

CONSUMER DATA RIGHT (CDR) CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Red Energy and Lumo 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>Question 1</p> <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>Red Energy and Lumo Energy (Red and Lumo) strongly oppose the proposal contained in the Issues Paper with regards to the Consumer Data Right (CDR) changes.</p> <p>We understand the issue to be resolved is how to address the issue of sharing historical data from across multiple retailers. We agree with the industry position as articulated to AEMO at various forums, including the aseXML Standards Working Group (ASWG) and the Electricity Retail Consultative Forum (ERCF). At these meetings, retailers (including Red and Lumo) have agreed that MSATS is not a cost effective or viable solution to solving the issue. This position has also been discussed at length in the CDR technical working group (co-hosted by the Data Standards Body (DSB) and the Australian Energy Council (AEC)). At these meetings it was found that the MSATS solution was not viable as a stand alone solution, not without risk, and not supported by many (if any) retailers. Please refer to GitHub for further evidence of the lack of support of the MSATS solution and consideration of other options.¹</p> <p>Furthermore, we question whether due process has been followed by AEMO in this instance. We have concerns regarding the governance arrangements of AEMO making a change without the regulatory remit to proceed. We appreciate that Treasury has requested AEMO <i>consider</i> this, however, consideration and undertaking formal consultation to enable a change are very different. It is incumbent on AEMO to advise Treasury that MSATS holds NO customer information, and that the risks associated with introducing a field</p>

¹ GitHub commentary is available here: <https://github.com/ConsumerDataStandardsAustralia/standards/issues/195>

Heading	Participant Comments
	<p>in MSATS to identify when a NMI has changed account holder. These risks are borne by AEMO as well retailers, and customers should their privacy not be upheld.</p> <p>Treasury and AEMO have incorrectly asserted that “the introduction of such a field would ensure that when sharing of a consumer’s energy data occurs, following authentication by the consumer’s current retailer, metering data is provided for the time that the CDR consumer was associated with the NMI.” A NMI is static to an address, and the customer associated with it is transient. Retailers have no means to guarantee that a customer is a move in customer or an in situ customer. This will result in incorrect flags being placed in MSATS with very severe unintended consequences in some cases.</p> <p>For example, a customer who advises that they are an in situ consumer when in fact they were not the original account holder with the previous retailer. This leads to the new retailer not flagging the site as having a new consumer in place (such as a partner or a housemate taking over an account). This could lead to access to their usage information being shared with an unauthorised person, where this customer is a victim of family violence or has specifically requested their data not to be shared.</p> <p>This risk is even more pertinent in the release of raw interval data (i.e. type 4) which can provide a significant amount of information about a premise and usage pattern. Usage indicating the times or days during which a property is left unoccupied, or when at night appliances are no longer in use. The inadvertent release of this data to an unauthorised person can have real privacy and security risks for a consumer. Red and Lumo have serious privacy concerns as it requires a retailer to pass on meter data for a consumer for a period for which it has no record as to whether the meter data is actually relevant to them.</p> <p>As demonstrated above and as was also clearly articulated in discussions at the CDR Technical Working group, neither AEMO nor a winning retailer of a NMI, can guarantee the security of a consumer's information will be maintained with the proposed solution found in this Issues Paper. Therefore, Red and Lumo strongly oppose this solution as it stands, nor do we think AEMO should pursue this as a viable</p>

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	<p>solution without further discussions potentially running some workshops. We question whether AEMO will have additional obligations and therefore consequences in terms of managing customer’s privacy?</p> <p>Red and Lumo consistently request for AEMO to undertake a cost benefit assessment of this solutions, and alternate solutions. Without considering the costs and benefits of solutions, AEMO is not acting in accordance with its legislative requirements to consider the implications of the NEO and NERO. These costs include the introduction of this field to MSATS and new associated procedures. Ultimately, customers will pay for the costs borne by AEMO, distributors, retailers and any other party interacting with MSATS required to make changes (such as metering coordinators).</p> <p>Red and Lumo understand this change is not simply about accessing data to assess the possibility of switching to a retailer with a better energy offer - which considering the customers switching behaviour is not likely to happen regularly and thus the need for data not as frequent. Therefore, are there immediate benefits to be gained from needing to build and implement a solution, or is it more advisable to continue exploring all avenues and find a solution which first and foremost does not have a privacy risk for the consumer.</p>
<p>Question 2</p> <p>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?</p>	<p>Red and Lumo propose that, at this point in time, the most suitable option is for the current retailer to provide only historical data for the period the consumer is with the current retailer.</p> <p>It could be expanded that should data be required for an extensive period of time beyond when the new retailer took over a property, the request should be sent separately to the previous retailer. It would be appropriate to expect an ADR to work with consumers and clearly explain to them the process in requesting data from multiple data holders in a way which removes any confusion from consumers. Confusion regarding the fact that they will receive more than one retailer authorisation request. This solution provides:</p> <ul style="list-style-type: none"> ● No MSATS changes and therefore no additional costs to retailers and consumers ● No increased risk of data security or privacy breach

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	<ul style="list-style-type: none"> • Manages the risk of only having access to data for a shorter period of time <p>Red and Lumo continue to work with the DSB to consider alternate options, however, these options are outside the scope of AEMO’s consultation - as they do not involve any amendments to MSATS.</p>
<p>Question 3</p> <p>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</p>	<p>See response to question 1.</p> <p>These challenges can only be addressed by adopting a different solution, as per response to question 2.</p>
<p>Question 4</p> <p>Do you have any further questions or comments in relation to the proposals?</p>	<p>Scenario 5, Change of Account Holder – No Move In as described on page 10 of the Issues Paper is not an accurate representation of how <i>all</i> retailers manage a change of account holders.</p> <p>We note that energy retailers have obligations to gain explicit informed consent (EIC) to form a contract with a customer. In a scenario where responsibility is being transferred from one customer to another such as between partners or housemates, it is not as simple as just changing the name on the bill. The National Energy Retail Law prescribes EIC must be gained. Which is not clearly articulated in the Issues Paper.</p> <p>Should a retailer follow the process in AEMOs issues paper, it would be at risk of breaching the privacy act by virtue of not establishing a new account with the new customer. This should not be subject to the consultation process undertaken by AEMO as it is outside the scope.</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>Red and Lumo support this change.</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>Red and Lumo support this change.</p>
<p>3. Where Ratio enumerations exist, remove spaces between characters e.g. '3300 : 110' to '3300:110'</p>	<p>Red and Lumo support this change.</p>
<p>4. 'INFORMATION' and 'STATISTICAL' are to be truncated to 'STATIS' and 'INFORM' to fit within the 'USE' field 10 character max limit.</p>	<p>Red and Lumo support this change.</p>
<p>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.</p>	<p>Red and Lumo do not support this change until a full review has been undertaken into potential flow on impacts of all relevant fields which are specified in the Australian Standards. This review needs to consider the potential impacts across both B2B and B2M.</p>
<p>6. For the correction of the GPSCoordinates format, implemented in as part of the r42 schema, to be reflected in the Standing Data for MSATs document: CATS_Meter_Register- Browser Cross Reference table.</p>	<p>Red and Lumo support this change.</p>
<p>7. For the truncated CurrentTransformerRatioAvailable and CurrentTransformerRatioConnected element names to be reflected in Table 4 CATS_Meter_Register – Browser Cross Reference.</p>	<p>Red and Lumo support this change.</p>

Document	Participant Comments
8. For the VoltageTransformerTest aseXML path to be corrected to ElectricityMeter/VoltageTransformerTest in table 4 CATS_Meter_Register – Browser Cross Reference.	Red and Lumo support this change.
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.	Red and Lumo support this change.
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.	Red and Lumo support this change.
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).	Red and Lumo support this change.
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	Red and Lumo support this change.
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	Red and Lumo support this change.
14. Update the WIGS procedure for CR5021 to allow the ENLR (LR) to object.	Red and Lumo support this change.
15. Update the WIGS procedure to include BULK and XBOUNDARY to CR1500 to allow the MDP to send it to complete the CR.	Red and Lumo support this change.