

CONSUMER DATA RIGHT (CDR) MSATS CONSULTATION – PART 2

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: EnergyAustralia

Submission Date: 23 September 2022

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the Consumer Data Right consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO’s Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

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

Heading	Participant Comments
<p>Which of the proposed initial population options does your organisation prefer and why?</p>	<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 conversation with the customer). It is highly likely that the date will not reflect the date</p>

Heading	Participant Comments
	<p>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>

Heading	Participant Comments
	<p>We firmly submit that retailers will only be able to do this going forward, after Retailers implement the necessary changes to support LCCD and identify the right internal system transactions/fields that should trigger the LCCD.</p> <p>We have further concerns with Option 4 which will mean inconsistent treatment of our customer base. If a date is selected, we would prefer only one date or one way of calculating the date, across our entire customer base. This will make implementation easier and lower cost, and help us trace over what was done where customers have questions or complaints.</p> <p>In view of the limitations around Options 2-4, Option 1 is the clear preference. Option 1 will also minimise customer confusion and friction promoting the best CDR experience, because the length of usage data shared can be clearly and simply explained by referring to a conversation with the customer. i.e. we will be able to clearly say the LCCD is based off what the customer has told us.</p> <p>If Treasury were to go with another option, then we would select option 2 as a distant second preference, given Option 3 and 4 is unworkable.</p>
<p>Is there an alternative initial population option you believe would better achieve the desired objectives?</p>	<p>No</p>
<p>What do you believe should be considered in implemented your preferred initial population option?</p>	<p>See above discussion.</p>

Heading (EnergyAustralia has added this)	Participant Comments
<p>Other comments</p>	<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:</p> <ul style="list-style-type: none"> • 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>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>

Heading (EnergyAustralia has added this)	Participant Comments
	<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>1. Complexity of system changes</i></p> <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> <p>There will certainly be edge case scenarios like unknown consumers which will require further exceptions to the system changes.</p> <p><i>Number of systems</i></p>

Heading (EnergyAustralia has added this)	Participant Comments
	<p>EnergyAustralia will need to make changes to several systems.</p> <p><i>Complexity of process changes</i></p> <p>In addition to the complexities around identifying the system transaction triggers, the process arrangements to support the LCCD flag will also be challenging to implement, impacting all sales channels – including call centre, digital and third parties.</p> <p>This includes new scripting to ask the customer when they moved in or if they are moving in, and extra call time to deal with questions where customers find the questions intrusive.</p> <p>There will also need to be a full exception workflow to process customer complaints/requests to change the LCCD and potentially manually change the date in MSATS.</p> <p>Some awareness of the issue will need to be established for the whole front of house call centre, so that the calls can be routed to the right team.</p> <p><i>No capacity to take on LCCD change</i></p>

3. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
2.10 AEMO	Addition of: <i>(p) Populate the Last Consumer Change Date upon completion of Change Requests 1030 and 1040. The Last Consumer Change Date will be populated with the Actual Change Date of the Change Request.</i>	No comment.
12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	No comment.
Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of ‘Last Consumer Change Date’	No comment.

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

Section	Description	Participant Comments
7.3 Change NMI – Last Consumer Change Date	Addition of section 7.3 Change NMI – Last Consumer Change Date	No comment.

5. Standing Data for MSATS

Section	Description	Participant Comments
7.1 Field Definitions Table 12 CATS_NMI_DATA – Field Definitions	Addition of 'Last Consumer Change Date'	No comment.
7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	No comment.
7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	No comment.

