

CONSUMER DATA RIGHT (CDR) MSATS CONSULTATION – PART 2

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Telstra Energy

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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>Telstra Energy note accurate initial population of the LCCD field, or an appropriate fail safe mechanism, will be required to protect consumer data.</p> <p>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.</p> <p>In this case, we support Option 1.</p> <p>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.</p> <p>In this case, we support Option 2.</p>

Heading	Participant Comments
Is there an alternative initial population option you believe would better achieve the desired objectives?	Telstra Energy do not recognise an alternative option to achieve the desired objectives.
What do you believe should be considered in implementing your preferred initial population option?	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.

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>	1. 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

		<p>2. 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?</p> <ul style="list-style-type: none"> ○ Note: This may require AEMO/CATS reversal of an LCCD update made by the ‘temporary’/incorrect current FRMP.
<p>12.5 Change NMI – Last Consumer Change Date</p>	<p>Addition of section 12.5 Change NMI – Last Consumer Change Date</p>	<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) • 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>
Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of 'Last Consumer Change Date'	Telstra Energy have no comment relating to the proposed change.

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	Telstra Energy have no comment relating to the proposed change.

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'	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 alignment and protect CDR reform outcomes and avoid domestic violence ramifications.
7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	Telstra Energy have no comment relating to the proposed change.
7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	Telstra Energy have no comment relating to the proposed change.