

CONSUMER DATA RIGHT (CDR) CONSULTATION

PROCEDURE CONSULTATION

FIRST 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 initial 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. Questions on proposed CDR changes

Heading	Participant Comments
<p>Does your organisation support the proposal contained in the Issues Paper? If not, please specify the areas where your organisation does not support AEMO’s assessment and specify information as to your rationale</p>	<p>Telstra Energy do not have immediate concerns with the high-level intention of the proposed CDR MSATS change, though require more information to understand the proposals expectations and impacts to be able to support it or otherwise provide a view.</p> <p>Telsta Energy take the opportunity to note the CDR MSATS proposal imposes obligations on retailers to implement a component of CDR many years before they may be required to do so under the CDR rules. Under the CDR phased implementation approach, only tier 1 retailers will be required to deliver this functionality within the current proposed timeframes. Other retailers who have to build and deliver ahead of their data holder obligations commencing under CDR will need to build for a CDR solution. It would also therefore likely split CDR builds/implementations in to two components, or else it is just to be viewed as a market change and not related to CDR.</p>
<p>Are there better options to accommodate the change proposals that better achieve the required objectives? What are the</p>	

Heading	Participant Comments
<p>pros and cons of these options? How would they be implemented?</p>	
<p>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</p>	<p>The CDR reform introduces utilisation of the AEMO CATS system/procedures to provide for ‘consumer’ data. The definition of ‘consumer’, and more pointedly when a consumer changes, must be clearly defined in order to avoid errors in the population of the proposed new CATS field.</p> <p>For the purpose of the CDR MSATS consultation, Telstra Energy understands a consumer means <i>“the person who has, or persons who have, a contractual arrangement (deemed or express) with the FRMP for the delivery of energy at the relevant NMI’s connection point”</i>.</p> <p>However, over the period of a contractual arrangement with a FRMP, real life variables apply which include, but are not limited to:</p> <ul style="list-style-type: none"> - A consumer creates a joint account - A consumer removes/updates details of a joint account - A consumer changes account name <p>Telstra Energy are unclear how the CDR MSATS proposal applies these real life scenarios and recommend further industry consultation to clearly define the triggers to populate the new CATS field ultimately protecting the outcomes of the CDR reform.</p>
<p>Do you have any further questions or comments in relation to the proposals?</p>	<p>Telstra Energy make the following procedural/guideline change comments:</p>

Heading	Participant Comments
	<p><u>MSATS CATS Procedures v5.4</u></p> <ul style="list-style-type: none"> Section 2.2 of CATS Procedures currently provides FRMP SLA in provision of Customer Classification Code. Telstra Energy comment this section should also reflect FRMP SLA in provision of ‘Last Consumer Change Date’ Section 12.4 of CATS Procedures (CATS CR 5054/5055) indicates ‘Last Consumer Date Change’ and ‘Customer Classification Code’ are both mandatory requiring submission of both fields whenever CATS CR5054/5055 are submitted. Telstra Energy comment ‘the other field’ should be <u>optionally</u> provided whenever a CATS CR5054/5055 is submitted with existing CATS field remaining in CATS database if not provided (as per MSATS History Model). Section 3 of the CDR Issues Paper states ‘<i>The actual change date would be the effective date of the completed Change Request</i>’. However, Section 12.4 of CATS Procedures (CATS CR 5054/5055) provides ‘Proposed Change Date’ with allowance for a 140 retrospective business day period. Telstra Energy comment both ‘Last Consumer Date Change’ and ‘Customer Classification Code’ CATS fields must be capable of being retrospectively updated effective from the ‘Proposed Change Date’ (up to 140 days) and not effective from a CATS system process date. <p><u>Standing Data for MSATS v5.4</u></p> <ul style="list-style-type: none"> Description of the ‘Last Consumer Change Date’ field is ‘Indicates the date a NMI has changed customer’.

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	<p>Telstra Energy suggest inclusion of a more detailed, descriptive definition of this field to ensure accurate population of content as intended.</p> <p>For your consideration, the 'Last Consumer Change Date' maybe defined as <i>'The date a new customer commences to receive energy at the relevant NMI's connection point'</i></p>

3. Feedback on proposed minor amendments

Document	Participant Comments
<p>1. For the enumerations lists in the procedures document, values such as 'Sample Tested' and 'Three-Phase Three-Limb', to be changed from mixed case to uppercase, to improve implementation and validation for both AEMO and Industry.</p>	<p>None</p>
<p>2. For the Voltage Transformer Type enumerations, to remove descriptions where they exist in brackets e.g. 'CVT (Capacitive Voltage Transformer)</p>	<p>None</p>
<p>3. Where Ratio enumerations exist, remove spaces between characters e.g. '3300 : 110' to '3300:110'</p>	<p>None</p>
<p>4. INFORMATION' and 'STATISICAL' are to be truncated to 'STATIS' and 'INFORM' to fit within the 'USE' field 10 character max limit.</p>	<p>Telstra Energy comment STATS maybe a better and more common abbreviation of STATISTICAL (rather than STATIS) which might be confused with a misspelling of STATUS.</p>

Document	Participant Comments
5. Alignment of character requirements across aseXML and the Standing Data for MSATs MSATS document by including a reference to the Australian Standards requirements, where relevant in the document applicable.	None
6. For the correction of the GPSCoordinates format, implemented inas part of the r42 schema, to be reflected in the Standing Data for MSATs document: CATS_Meter_Register- Browser Cross Reference table.	None
7. For the truncated CurrentTransformerRatioAvailable and CurrentTransformerRatioConnected element names to be reflected in Table 4 CATS_Meter_Register – Browser Cross Reference.	None
8. For the VoltageTransformerTest aseXML path to be corrected to ElectricityMeter/VoltageTransformerTest in table 4 CATS_Meter_Register – Browser Cross Reference.	None
9. For GPS Coordinates of 0.00000 (5-7 decimal places), to align with the format specified in the NMI Standing Data Procedure, to be applied where no GPS coverage is available at the metering installation.	None
10. For the inclusion of missing Transformer Valid Values to be added to the Standing Data for MSATS document and for all values to be formatted from smallest to largest.	None
11. The CATS Procedures to be updated to ensure that 'Meter Manufacturer' and 'Meter Model' are only required when the status code is 'C' (Current) for CR3050 and CR3051 transactions (CiP_061).	None
12. For the CATS Procedures to be updated to remove the CR6500/1 Change ROLR Completed Notification from the Change ROLR section to align with the WIGS Procedures	None

Metering Procedure Changes

Document	Participant Comments
13. For the CATS Procedures to be updated for CRs (5001 & 5021) to include the NMI Classification of NCONUML as a classification code that have objections raised on it	None
14. Update the WIGS procedure for CR5021 to allow the ENLR (LR) to object.	None
15. Update the WIGS procedure to include BULK and XBOUNDARY to CR1500 to allow the MDP to send it to complete the CR.	None