
14	Is there an alternative initial population option you believe would better achieve the desired objectives?	Energy Queensland	Energy Queensland offers no alternative.	AEMO notes the respondents comment.
15	Is there an alternative initial population option you believe would better achieve the desired objectives?	EnergyAustralia	No	AEMO notes the respondents comment.
16	Is there an alternative initial population option you believe would better achieve the desired objectives?	PLUS ES	In context to the proposed options PLUS ES is assuming that AEMO is intending to prepopulate the Last Consumer Change Data field, requiring the FRMP to reconcile against their customer database, identify the start date of the customer account and make the amendments as required. We are seeking clarification as there is some ambiguity in the intent. With this approach and the various	AEMO notes the respondent's comments and refer to Table 1 Item 1 response.

No.	Heading	Participant	Participant Comments	AEMO Responses
			steps included, there is an increased risk that a customer may be provided data which they are not entitled to. Alternatively to reduce the risk, The retailer could populate the field for their current customers. This simplifies the activity, better aligns the requirement to customer accounts and achieves the same outcomes without the additional dependencies. Last Consumer Change Date requirements to also consider unknown customers and to mitigate any privacy breaches and drive industry efficiency with a standard approach for all FRMPs.	
17	Is there an alternative initial population option you believe would better achieve the desired objectives?	Red Lumo	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. 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. Red and Lumo would be able to consider this data extraction as a part of the scope and delivery of CDR in November 2023.	AEMO notes the respondents comment.
18	Is there an alternative initial population option you believe would better achieve the desired objectives?	TasNetworks	No comment	
19	Is there an alternative initial population option you believe would better achieve the desired objectives?	Telstra	Telstra Energy do not recognise an alternative option to achieve the desired objectives.	AEMO notes the respondents comments.
20	What do you believe should be considered in implementing your preferred initial population option?	AGL	N/A	
21	What do you believe should be considered in implemented your preferred initial population option?	Alinta Energy	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.	AEMO has provided tranche 3 retailers a compliance holiday from 30 May 2023 to 1 November 2023. This compliance holiday has been provided to allow an appropriate transition to the tranche 3 CDR obligation from 1 November 2023.

No.	Heading	Participant	Participant Comments	AEMO Responses
22	What do you believe should be considered in implemented your preferred initial population option?	CitiPower	<p>CitiPower Powercor recommends that details of the Last Consumer Change Date be provided to distributors as part of any MSATS update. Having the Last Consumer Change Date will allow us to provide data directly to customers that is consistent with how data is provided via a 3rd party.</p> <p>This information is considered very useful to distributors as it will assist in:</p> <ul style="list-style-type: none"> identifying specific periods a consumer has been residing at a premise determining length of time customer is eligible for information, i.e., meter data. This will make it easier for investigations, without needing to look back through multiple records of CDNs to identify when consumer information has changed. managing internal processes relating to how customer information is captured and used 	AEMO agrees that additional industry benefits may be achieved in widening the LCCD Change Request Status Notification Rules. Please refer to the Final CATS and WIGS procedures for updates.
23	What do you believe should be considered in implemented your preferred initial population option?	Energy Queensland	Energy Queensland offers no comment.	AEMO notes the respondents comment.
24	What do you believe should be considered in implemented your preferred initial population option?	EnergyAustralia	See above discussion.	AEMO notes the respondents comment.
25	What do you believe should be considered in implemented your preferred initial population option?	Jemena	Simplicity.	AEMO notes the respondents comment.
26	What do you believe should be considered in implemented your preferred initial population option?	Origin	<p>Origin has two key considerations for AEMO's perusal: While Origin believes that maintenance of this new field can be managed via CR, retailers should be provided access to AEMO's bulk update tool or similar functionality for initial population.</p> <p>The time to implement these changes, considering retailers are yet to agree on a standardised approach to maintain this field, May 2023 implementation amid all other planned changes is highly risky and will jeopardise the quality of data. Origin suggests at least 12 months' timeframe to implement the initial population followed by final report, i.e. the field to be made effective commencing no earlier than November 2023. Origin believes this would be the most effective implementation date as it would align with CDR go-live for all retailers. This would also allow sufficient time for the retailers to agree on a standard approach in populating this new field, as it seems contentious at this stage due to differing</p>	AEMO notes the respondents comment.

No.	Heading	Participant	Participant Comments	AEMO Responses
			interpretations. Unless there's a high CDR uptake, Origin strongly recommends provision of a transition period (for up to 12 months, i.e., until Nov 2024) to complete the data population.	
27	What do you believe should be considered in implemented your preferred initial population option?	Red Lumo	<p>AEMO should consider the impact on second tier retailers who are not early adopters and have no obligation under the CDR rules 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 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>	AEMO notes the respondents comment. The reasoning behind the implementation date of 30 May 2023 has been provided in this Final Report.
28	What do you believe should be considered in implemented your preferred initial population option?	TasNetworks	No comment	
29	What do you believe should be considered in implemented your preferred initial population option?	Telstra	It is critical that the LCCD date accurately reflects actual account holder change otherwise it would run the potential of making the LCCD field meaningless and unable to be used for CDR purposes.	AEMO notes the respondents comments.
30	What do you believe should be considered in implemented your preferred initial population option?	United Energy	<p>United Energy recommends that details of the Last Consumer Change Date be provided to distributors as part of any MSATS update. Having the Last Consumer Change Date will allow us to provide data directly to customers that is consistent with how data is provided via a 3rd party.</p> <p>This information is considered very useful to distributors as it will assist in:</p>	AEMO notes the respondents comment and refers to Table 1 item 22 response.

No.	Heading	Participant	Participant Comments	AEMO Responses
			<p>identifying specific periods a consumer has been residing at a premise determining length of time customer is eligible for information, i.e., meter data. This will make it easier for investigations, without needing to look back through multiple records of CDNs to identify when consumer information has changed. managing internal processes relating to how customer information is captured and used</p>	
31	Other comments	EnergyAustralia	<p>Override rules</p> <p>AEMO should provide rules on what should override the LCCD where there are two responses that might be inconsistent. For example: An earlier and subsequent FRMP, where the LCCD of the subsequent FRMP might pre-date and retrospectively change the first FRMP's date. AEMO's automatic LCCD change for CR 1030 and 1040, and a subsequent CR 5057 (retrospective) being raised by the FRMP.</p> <p>Implementation timeframe</p> <p>AEMO states that 30 May 2023 is the proposed effective date. We take this as meaning Retailers will need to make process and system changes to be able to raise the new CR 5056 and 5057 from this date. If so, we strongly advise that a 30 May 2022 compliance date for the schema change is not achievable in view of the substantial discovery and solution work that Retailers will have to undertake in their backend.</p> <p>We strongly advise the implementation date should be moved to May 2024 given Tier 1 Retailers will be unlikely to start meaningful work on this change until the main CDR implementation is complete on 15 May 2023.</p> <p>12 months from 15 May is required give the complexity from a system and process perspective, the number of systems involved and because our CDR team's capacity is full implementing the main CDR solution and cannot absorb further change.</p> <p><i>Complexity of system changes</i></p>	<p>AEMO notes the respondents comments and notes the definition of the Last Consumer Change Date has been changed as a result of feedback from respondents.</p> <p>A workshop facilitated by the DSB was held on 27 July to work through solutions with industry on how to determine if the customer being onboarded is the current owner of the NMI.</p> <p>AEMO considers that the proposed effective date provides the industry with sufficient lead-time to implement its required changes, while also supporting the realisation of the benefits for consumers. A compliance holiday for tranche 3 retailers, from AEMO's LCCD obligations, has been provided until 1 November 2023</p>

No.	Heading	Participant	Participant Comments	AEMO Responses
			<p>At first glance, the schema change is simple. However, the backend system changes for Retailers are highly complex. The LCCD transaction needs to be triggered by an internal system transaction to automate the solution as much as possible, and even then, a manual work around still needs to exist for when customers call and wish to correct their LCCD.</p> <p>This means Retailers will need to identify an appropriate system transaction or field which will trigger the LCCD update. System transactions around change of account holder were set up well before this LCCD proposal, and so it might not be clear cut to determine which system transaction or field denotes a change of account holder <i>and</i> move in. There are already multiple scenarios around change of account holder which can also be set up differently in our systems which further complicates identifying the right system transaction or field.</p>	

Table 2 MSATS Procedures: CATS Procedure Principles and Obligations

No.	Section	Description	Consulted Person	Participant comment	AEMO response
1	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>	AGL	Noted. This should minimise the number of additional transactions required.	AEMO notes the respondents comments.
2	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>	Alinta Energy	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?	AEMO will apply ongoing logic to the move-in CR1030/CR1040 transactions. Any other updates to the LCCD would need to be initiated by the current FRMP via the CR5056/5057 transactions.

No.	Section	Description	Consulted Person	Participant comment	AEMO response
3	2.10 AEMO	Addition of: (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.	Energy Queensland	Energy Queensland offers no comment	
4	2.10 AEMO	Addition of: (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.	EnergyAustralia	No comment.	
5	2.10 AEMO	Addition of: (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.	Jemena	<u>Section 2.2 FRMP Obligations</u> – Jemena believe an obligation on provision of the Last Consumer Change Date (LCCD) by the new/current FRMP should be added to this section, according to CDR obligations. This will provide the assurance required for ongoing data integrity in the CR transactions. <u>Section 2.10</u> – question for AEMO is how they are going to handle the situation where a transfer reversal has taken place after completion of a 1030/1040 transfer?	AEMO notes the respondents comment and notes this has been change-marked. The current Retailer is to maintain the accuracy of the LCCD value, regardless of the scenario.
6	2.10 AEMO	Addition of: (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.	Origin	Origin believes that the completion of the 1030/1040 will auto populate values in the LastConsumerChangeDate (LCCD) field (assumably a tenant, rather than an owner-occupier, is going to be the most likely to have this field populated, via CR1030/1040). Origin also notes that for a 1040 currently, it is restricted to 10-day retrospectivity.	AEMO notes the respondents comment. A CR 5056/5057 is to be utilised to update the LCCD where required.
7	2.10 AEMO	Addition of: (p) Populate the Last Consumer Change Date upon completion of Change Requests 1030 and 1040. The Last Consumer Change Date will be populated	Red Lumo	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	AEMO notes the respondents comment and refers to Table 2 Item 5.

No.	Section	Description	Consulted Person	Participant comment	AEMO response
		<i>with the Actual Change Date of the Change Request.</i>		into the MSATS Procedures as proposed in our 'General Position' section of this paper.	
8	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>	TasNetworks	Accepted.	AEMO notes the respondents comment.
9	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>	Telstra	<ol style="list-style-type: none"> Telstra Energy request AEMO confirm the following Telstra Energy consultation assumptions: <ul style="list-style-type: none"> AEMO are proposing to automatically update the LCCD upon 1030/1040 CR COM as these CATS CR's directly relate to a Customer Move In (i.e. a change of account holder) scenario The LCCD field need not be updated where 1000/1010 CATS CR's are utilised by prospective FRMP as these CATS CRs that do not relate to a Customer Move In (i.e. No change of account holder) scenario The proposed new 5056/5057 CATS CR's should only be raised by a current FRMP where there is a change in a consumer's relationship to an existing account of which only the current FRMP would be aware of. <ul style="list-style-type: none"> Note: Refer also to Telstra Energy consultation queries regarding changes to a Consumer Account Telstra Energy request confirmation AEMO's proposed management of LCCD in a CATS error correction scenario. Following COM of CATS CR's 1020, 1023, 1025, 1029, 1060 and 1061, will AEMO/CATS revert the LCCD value back to previously held value? 	AEMO confirms: <ul style="list-style-type: none"> AEMO will apply logic to the CR1030/CR1040 transactions to automatically populate the LastConsumerChangeDate field with the effective date contained in the CR once it goes to a Completed status. The LCCD must be updated where a consumer starts or ends as the account holder for a premises CR 5056/5057 is to be applied where a consumer starts or ends as the account holder for a premises during the period with the current retailer AEMO refers to Table 2 Item 5 response.

No.	Section	Description	Consulted Person	Participant comment	AEMO response
				Note: This may require AEMO/CATS reversal of an LCCD update made by the 'temporary'/incorrect current FRMP.	
10	12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	AGL	Noted. However, as there may be new NMI classifications developed, some consideration may be warranted as to whether to include NMIs which may change, or like the WIGS procedure, list NMIs which are excluded.	AEMO notes the respondents comments. Should new NMI classifications be developed in the future, any required changes will be consulted on at the time the changes occur.
11	12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	Alinta Energy	Understood. Potential new NMI classifications should be considered here.	AEMO notes the respondents comment and refers to Table 2 Item 10 response.
12	12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	Energy Queensland	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. 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.	AEMO notes the respondents comment. Although the CR 5056/5056 has a retrospective period of 1 day, the Last Consumer Change Date contained within the CR does not. The 'Last Consumer Change Date' is the relevant date communicating the consumer change. No date restrictions will apply to the value provided in the LCCD field and the only validation will be on the date format.
13	12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	EnergyAustralia	Update Table 12L to include Notification being sent to LNSP.	AEMO notes the respondents comment and refers to Table 1 Item 5 response.
14	12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	EnergyAustralia	No comment.	

No.	Section	Description	Consulted Person	Participant comment	AEMO response
15	12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	Jemena	<ul style="list-style-type: none"> <p>Table 12-K – Timeframe Rules: Jemena believe the retrospective period should be set as far back as possible, to ensure a customer is able to receive data they are entitled to and in the timeframe they are entitled, which is what CDR is all about. While the new CR can be raised on the completion of a move-in (regardless of whether a transfer is raised or not), it should also be used to update the LCCD to correct the date so that it shows when a customer really was responsible from – otherwise, how is AEMO going to provide a customer data they are entitled to when the date is not set or is incorrect – e.g. meter data for the last 5 months, when the CR only allows the current or future date to be provided, but the customer has been there many years?.</p> <ul style="list-style-type: none"> Questions: <ul style="list-style-type: none"> Can a CR be created to go back in time to as long as necessary for the customer to have an accurate LCCD (i.e. not just the 140 business days)? Can a current FRMP set the LCCD back in time prior to when it was not FRMP – else how can the consumer have an accurate LCCD? <p>Table 12-L – Change Request Status Notification Rules: Jemena would like AEMO to broaden the scope to include LNSP role participants also receiving the COM notification for the new 5056/7 CR “Change NMI – Last Consumer Change Date” (LCCD). This will allow the following benefits to meet obligations in our roles as LNSP/MDP:</p> <ul style="list-style-type: none"> Providing the Jemena business a key date to help ensure consumers receive data they are entitled to, noting LNSPs and MDPs currently 	<p>AEMO notes the respondents comments and refer to Table 2 Item 12 response and Table 1 Item 22 response.</p> <p>Section 12, Table 3 has been amended and shown as a marked change.</p>



No.	Section	Description	Consulted Person	Participant comment	AEMO response
				<p>have similar obligations to AEMO to provide meter and standing data direct to consumers (via MDPP)</p> <ul style="list-style-type: none"> ○ Assists in identifying specific period/s a consumer has been residing at a premise, which: <ul style="list-style-type: none"> ▪ Assists with requests to determine what information to provide direct to consumers for what date periods ▪ E.g. customer moved in 2 months ago, but is asking for 2 years of meter data ▪ E.g. A customer request on a list of service orders, we know how far back we can go with the information ○ Gives greater confidence to other consumer data date records, received as CDN or CATS notifications, noting the correct move-in transfer type isn't always raised, nor is a CDN always sent (with or without the correct reason) ○ Helps us remain in synch with the industry, especially given we have similar obligations to provide the same data direct to consumers. If not, how can the industry answer the question about differing allowances of data provision to the same consumer (especially meter data) when AEMO or the LNSP/MDP is sent the same request for meter or standing data, but our LCCDs differ? <p>12. Table 3 Initiating Roles - update the section reference to be "12. Table 4" (incorrectly set to 12.4.4)</p>	

No.	Section	Description	Consulted Person	Participant comment	AEMO response
16	12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	Origin	<p>“Table 4-A –Change Reason Codes” needs to be updated with the new CR codes as per section 12.5</p> <p>Clause 12.Table 3 should be corrected to refer to clause 12.Table 4 (it currently refers to 12.4.4)</p> <p>Regarding “Timeframe Rules” in section 12.Table 5, can AEMO please confirm whether there will be any validation in MSATS to prevent the current FRMP from updating this field for the period it is/was not the FRMP?</p> <p>Also, if a retailer acquires a site erroneously, what would be the behaviour (or expected behaviour) of this field if the date is flagged by the FRMP that subsequently returned the site to previous FRMP? Scenarios where there's an obvious mismatch must be addressed either in the MSATS Procedures, or technical validation (acknowledging, that could be quite complex).</p>	<p>AEMO notes the respondents comments. Table 4-A and Clause 12, Table 3 have been amended and show as a marked change.</p> <p>AEMO refers to Table 2 Item 12 response.</p> <p>AEMO refers to Table 2 Item 5 response.</p>
17	12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	PLUS ES	<p>Incorrect reference in section 12.Table 3.</p> <p>12.5.3.Initiating Roles A Current FRMP may initiate a Change Request to change a NMI record in MSATS in accordance with section 12.4.4.</p> <p>Amend to section 12.Table 4.</p>	AEMO notes the respondents comment and refers to Table 2 Item 15.
18	12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	Red Lumo	<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> <p>Scenario 1: 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. On 1 Jan 2025 a new customer calls up for a move in from 10 Jan 2025. FRMP arranges the move-in</p>	AEMO notes the respondents comment and refers to Table 2 Item 5 response.

No.	Section	Description	Consulted Person	Participant comment	AEMO response
				<p>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>Scenario Questions:</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. Table 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> <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>Scenario 2:</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>	

No.	Section	Description	Consulted Person	Participant comment	AEMO response
				<p>Scenario Questions:</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>	
19	12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	TasNetworks	Accepted.	AEMO notes the respondents comment.
20	12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	Telstra	<p>1. Telstra Energy request AEMO confirm the following Telstra Energy consultation assumptions:</p> <ul style="list-style-type: none"> The proposed CATS 5056/5057 CR's can provide current FRMP ability to correct LCCD errors impacting a consumers access to their CDR data There will be no current FRMP concerns (compliance or otherwise) for LCCD error corrections crossing a CATS FRMP boundary Content of the LCCD field value will not be validated nor limited by the CATS system A Current FRMP should not populate LCCD field with a date more than x2 years prior to current date to match CDR rules <p>2. As stated in 1st round consultation, Telstra Energy note this consultation does not provide for a current FRMP SLA to update the LCCD. Telstra Energy request AEMO clarify:</p> <ul style="list-style-type: none"> What is the current FRMP SLA to update LCCD? E.g. Within x5 days of becoming aware of an LCCD trigger update (as per Customer Classification Code change) 	<p>AEMO confirms the respondents assumptions raised in 1.</p> <p>AEMO notes the respondents comment and confirms that further FRMP obligations have been added to the Final CATS Procedures.</p> <p>AEMO notes the respondents comment and refers to Table 1 item 31 response.</p>

No.	Section	Description	Consulted Person	Participant comment	AEMO response
				<ul style="list-style-type: none"> Where will the current FRMP SLA will be specified? E.g. Section 2.2 of CATS Procedures as per other current FRMP SLA's. <p>3. As stated by Telstra Energy in 1st round consultation, determination of where/when a consumer's relationship to an account has changed should be made clear to ensure industry alignment and protect CDR reform outcomes and avoid domestic violence ramifications.</p> <p>During this consultation, Telstra Energy request AEMO schedule an industry workshop to form a consistent set of industry LCCD update rules/scenarios</p>	
21	12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	United Energy	Update Table 12L to include Notification being sent to LNSP.	AEMO notes the respondents comment and refers to Table 1 Item 22 response.
22	Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of 'Last Consumer Change Date'	AGL	<p>Noted.</p> <p>AGL notes that the Last Consumer Change Date is not visible in NMI discovery but believes that this would be relevant information to other participants (eg MCs seeking to replace meters where a customer objection has been lodged) and supports it being visible in NMI discovery.</p>	AEMO agrees that additional industry benefits may be achieved in widening the LCCD Change Request Status Notification Rules. Please refer to the Final CATS and WIGS procedures for applicable updates.
23	Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of 'Last Consumer Change Date'	Alinta Energy	Understood.	AEMO notes the respondents comment.
24	Table 16-C – NMI	Addition of 'Last Consumer Change Date'	Energy Queensland	Energy Queensland offers no comment.	

No.	Section	Description	Consulted Person	Participant comment	AEMO response
	Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules				
25	Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of 'Last Consumer Change Date'	EnergyAustralia	Update Last Consumer Change Date field with a 'Yes' against LNSP.	AEMO notes the respondents comment and refers to Table 1 Item 22 response.
26	Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of 'Last Consumer Change Date'	EnergyAustralia	No comment.	
27	Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of 'Last Consumer Change Date'	Jemena	For the reasoning from comments on the new CR in 1Table 5 above, Jemena requests an update to table 16-C to allow the LNSP to have access to the Last Consumer Change Date via the standing data access rights.	AEMO notes the respondents comment and refers to Table 1 Item 22 response.
28	Table 16-C – NMI	Addition of 'Last Consumer Change Date'	Origin	No comments	

No.	Section	Description	Consulted Person	Participant comment	AEMO response
	Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules				
29	Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of 'Last Consumer Change Date'	PLUS ES	Aligning with PLUS ES' commentary (provided in the General section), with respect to participants accessing Last Consumer Change Date, we further propose that Standing Data Access Rights are extended to participant roles beyond the current FRMP and NMI Discovery is enabled accordingly.	AEMO notes the respondents comment and refers to Table 1 Item 22 response.
30	Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of 'Last Consumer Change Date'	Red Lumo	Noted.	
31	Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of 'Last Consumer Change Date'	TasNetworks	Accepted.	AEMO notes the respondents comment.
32	Table 16-C – NMI Standing Data Items	Addition of 'Last Consumer Change Date'	Telstra	Telstra Energy have no comment relating to the proposed change.	

No.	Section	Description	Consulted Person	Participant comment	AEMO response
	and CATS Standing Data NMI Discovery Data Access Rules				
33	Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of 'Last Consumer Change Date'	United Energy	Update Last Consumer Change Date field with a 'Yes' against LNSP.	AEMO notes the respondents comment and refers to Table 1 Item 22 response.
34	2.2 FRMP	Obligation to populate or maintain Last Change Date.	AGL	<p>AGL notes that while 2.10 has been amended to ensure AEMOs obligations, there has been no similar obligation placed within S 2.2 to ensure that the FRMP maintains and updates the last change date as necessary.</p> <p>Clause 2.1j would not apply , as the notice of error is most likely to come from a consumer, not another participant, and there is no clause within 2.2 which would require the current FRMP from maintaining the Last Change Date.</p> <p>Noting the privacy issues surrounding this information, AGL does believe that this should be clearly stated, in much the same way that 2.2q calls out obligations regarding the Customer Classification.</p>	AEMO notes the respondents comment and refers to Table 2 Item 5.
35	2.2		PLUS ES	<p>For increased data integrity, PLUS ES proposes that an obligation is added for the current FRMP to populate the Last Consumer Change Date field upon a change of customer account holder at an NMI – where a CR1030/40 was not raised.</p> <p>The intent of the obligation would align with similar clauses of this section and with the proposed AEMO obligation of section 2.10 (p).</p>	AEMO notes the respondents comment and refers to Table 2 Item 5.

No.	Section	Description	Consulted Person	Participant comment	AEMO response
36		Change request Status Notification Rules – Table 12L	PLUS ES	<p>Supporting PLUS ES' commentary (provided in the General section), with respect to participants accessing Last Consumer Change Date, we further propose notifications to be extended to participants associated with the NMI – following the COMPLETED status.</p> <p>The proposal for extending notifications would also apply to AEMO updates following the completion of CR1030/40.</p> <p>This would deliver operational efficiencies.</p>	AEMO agrees that additional industry benefits may be achieved in widening the LCCD Change Request Status Notification Rules. For example, prompting MCs to contact the FRMPs to organise metering works. Please refer to the Final CATS and WIGS procedures for applicable updates.

Table 3 MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

No.	Question	Participant Comment	Consulted Person	Participant comment	AEMO Response
1	7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	AGL	Noted	AEMO notes the respondents comment.
2	7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	Alinta Energy	Understood.	AEMO notes the respondents comment.
3	7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	Energy Queensland	As noted above in relation to CATS 12.5, Energy Queensland suggests the need for consistency with other timeframes for retrospective change.	AEMO notes the respondents comment and refers to Table 2 Item 12.
4	7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	EnergyAustralia	No comment.	
5	7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	Jemena	N/A – not relevant to Jemena in our responsible roles	AEMO notes the respondents comment.
6	7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	Origin Energy	Section 7.3.3, 7.3.5 and 7.3.7 has an error message, errata to be fixed with correct reference.	AEMO notes the respondents comment, this has been shown as a marked-change.
7	7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	PLUS ES	<p>Incorrect reference in section 7.3.3</p> <p>7.3.3. Initiating Roles</p> <p>A Current FRMP may initiate a Change Request to change a NMI record in MSATS in accordance with section Error! Reference source not found.</p>	AEMO notes the respondents comment and refers to Table 3 Item 6 response.

No.	Question	Participant Comment	Consulted Person	Participant comment	AEMO Response																																													
				Amend to section 7.3.4.																																														
8	7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	Red Lumo	Noted	AEMO notes the respondents comment.																																													
9	7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	TasNetworks	Accepted.	AEMO notes the respondents comment.																																													
10	7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	Telstra	Telstra Energy have no comment relating to the proposed change.																																														
11	7.3.2(b)		AGL	As there are new NMI classifications being considered, it may be prudent to identify the NMI classifications which do not have customers as being excluded, rather than those with customers which are included. Eg The NMI classification is not INTERCON, BULK, XBOUNDARY.....	AEMO notes the respondents comment and refers to Table 2 Item 10 response.																																													
12		7.3.5	PLUS ES	Incorrect reference in section 7.3.3 7.3.5 Timeframe Rules 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 Error! Reference source not found.	AEMO notes the respondents comment and refers to Table 3 Item 6 response.																																													
13		7.3.7	PLUS ES	Incorrect reference in section 7.3.3 7.3.7 Change Request Status Notification Rules The Change Request Status Notification Rules are specified in Error! Reference source not found.																																														
14		7.3.7	PLUS ES	Supporting PLUS ES' commentary (provided in the General section), with respect to participants accessing Last Consumer Change Date, we further propose notifications to be extended to participants associated with the NMI – following the COMPLETED status. i.e. undo the deletion of the Table 7-H <table border="1"> <thead> <tr> <th>Status/Choice</th> <th>FRMP</th> <th>ENLR</th> <th>LNSP</th> <th>NDP</th> <th>NCP</th> <th>ScuR</th> <th>SC</th> <th>DNRP</th> </tr> </thead> <tbody> <tr> <td></td> <td>N</td> <td>C</td> <td>N</td> <td>C</td> <td>N</td> <td>C</td> <td>N</td> <td>C</td> </tr> <tr> <td>CANCELLED</td> <td>: Yes</td> <td>: :</td> <td>: :</td> <td>: :</td> <td>: :</td> <td>: :</td> <td>: :</td> <td>: :</td> </tr> <tr> <td>COMPLETED</td> <td>: Yes</td> <td>: Yes</td> <td>: Yes</td> <td>: Yes</td> <td>: Yes</td> <td>: Yes</td> <td>: Yes</td> <td>: Yes</td> </tr> <tr> <td>OBJECTED</td> <td>: :</td> <td>: :</td> <td>: :</td> <td>: :</td> <td>: :</td> <td>: :</td> <td>: :</td> <td>: :</td> </tr> </tbody> </table>	Status/Choice	FRMP	ENLR	LNSP	NDP	NCP	ScuR	SC	DNRP		N	C	N	C	N	C	N	C	CANCELLED	: Yes	: :	: :	: :	: :	: :	: :	: :	COMPLETED	: Yes	: Yes	: Yes	: Yes	: Yes	: Yes	: Yes	: Yes	OBJECTED	: :	: :	: :	: :	: :	: :	: :	: :	AEMO notes the respondents comment and refers to Table 1 Item 22 response.
Status/Choice	FRMP	ENLR	LNSP	NDP	NCP	ScuR	SC	DNRP																																										
	N	C	N	C	N	C	N	C																																										
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OBJECTED	: :	: :	: :	: :	: :	: :	: :	: :																																										

No.	Question	Participant Comment	Consulted Person	Participant comment	AEMO Response
				<p>The proposal for extending notifications would also apply to AEMO updates following the completion of CR1030/40.</p> <p>This would enable participants to implement efficient operational processes.</p>	

Table 4 Standing Data for MSATS

No.	Section	Description	Consulted person	Participant comment	AEMO response
1	7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions	Addition of 'Last Consumer Change Date'	AGL	AGL notes this change but considers that as AEMO will populate the data from 1030 and 1040 CRs, then this needs to be shown as both Current FRMP and AEMO, otherwise the implication is that the current FRMP must submit a CR even when the 1030/1040 will suffice.	AEMO notes the respondents comment. The current FRMP will be the responsible party to provide the Last Consumer Change Date value. AEMO systems will apply logic to the CR1030/CR1040 transactions to automatically populate the LastConsumerChangeDate once it goes to a Completed status. The Last Consumer Change Date will be populated with the Actual Change Date of the Change Request.
2	7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions	Addition of 'Last Consumer Change Date'	Alinta Energy	Alinta believes there needs to be clarity on when AEMO will/has populated versus when the FRMP will/has populated.	AEMO notes the respondents comment and refers to Table 4 Item 1 response.
3	7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions	Addition of 'Last Consumer Change Date'	Energy Australia	No comment.	
4	7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions	Addition of 'Last Consumer Change Date'	Energy Queensland	Energy Queensland offers no comment.	
5	7.1 Field Definitions Table 12	Addition of 'Last Consumer Change Date'	Jemena	A note to suggest that the definition cannot be finalised until the scope of the initial population of the LCCD has been confirmed. For instance, if option 1, this field will actually be blank, which	AEMO notes the respondents comment.

No.	Section	Description	Consulted person	Participant comment	AEMO response
	CATS_NMI_DATA – Field Definitions			means the O/M/R should also be reset to “Optional”. If other choices are made, then the definition will need to be modified to suit the chosen option, with some understanding on how to populate it.	
6	7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions	Addition of ‘Last Consumer Change Date’	Origin	In this table, the ‘party to provide’ is marked as ‘Current FRMP’ however AEMO is also updating this field using CR1030/1040. It would be worth adding clarification that while the current FRMP will be responsible for data-accuracy of this field, ‘Party to Provide’ could be either AEMO or FRMP.	AEMO notes the respondents comment and refers to Table 4 Item 1 response.
7	7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions	Addition of ‘Last Consumer Change Date’	PLUS ES	If it is determined that an initial population of the field will not be required and to support data integrity, PLUS ES proposes that the obligation to provide the Last Consumer Change Date should be amended from Mandatory to Required. The definition of Required, combined with the PLUS ES proposed FRMP obligation/s (CATS section 2.2) would effectively deliver a mandate to populate the field. The Required status is described as this data must be provided if this information is available.	AEMO notes the respondents comment and will consider their suggestion.
8	7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions	Addition of ‘Last Consumer Change Date’	Red Lumo	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. 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.	AEMO notes the respondents comment and refers to Table 4 Item 1 response.
9	7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions	Addition of ‘Last Consumer Change Date’	TasNetworks	Accepted.	AEMO notes the respondents comment.
10	7.1 Field Definitions Table 12	Addition of ‘Last Consumer Change Date’	Telstra	Telstra Energy request this definition be discussed in requested workshop. Clarification of changes and additions to current account holders within the same household is required to ensure industry	AEMO notes the respondents comment and refers to Table 1 item 31 response.

No.	Section	Description	Consulted person	Participant comment	AEMO response
	CATS_NMI_DATA – Field Definitions			alignment and protect CDR reform outcomes and avoid domestic violence ramifications.	
11	7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	AGL	AGL supports this information being made available on the NMI Discovery Standing Data pages / files.	AEMO notes the respondents comment and refers to Table 2 item 22 response.
12	7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	Alinta Energy	Understood.	AEMO notes the respondents comment.
13	7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	Energy Australia	No comment.	
14	7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	Energy Queensland	Energy Queensland offers no comment.	
15	7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	Jemena	Add AEMO to the "Party to Provide" field, as AEMO update the field on completion of a 1030/1040 CR Update the aseXML Path to remove the space between Change and Date ElectricityStandingData/MasterData/LastConsumerChange Date	AEMO notes the respondents comment and refers to Table 4 Item 1 response. The aseXML path has been change-marked.
16	7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	Origin	No comments	
17	7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	PLUS ES	Typo – LastConsumerChangeDate ElectricityStandingData/MasterData/LastConsumerChangeDate Amend to dd-mm-yyyy.	AEMO notes the respondents comment and refers to Table 4 item 15 response.
18	7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	Red Lumo	Noted.	AEMO notes the respondents comment.
19	7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	TasNetworks	Accepted.	AEMO notes the respondents comment.
20	7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	Telstra	Telstra Energy have no comment relating to the proposed change.	
21	7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	AGL	Noted	AEMO notes the respondents comment.
22	7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	Alinta Energy	Understood.	AEMO notes the respondents comment.
23	7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	Energy Australia	No comment.	
24	7.3 Table 14 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	Energy Queensland	Energy Queensland offers no comment.	

No.	Section	Description	Consulted person	Participant comment	AEMO response
	Field value examples				
25	7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	Origin	No comments	
26	7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	Red Lumo	Noted.	AEMO notes the respondents comment.
27	7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	TasNetworks	Accepted.	AEMO notes the respondents comment.
28	7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	Telstra	Telstra Energy have no comment relating to the proposed change.	
29	May 2023 Obligation	'Last Consumer Change Date'	Alinta Energy	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.	AEMO notes the respondents comment and refers to Table 1 item 31 response.

Table 5 General Comments

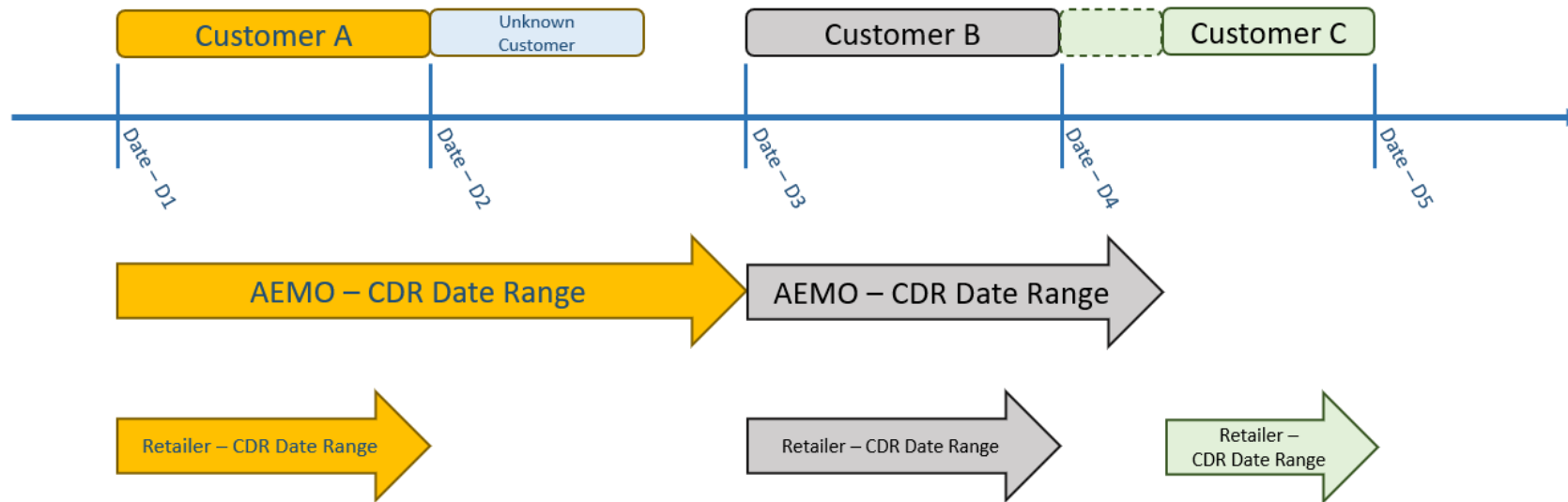
No.	Topic	Participant	Participant Comment	
1	Schema update – CI 4.2.3 - page 17	AGL	<p>AGL notes the comment regarding allowing participants to remain on the n-1 Schema.</p> <p>AGL understands this comment to refer to non-CDR participants but expects all retailers to upgrade their schema to implement this change required for the provision of CDR data, regardless of whether that retailer has a CDR obligation or not.</p>	AEMO notes the respondents comment. Given the compliance holiday provided by AEMO to tranche 3 retailers, each organisation will need to determine its preferred implementation approach, ensuring their compliance with the applicable Rules and procedures.
2	Operational Processes to manage Last Consumer Date.	AGL	<p>AGL understands that AEMO expects the Last Change Date to only be populated when a customer account is newly established. However, there can be periods when there is an unknown customer who is consuming energy between contracted customers.</p> <p>To ensure privacy, the last change date should also be set when accounts are closed and customers advise they are moving out.</p>	AEMO notes the respondents comment and refers to Table 1 Item 31 response.

No.	Topic	Participant	Participant Comment	
			<p>See figure 1 below for a graphical example.</p> <p>As such, while AGL considers the technical solution may not require further development, AGL strongly suggests 1-2 workshops be held during October to tease out the operational issues prior to all procedures and participant processes being completed.</p>	
3	CI 4.3.2 Extend MDPP Procedures	AGL	<p>AGL notes that CL 4.3.2 discusses the extension of the MDPP procedures to include standing following NEL/NER amendments but has not seen any proposed re-drafting of the MDPP {Procedures to understand what changes are to be made and what impacts there may be on participants.</p>	<p>AEMO notes the respondents comment. AEMO understanding is the intent of the Commonwealths NEL/NER changes to MDPP was to align with the standing data content available via CDR to facilitate a consistent outcome. In terms of timing we believe the rules drafting tasks AEMO to set the implementation time as part of the consultation on the MDPP changes with stakeholders. At this stage AEMO intends to prioritise the CDR rollout to large and smaller retailers (Nov 2023) ahead of progressing subsequent changes to MDPP.</p>
4	Access to the Last Consumer Change Date information	PLUS ES	<p>PLUS ES does not support AEMO’s proposed approach with respect to constraining the Last Consumer Change Date field to the current FRMP only. This includes access/visibility of the information, such as extending data access rights to participants associated with the NMI, enabling MC NMI discovery, and providing change notifications.</p> <p>Access to this field will enable the MC/MP to proactively manage metering obligations with respect to sites where a customer has refused installation of a smart metering asset, communications enablement and/or access. For example,</p> <ul style="list-style-type: none"> • MRAM metering due to customer refusal – customer moves out – there is the potential for this metering installation to be converted to a COMMS4D • Cannot resolve a comms fault or exchange a malfunctioning meter due to the customer not providing access and/or refusing a meter exchange – customer moves out – the change notification for the Last Consumer Change Date field update could trigger processes to resolve these metering challenges. <p>Additional supporting points in extending the access, visibility, and the provisioning of the change notification for the Last Consumer Change Date field to NMI participants beyond the current FRMP:</p> <ul style="list-style-type: none"> • The driver for a field to be included in MSATS has not previously determined whether NMI associated participants had MSATS 	<p>AEMO notes the respondents comment and refers to Table 1 Item 22 and Table 2 item 22 responses.</p>

No.	Topic	Participant	Participant Comment	
			<p>data access rights, especially if the derived benefit of the information extends beyond a participant role and delivers further industry benefits. That is, whilst CDR has driven the field to be added in MSATS, the outcome is that it is an MSATS field and there are use cases to support access to this information.</p> <ul style="list-style-type: none"> • Privacy – <ul style="list-style-type: none"> ○ If the relevant data field is brought under the umbrella of NMI Standing Data, then the usual NER confidentiality restrictions would apply ○ Most retailers provide the MC/MP with more specific customer details such as contact name and number/s when requesting metering services or as required to support their agreed processes. • Industry resource efficiency – as this will involve a schema change it is more efficient to deliver the E2E change. PLUS ES' proposal is an incremental change to the <u>current</u> design solution of the field requirements. There is concern that if the incremental changes are not included with this implementation, a cost benefits analysis would not support industry participants endorsing future drafted ICFs to implement the changes at a future date. <p>Forward scheduled metering service activity – enhances the ability to proactively manage notifications to the current customer in times of change, especially with the AEMC's endorsement of a smart metering acceleration.</p>	
5	Draft Report and Determination – Section 4.3.2	PLUS ES	<p>The 4th bullet point states:</p> <ul style="list-style-type: none"> • Extend the existing Metering Data Provision Procedures to include standing data. The effective date of changing this change is proposed to be set by AEMO. <p>PLUS ES is seeking clarification on the above point.</p> <ul style="list-style-type: none"> • If standing data was to be included in the scope of the MDPP, one would expect a change marked up version would be provided to: <ul style="list-style-type: none"> ○ Include the standing data and <p>Replace the current data provisioning requirements including participants with the CDR determined process for industry efficiency. i.e. The DB would not be required to further enhance their processes (business/systems) to cater for the provisioning of Standing Data nor Meter Data since CDR meets those deliverables.</p>	AEMO notes the respondents comment and refers to Table 5 item 3 response.

Figure 1 AGL Figure 1

Impact of Unknown / non-Contracted Customer



The AEMO proposal will only see the Change date set when the customer account starts, but does not consider when the account might end. As such, the consumer Date range may include a period for any Unknown consumer period.

AGL proposes that the date should also be set when a customer moves out to ensure that their relevant period is set, and there is no drift into a period of usage by an Unknown consumer.

General Position – Red Lumo

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.