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Data Standards Body

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

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AGL Energy (AGL) welcomes the opportunity to provide feedback to the Phase 1 of Last Consumer Change Date (LCCD) consultation. AGL supports the implementation of LCCD to allow consumers to gain the full benefit of 24 months of usage data.

### Scenario 1 – LCCD is populated

AGL notes that once LCCD is populated, all Retailers must ensure the accuracy of LCCD. A partial implementation of LCCD, where some Retailers update LCCD and some do not will lead to increased risk (see risk raised below).

AGL notes that in some circumstances occupants at a supply address may change without any change in FRMP. This can occur when power is already on and the new occupant contacts the existing FRMP to retrospectively claim ownership of usage being recorded. In this circumstance, it is incumbent on Retailers to limit usage data date ranges to align to their current occupant only.

### Scenario 2 – LCCD is not populated

By default, consumers who churn retailers frequently but do not move to new supply addresses in that time, will have their window of sharable meter data restricted. While this is necessary to prevent privacy concerns stemming from usage data being shared from a previous occupant, this has further implications.

Should the consumer seek to access the full benefit of 24 months of historical data, the current FRMP would need to work with their customer to independently verify their time of occupation. AGL notes that there is no industry standard for such a process, which will likely lead to inconsistent application and outcomes. Importantly, this is likely to result in an unsatisfactory CDR experience because it puts the burden of proof back on the consumer.

To address this, AGL proposes that, wherever possible, LCCD is **pre-populated** immediately prior to the adoption of LCCD. This should be achieved by working with AEMO, using the Blind Upload Tool (BUT) in the lead up to deployment. AGL has engaged with AEMO and requested support in this action.

### Consumer Experience CX Considerations

AGL supports the adoption of Option 1a. AGL notes that this option implies the presence of CDR Standards dictating the implementation of such a notification. AGL's preference is for permission to be given to Data Holders only.

### Risks

AGL supports the view that all energy Retailers must support the upkeep and overall validity of LCCD at all times, as required by the MSATS procedures. We note that while all retailers are obligated to maintain the LCCD, not all are required to participate in CDR, and we note that they may have less focus on this matter.



This is important because, once populated, Retailers who gain ownership of a supply address via insitu transfer will be blind to previous customer movements and the LCCD will be assumed to be correct in all circumstances. A partial implementation of LCCD will increase the risk of inaccuracy, leading to potential privacy concerns.

#### **Inclusion of the LCCD field via CDR Standards**

AGL does not support the inclusion of LCCD in API payloads to ADRs.

#### **Implementation Considerations**

While we have LCCD in MSATS in our existing roadmap, AGL's resourcing constraints, and current focus on meeting its Tranche 2 obligations expected in May 2024, mean we will not be able to support additional LCCD requirements relating to new CDR Standards until Q3 2024. This will likely align for Large Retailers who also have large scale Tranche 4 obligations coming online in May 2024.

If you would like to discuss any aspect of AGL's submission, please contact me at [aferris@agl.com.au](mailto:aferris@agl.com.au).

Yours sincerely,

Andrew Ferris

CDR Manager

**AGL Energy**