# CONSUMER DATA RIGHT (CDR) CONSULTATION

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

**Participant**: Alinta Energy

**Submission Date**: 1ST June 2022

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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 |
|---|---|
| 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 | Alinta Energy does not support the proposal. Some time ago AEMO refuted industries proposal to have a life support flag in MSATS. AEMO had their legal team review the proposal and it was deemed 'customer information' that should not live in MSATS. Alinta Energy would suggest that AEMO have their same legal team review this new proposed field, 'last consumer change date' because many participants feel this is also deemed customer information. There is also a question of appropriateness. Alinta Energy feels there are other solution options that have not been properly assessed and should be workshopped. |
| Are there better options to accommodate the change proposals that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented? | AEMO being the data holder seems to have created this challenge. The data AEMO is charged with disseminating under CDR will already be old and the obligations of the data holder should have been placed with the party that collects/validates/disseminates this data today – the MDP. Alinta understands that it may be too late to |

Classification: INTERNAL

| Heading | Participant Comments |
|---|---|
|  | change the rule obligations of who the data holder is but feel it is important to note that this decision has inadvertently created another one. Secondly MSATS information is delayed and not helpful in determining what is actually happening at a site in real time. Alinta Energy believes there a number of alternative proposed solutions:<br><br>B2B solution would be better placed with proving more real time information to AEMO. AEMO already has access to the B2B platform and can interrogate the information of interest as is seen fit.<br><br>Alternatively, have the Accredited Data Requestor – ADR ask the customer to confirm whether they have been at the premises for at least two years. If the answer is no, the customer can then input how many months they have resided at their premises. The ADR would then only request data for the relevant period. The Accredited Person could also provide an option for the customer to indicate when they are unsure, in which case only current retailers data would be shared.<br><br>This process would be front-ended. Retailer systems and MSATS changes will not be necessary, as the customer's engagement with the ADR determines the relevant information. This means that the customer and the ADR that will benefit from the data are the only impacted parties, compared to AEMO's proposal which impacts the onboarding of every customer regardless of whether they use the CDR. |

Classification: INTERNAL

| Heading | Participant Comments |
|---|---|
|  |  |
| What are the main challenges in adopting these proposed changes? How should these challenges be addressed? | Alinta Energy does not believe AEMO have fully explored other alternatives and the proposal put forward is an unnecessary cost impost to industry . There is also a question of scope and whether it is appropriate for AEMO to make a unilateral decision that would change retailers obligations under the procedures governed by the NER to solely increase data flows in the CDR. The sentiment here is that the cart has gone before the horse in regards to suggesting a solution before it has been legally reviewed or workshopped appropriately. |
| Do you have any further questions or comments in relation to the proposals? | N/A |

## 3. Feedback on proposed minor amendments

| Document | Participant Comments |
|---|---|
| 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. | N/A |

| Document | Participant Comments |
|---|---|
| 2. For the Voltage Transformer Type enumerations, to remove descriptions where they exist in brackets e.g. 'CVT (Capacitive Voltage Transformer) | N/A |
| 3. Where Ratio enumerations exist, remove spaces between characters e.g. '3300 : 110' to '3300:110' | N/A |
| 4. INFORMATION' and 'STATISICAL' are to be truncated to 'STATIS' and 'INFORM' to fit within the 'USE' field 10 character max limit. | N/A |
| 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. | N/A |
| 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. | N/A |
| 7. For the truncated CurrentTransformerRatioAvailable and CurrentTransformerRatioConnected element names to be reflected in Table 4 CATS_Meter_Register – Browser Cross Reference. | N/A |
| 8. For the VoltageTransformerTest aseXML path to be corrected to ElectricityMeter/VoltageTransformerTest in table 4 CATS_Meter_Register – Browser Cross Reference. | N/A |
| 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. | N/A |

| Document | Participant Comments |
|---|---|
| 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. | N/A |
| 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). | N/A |
| 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 | N/A |
| 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 | N/A |
| 14. Update the WIGS procedure for CR5021 to allow the ENLR (LR) to object. | N/A |
| 15. Update the WIGS procedure to include BULK and XBOUNDARY to CR1500 to allow the MDP to send it to complete the CR. | N/A |