

CONSUMER DATA RIGHT MSATS PROCEDURES

MINOR AMENDMENT PROPOSAL

PARTICIPANT RESPONSE TEMPLATE

Participant: *AGL*

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed minor amendment proposal associated with the Consumer Data Right MSATS Procedures effective date.

The changes being proposed to the effective date from 30 May 2023 to 1 November 2023 necessitate changes to AEMO's Retail Electricity Market Procedures. Noting, AEMO will consolidate procedures in the second half of 2023, which will include those changes impacted by the Consumer Data Right reform.

2. Questions on proposed changes

Questions	Participant Comments
Does your organisation agree with the proposed change to the effective date?	Yes
Does your organisation have an alternative proposal for implementation?	No

Questions	Participant Comments
Other comments - Testing	<p>AGL considers that testing needs to be coordinated between Participants and AEMO to ensure that the final outcome is that AEMO can produce the correct meter data for a CDR request.</p> <p>There is a potential that there could be up to 3 phases that need to be considered for testing, especially with timing and proposed changes to CDR rules not having a delivery date set from the Data Standards Body:</p> <ol style="list-style-type: none"> 1. R43 schema update to contain the field of LCCD with blank (negative test), we should already have this covered as part of the broader schema update 2. Implementation of CR5056/5057 transactions <ol style="list-style-type: none"> a. When AGL are ready to test (we'll need to understand from the delivery team a timeframe) and assuming September/October, if no DSB rules, then test of transactions going out from AGL and store in MSATS only b. If DSB provide rules post the implementation of rules, AGL will then need to test Usage API's for CDR to get the correct meter data. This should be catered by the CDR testing team the update to AEMO LCCD rules for CDR will ultimately impact a number of current rules.

Questions	Participant Comments
<p>Other comments - Transition</p>	<p>AGL considers that a transition plan is needed to allow retailers to populate MSATS with the relevant data prior to go live. For instance, scheduled BUT uploads leading to the go live date. However, all businesses would need to participate; e.g. provide only contract start dates of established contracts, inflight transfers to be either captured by a delta run or AEMO LCCD rules to set for CR1030/1040 post implementation.</p> <p>One issue we identified is that a customer that has completed an in-situ move prior to implementation of LCCD, they will largely be stuck with that date unless all parties have processes to capture and provide an update.</p> <p><i>Example and diagram below:</i></p> <p>AGL provide AEMO with a date of when AGL won the site (1st Oct 2023), customer first moved into the property (1st Jan 2022) thus restricting the amount of Usage data we provide for CDR.</p> <p>However, we need to ensure a date is set so not to provide meter data that was not the customers.</p> <div data-bbox="521 774 1848 965" style="text-align: center;"> <p>The diagram is a horizontal timeline with a blue bar. Three key events are marked with icons and text below the bar:</p> <ul style="list-style-type: none"> 1st January 2022: Represented by a house icon. Text below: "Customer Moves into their new property". 1st October 2023: Represented by a square icon with a curved arrow pointing right. Text below: "Customer transfers their Energy services to AGL". 1st November 2023: Represented by a target icon. Text below: "LCCD implemented for all energy retailers". </div>