

Data Standards Body

Technical and CX Working Group

Decision Proposal 314 –Last Consumer Change Date (Phase 1)

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Context

This is the first Data Standards Body (DSB) consultation on the use of the Last Consumer Change Date (LCCD) field/value in the CDR Standards. The purpose of this paper is to identify scenarios and use cases where the LCCD value can be utilised by the standards to improve sharing of consumers' historical usage data. It also aims to identify potential risks related to LCCD usage and the need for consumer experience (CX) data standards.

The feedback received will be reviewed and incorporated into subsequent consultations as part of Phase 2. As per [noting paper 307](#), Phase 2 of LCCD consultation will focus on solution options with the main objective of identifying changes to the standards to incorporate LCCD for historical usage data sharing. Future Dated Obligation (FDO) dates will also be determined for the implementation of these changes.

Background

At present, sharing a consumer's energy usage data in CDR is limited to the duration they have been with their current retailer/FRMP (Financially Responsible Market Participant), not accounting for how long they have been at a premise. If a consumer changes a retailer, their usage data associated with the previous retailer cannot be shared. This is detrimental for consumers who change retailers frequently.

To help address this, AEMO has conducted its own industry consultation process to introduce a new field called Last Consumer Change Date (LCCD) in its Market Settlement and Transfer Solutions (MSATS) database. This field will indicate when a National Metering Identifier (NMI) has changed account holders. It will enable AEMO to release sufficient metering data in circumstances where a consumer has changed retailers for a premise during the period for which they wish to share their usage data.

Below is a summary of the outcome of AEMO's consultation:

- The LCCD will be defined as *"The date a consumer starts or ends as the account holder for a premise"*.
- The value of the field will be overridden whenever there is a change in account holder. Historical values will not be retained.
- The field is expected to be introduced into MSATS on 1 November 2023 and will not be populated initially.

- The field will be progressively populated by retailers according to procedures established by AEMO and retailers when an account holder changes for a premise.
- Population of the field will be applicable to all retailers from 1 November 2023.

Further details about AEMO’s consultation can be found via this [link](#).

Scope of this consultation

The scope of this consultation is limited to the use of the LCCD in the standards. The processes associated with population, maintenance, conflict resolution and support with the LCCD field and value itself is outside the scope of the DSB and this consultation.

Decision To Be Made

Determine solution options and scope for phase 2 consultation on incorporating LCCD into the standards

Consultation Topics

1. Scenarios for LCCD use

The primary use case of the LCCD value/field in the standards is to enhance the sharing of consumers' historical energy usage data. This can be achieved by AEMO sharing energy usage data via the standards up to the LCCD value, allowing access to usage data beyond the consumer's current retailer relationship.

If the LCCD value is leveraged, the associated energy usage data would be shared by requesting the [energy:electricity.usage:read](#) scope and accessing [Get Usage For Service Point](#); [Get Bulk Usage](#); and [Get Usage for Specific Service Points](#).

However, as per the outcome of AEMO’s consultation, the LCCD field will be populated in MSATS by retailers over time, and it will not be available for all NMIs initially. Therefore, the standards will need to account for both scenarios where the LCCD is available and not available, which are discussed below.

Scenario 1: LCCD is available:

When the LCCD value is available for a given NMI, the consumer’s usage data can be shared up to the LCCD value or 24 months from the date of request, whichever is earlier. The sharing is proposed to be done as per the following logic:

For open accounts:

- AEMO will apply the LCCD limitation and restrict usage data returned to the period after (and inclusive of) the LCCD only where:
 - LCCD is populated; and

- Request is received from the current FRMP Participant ID (current registered retailer); and
- Request is for a period ending after the LCCD; and
- Request is for a period no more than 24 months from the date of request

For closed accounts:

- Since the LCCD value will be overwritten whenever there is a change in account holder, usage data for closed accounts will be limited to the duration the requesting retailer was the FRMP for the given NMI

Scenario 2: LCCD is not available:

In the scenario where the LCCD value is not available for a given NMI, the usage data will be shared how it currently is as noted below:

- AEMO will return data for the requested date range limited by how long the requesting retailer has been the FRMP for the given NMI
- The retailer must ensure that the date range for requested usage data is not outside the bounds of the specific CDR consumer and for a period no more than 24 months from the date of request

Note: In both the scenarios, the necessary CDR rules and data standards must be met for any data to be shared.

The DSB is seeking feedback on:

1. The above scenarios and the respective proposals on leveraging the LCCD value
2. Any other scenarios that may be applicable for LCCD based usage data sharing
3. Any other eligibility criteria for sharing historical usage data based on the LCCD field/value

2. Consumer Experience (CX) considerations

The DSB has identified the following options and sub-options for CX standards to facilitate LCCD usage:

- **Option 1** – Allow historical data from previous retailers to be shared by default.
 - a – CX standards could require that Data Holders (DH) notify consumers when historical data from previous retailers may be shared; Accredited Data Recipients (ADR) would already be required to state the historical range of the data as per the CDR rules
 - b – Historical data from previous retailers could be shared without an explicit notification from DHs
- **Option 2** – Only allow historical data from previous retailers to be shared if a consumer actively chooses to do so.
 - a – CX standards could require DHs to allow consumers to actively select or deselect the sharing of historical data from previous retailers if the LCCD value is available
 - b – CX standards could require ADRs to seek explicit permission to access historical data from previous retailers

Option 1a is recommended based on the DSB’s analysis. This would minimise unnecessary friction and the risk of use case failure while maintaining informed consent.

Option 1b is not recommended. This option would risk compromising informed consent, and the DSB considers that the requisite information could be surfaced in a way that is accessible and would not increase cognitive load.

Options 2a and 2b are not recommended. These options would result in unnecessary friction and increase the risk of use case failure. ADRs are already required to minimise the range of historical data collected and are also required to specify this range. If actively giving a specific permission was deemed necessary, Option 2a would be preferred over Option 2b as the latter may result in redundant interactions in addition to the risk of use case failure. However, Option 2a would result in additional DH impacts to ensure that AEMO only shared historical data if consumer permission was given to the DH to do so. If both Options 2a and 2b were considered, consumers would need to give the same permission to both ADRs and DHs and as such would compound these risks.

These CX options will only need to be considered if the proposal to leverage the LCCD value to share historical retailer usage data is supported. If leveraging the LCCD value is supported, the CX option(s) outlined in the previous section would then only apply if the consumer were asked to share the [Electricity Usage](#) data cluster, which would provide access to the energy:electricity.usage:read scope.

The DSB is seeking community input on the risks, trade-offs, and implications of the above options.

These questions can be used to guide feedback:

1. Should historical metering data from previous retailers be shared by default?
2. If so, should consumers be notified that this will occur?
3. Should historical data from previous retailers only be shared if a consumer actively chooses to allow it?
4. If so, should consumers be given the ability to give this permission to the ADR, or DH, or both?

3. Risks

The key known risk associated with the use of the LCCD value for sharing historical energy usage data arises if the value is incorrectly set. This would result in either:

- Less data being shared if the LCCD value is greater than the actual customer move in/move out date
- More data being shared if the LCCD value is less than the actual customer move in/move out date

This risk was discussed in a DSB facilitated workshop on 23 August 2022, which focused on determining a viable approach to identifying the current owner of the NMI to help set the LCCD value correctly.

Summary of workshop outcomes:

- Following solutions were discussed:
 - Option 1 - Default option of no DSB and CDR facilitation
 - Option 2 - Retailer as an ADR
 - Option 3 - CDR enabled Data Holder to Data Holder direct API call
 - Option 4 - CDR enabled AEMO-facilitated API call
 - Option 5 - Utilising existing NMI discovery mechanisms
 - Option 6 - A central utility for customer identity exchange.

- No single option was preferred. The key insight was that the retailers could choose from various available options with differing levels of complexity and implementation cost to help set the LCCD value during their move-in/move-out process at their discretion.
- Concerns regarding vulnerable groups and situations (such as domestic violence) were also discussed. Feedback noted that these concerns could be satisfactorily addressed even with adopting the default option without exacerbating the existing issues faced by vulnerable individuals during the move-in/move-out process.

More details about the workshop outcomes can be found via this [link](#).

An additional measure, which can work in conjunction with options discussed in the workshop, is to temporarily restrict the sharing of historical data to one FRMP change. This would serve as an interim solution to facilitate the gradual implementation of the LCCD change across the industry, and would be phased out over time (e.g. after 6 months). It could be done in a way that only AEMO needs to make a change, which could be extended to multiple FRMP changes at a later date without retailers being impacted.

However, it's important to note that this additional measure can significantly limit the sharing of consumers' historical usage data, particularly for those who have recently changed retailers. It may not effectively address the identified risk and would necessitate additional effort from either AEMO, retailers, or both for a temporary period.

Based on the workshop outcomes, the default Option 1 is being proposed as the mitigation for the aforementioned risk. Retailers will need to develop appropriate processes and validations to ensure the right date is being set for the LCCD field during any move in/move out.

Any data quality concerns with regards to the LCCD value will be addressed through existing data correction processes in place.

The DSB is seeking feedback on:

1. The above noted risk and the proposed solution of no DSB/CDR facilitation in setting the LCCD value
2. The additional measure of temporarily limiting historical data sharing to one FRMP change
3. Addressing LCCD data quality concerns via existing data correction rules and processes
4. Any other risks for the DSB and the standards to consider in incorporating the LCCD value for sharing historical usage data

5. Inclusion of the LCCD field via CDR standards

The LCCD field will be in the MSATS database as part of NMI standing data and will hold the date value of when a consumer starts or ends as the account holder for a premise. Whilst this makes sharing its value via the data standards possible as per the rules, the DSB does not recommend sharing it for the following reasons:

- It is designed as an administrative field to help improve sharing of usage data, rather than being shared directly. It can be excluded from sharing similar to other administrative fields
- It is a customer sensitive field. Sharing it may introduce privacy risks by potentially exposing when a consumer has moved premises. However, an ADR may be able to infer this date based on the extent of the usage data shared.

If the value is shared, it could be by introducing a new field in the [Get Service Point Detail](#) API.

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| 1. Feedback is welcome on whether the field should be shared as part of standing data. |
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Recommendations

Below is a summary of the DSB's recommendations for the consultation items presented in this paper:

1. Scenarios for LCCD use
 - Scenario 1 – Use the LCCD value to allow sharing of historical usage data beyond current FRMP relationship based on recommended logic
 - Scenario 2 – Share usage data as per current state limiting it to current FRMP relationship
2. Consumer Experience (CX) considerations
 - Option 1a - Allow historical data from previous retailers to be shared by default. Require Data Holders (DH) to notify consumers when historical data from previous retailers may be shared; Accredited Data Recipients (ADR) would already be required to state the historical range of the data as per the CDR rules
3. Risks
 - Option 1 - Default option of no DSB and CDR facilitation
 - LCCD data quality issues to be addressed through existing data correction processes in place
4. Inclusion of the LCCD field via CDR standards
 - LCCD value will not be shared via the standards

Implementation Considerations

The DSB believes that the recommended options should have minimal impact to adopt for participants. FDOs, where applicable, can be determined for specific changes during phase 2 of the consultation. Feedback on further implementation considerations is welcome.

The DSB welcomes feedback on any other matters and issues related to the use of the LCCD value/field in the data standards that have not been noted in this paper.