

# CONSUMER DATA RIGHT (CDR) MSATS CONSULTATION – PART 2

## PROCEDURE CONSULTATION

## SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant: PLUS ES***

***Submission Date: 27/9/22***

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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
Which of the proposed initial population options does your organisation prefer and why?	
Is there an alternative initial population option you believe would better achieve the desired objectives?	<p>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 steps included, there is an increased risk that a customer may be provided data which they are not entitled to.</p> <p>Alternatively to reduce the risk,</p>

Heading	Participant Comments
	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>
<p>What do you believe should be considered in implemented your preferred initial population option?</p>	

### 3. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
2.2		<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>

		The intent of the obligation would align with similar clauses of this section and with the proposed AEMO obligation of section 2.10 (p).
2.10 AEMO	<p>Addition of:</p> <p><i>(p) Populate the Last Consumer Change Date upon completion of Change Requests 1030 and 1040. The Last Consumer Change Date will be populated with the Actual Change Date of the Change Request.</i></p>	
12.5 Change NMI – Last Consumer Change Date	Addition of section 12.5 Change NMI – Last Consumer Change Date	<p>Incorrect reference in section 12.5.3.</p> <p><u>12.5.3. Initiating Roles</u></p> <p><u>A Current FRMP may initiate a Change Request to change a NMI record in MSATS in accordance with section 12.4.4.</u></p> <p>Amend to section 12.5.4.</p>
	Change request Status Notification Rules – Table 12L	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>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>
<p>Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules</p>	<p>Addition of ‘Last Consumer Change Date’</p>	<p>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.</p>

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

Section	Description	Participant Comments
<p>7.3 Change NMI – Last Consumer Change Date</p>	<p>Addition of section 7.3 Change NMI – Last Consumer Change Date</p>	<p>Incorrect reference in section 7.3.3</p> <p><a href="#">7.3.3. Initiating Roles</a></p> <p><a href="#">A Current FRMP may initiate a Change Request to change a NMI record in MSATS in accordance with section</a> <b>Error! Reference source not found.</b></p>

		Amend to section 7.3.4.																																																																																																					
	7.3.5	<p>Incorrect reference in section 7.3.3</p> <p><a href="#">7.3.5. Timeframe Rules</a>                  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 <b>Error! Reference source not found.</b></p>																																																																																																					
	7.3.7	<p>Incorrect reference in section 7.3.3</p> <p><a href="#">7.3.7. Change Request Status Notification Rules</a>                  The Change Request Status Notification Rules are specified in <b>Error! Reference source not found.</b></p>																																																																																																					
	7.3.7	<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. i.e. undo the deletion of the Table 7-H</p> <table border="1"> <thead> <tr> <th rowspan="2">Status Change</th> <th colspan="2">FRMP</th> <th colspan="2">ENLR</th> <th colspan="2">LNSP</th> <th colspan="2">MDP</th> <th colspan="2">MPB</th> <th colspan="2">RoLR</th> <th colspan="2">RP</th> <th colspan="2">DRSP</th> </tr> <tr> <th>N</th> <th>C</th> <th>N</th> <th>C</th> <th>N</th> <th>C</th> <th>N</th> <th>C</th> <th>N</th> <th>C</th> <th>N</th> <th>C</th> <th>N</th> <th>C</th> <th>N</th> <th>C</th> </tr> </thead> <tbody> <tr> <td><a href="#">CANCELLED</a></td> <td>=</td> <td>Yes</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> </tr> <tr> <td><a href="#">COMPLETED</a></td> <td>=</td> <td>Yes</td> <td>=</td> <td>Yes</td> <td>=</td> <td>Yes</td> <td>=</td> <td>Yes</td> <td>=</td> <td>Yes</td> <td>=</td> <td>=</td> <td>=</td> <td>Yes</td> <td>=</td> <td>Yes</td> </tr> <tr> <td><a href="#">OBJECTED</a></td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> </tr> <tr> <td><a href="#">PENDING</a></td> <td>=</td> <td>Yes</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> <td>=</td> </tr> </tbody> </table> <p>The proposal for extending notifications would also apply to AEMO updates following the completion of CR1030/40.</p>	Status Change	FRMP		ENLR		LNSP		MDP		MPB		RoLR		RP		DRSP		N	C	N	C	N	C	N	C	N	C	N	C	N	C	N	C	<a href="#">CANCELLED</a>	=	Yes	=	=	=	=	=	=	=	=	=	=	=	=	=	=	<a href="#">COMPLETED</a>	=	Yes	=	Yes	=	Yes	=	Yes	=	Yes	=	=	=	Yes	=	Yes	<a href="#">OBJECTED</a>	=	=	=	=	=	=	=	=	=	=	=	=	=	=	=	=	<a href="#">PENDING</a>	=	Yes	=	=	=	=	=	=	=	=	=	=	=	=	=	=
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		This would enable participants to implement efficient operational processes.
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## 5. Standing Data for MSATS

Section	Description	Participant Comments
7.1 Field Definitions Table 12 CATS_NMI_DAT A – Field Definitions	Addition of 'Last Consumer Change Date'	<p>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 <b>Required</b>. 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.</p> <p>The Required status is described as this data must be provided if this information is available.</p>
7.2 Table 13 CATS_NMI_Data	Addition of 'Last Consumer Change Date'	<p>Typo –</p> <div data-bbox="981 799 1921 839" style="border: 1px solid #ccc; padding: 2px; margin: 5px 0;"> <span style="border: 1px solid #ccc; padding: 1px;">Last Consumer Change Date</span> <span style="border: 1px solid #ccc; padding: 1px;">LastConsumerChangeDate</span> <span style="border: 1px solid #ccc; padding: 1px;">ElectricityStandingData/MasterData/LastConsumerChange Date</span> <span style="border: 1px solid #ccc; padding: 1px;">dd-mmm-yyyy</span> <span style="border: 1px solid #ccc; padding: 1px;">xsd.date</span> </div> <p>Amend to dd-mm-yyyy.</p>
7.3 Table 14 CATS_NMI_Data Field value examples	Addition of 'Last Consumer Change Date'	

## 6. General comments

Heading	Participant Comments
<p>Access to the Last Consumer Change Date information</p>	<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"> <li>• MRAM metering due to customer refusal – customer moves out – there is the potential for this metering installation to be converted to a COMMS4D</li> <li>• 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.</li> </ul> <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"> <li>• The driver for a field to be included in MSATS has not previously determined whether NMI associated participants had MSATS data access rights, especially if the <b>derived benefit</b> 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.</li> <li>• Privacy –</li> </ul>

Heading	Participant Comments
	<ul style="list-style-type: none"> <li>○ If the relevant data field is brought under the umbrella of NMI Standing Data, then the usual NER confidentiality restrictions would apply</li> <li>○ 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.</li> <li>● 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.</li> <li>● 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.</li> </ul>
<p>Draft Report and Determination – Section 4.3.2</p>	<p>The 4<sup>th</sup> bullet point states:</p> <ul style="list-style-type: none"> <li>● 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.</li> </ul> <p>PLUS ES is seeking clarification on the above point.</p> <ul style="list-style-type: none"> <li>● 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"> <li>○ Include the standing data and</li> <li>○ 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</li> </ul> </li> </ul>

<b>Heading</b>	<b>Participant Comments</b>
	(business/systems) to cater for the provisioning of Standing Data nor Meter Data since CDR meets those deliverables.