



Consumer Data Right MSATS Procedures

Minor Amendments Proposal
for the National Electricity Market

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New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia

Australian Energy Market Operator Ltd ABN 94 072 010 327

Notice of proposal for minor rules consultation procedure

1. Change Proposal

AEMO is undertaking this consultation (“**Consultation**”) on its proposal (“**Proposal**”) to make the minor or administrative change to the following MSATS (“**Procedures**”) to change their effective date from 30 May 2023 to **1 November 2023** (“**Changes**”):

- **MSATS Procedures: CATS Procedure Principals and Obligations.**
- **MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs.**
- **Standing Data for MSATS document.**

The Procedures:

- Were published [here](#) with the Final Report Part 2 on the Consumer Data Right MSATS Consultation which AEMO published on 8 November 2022 (“**Final Report**”).
- Are published with this Notice as change marked to indicate Changes to the effective date. AEMO is not consulting on the other changes which are change marked. AEMO has already consulted on these other changes, as reflected in the Final Report. These other changes are change marked for information purposes only.

AEMO proposes to make the Changes under clause 7.16.7 of the National Electricity Rules (“**NER**”), in accordance with the minor rules consultation procedure under NER 8.9.4.

All documents for the Consultation will be published on AEMO’s website [here](#).

AEMO’s indicative timeline for the Consultation is outlined below.

Deliverable	Indicative date
Proposed Minor Amendment published	28/03/2023
Submissions due on Minor Proposal	14/04/2023
Final Report published	28/04/2023

2. Change Reason

AGL, Energy Australia and Origin Energy (“**Tranche 1 Retailers**”) have requested AEMO to implement the Changes to defer, from 30 May 2023 until **1 November 2023**, their obligations to populate the Last Consumer Change Date (“**LCCD**”) field.

The Changes would align the Tranche 1 Retailers and the Tranche 3 Retailers in terms of **1 November 2023** being the relevant LCCD obligation date for both. As background/context, the Tranche 3 Retailers have a compliance holiday in respect of the LCCD obligations between 30 May 2023 and **1 November 2023**, under the Final Report.

The Tranche 1 Retailers have indicated that:

- The risk exists between 30 May 2023 and **1 November 2023** that the LCCD field is populated but not maintained, therefore may be incorrect (“**LCCD Integrity Risk**”).
- The Changes would mitigate the LCCD Integrity Risk (“**LCCD Risk Mitigation**”).

In particular:

- The Changes would allow more time for energy data holders to standardise their processes where LCCD update/reversal is required (the current design does not cater for an industry-wide approach).
- The Tranche 1 Retailers are developing new processes to cater for a range of scenarios which can occur during a change of account holder, to ensure that the right system transaction flag is triggered. These scenarios include large customer scenarios, for which the CDR IT systems are still being built. In addition, conformance testing with the new flag is not yet possible.
- The Tranche 1 Retailers face additional implications for sales and service scenarios, such as call centres and customer complaints, given that new scripts and questions will need to be produced. The Tranche 1 Retailers expect that some customers will find the types of questions needed for LCCD information to be intrusive, impacting the accuracy of the LCCD information.

3. AEMO Proposal Acceptance

AEMO has accepted the proposal by the Tranche 1 Retailers in respect of the Changes, in particular, given the information which the Tranche 1 Retailers have provided on the LCCD Integrity Risk and the LCCD Risk Mitigation. The r43 schema for 30 May 2023 will contain the LCCD. However, updates to MSATS NMI Standing Data will not be accepted until **1 November 2023**.

Accordingly, effective from **1 November 2023**, the Proposal is:

- Allow the LCCD field to be populated via CR 5056 and CR 5057
- Stipulate that current retailers will populate the LCCD field in accordance with the Procedures, recognising that stakeholder preferred Option 1: Do not initialise, as the preferred initial population approach.
- Allow the Current FRMP, LNSP, MPB, MDP and RP to receive 'COMPLETED' LCCD Change Request Status Notifications.
- Enable AEMO's 'Move-In' CR 1030/1040 logic to automatically populate the LCCD field once it goes to a Completed Status.

For NMI discovery purposes, the LCCD field will be displayed from 30 May 2023 to 31 October 2023, but no value will be populated against this attribute.

Questions

- Does your organisation agree with the proposed change to the effective date?
- Does your organisation have an alternative proposal for implementation?

4. AEMO Procedural Assessment

AEMO considers the Changes to be minor or administrative because the Changes would:

- Affect the Tranche 1 Retailers only.
- Not introduce any new participant obligations or costs, or reduce rights, including in respect of non-Tranche 1 Retailers.
- Not require any related changes by participants, including changes to the ways in which

participants send or retrieve information.

- Not result in significant AEMO expenditure to implement the deferred introduction of the LCCD field in AEMO's IT systems on 1 November 2023.

5. **AEMO Comment Invitation**

In accordance with NER 8.9.4(a)(3), AEMO invites comments on the Proposal from any interested person within 10 business days after publication of this Notice, that is, by 5:00pm (Melbourne time) on **Friday 14 April 2023**.

AEMO will publish all comments received on AEMO's website. AEMO is not obliged to consider comments received after the closing time and date.

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