

Data Standards Body

Noting Paper 351– LCCD Risk Workshop Summary

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Context

On 19 March 2024, the Data Standards Body (DSB) facilitated an in-person workshop with Energy participants to discuss risks associated with using Last Consumer Change Date (LCCD) in the Consumer Data Right (CDR) data standards to improve the sharing of a consumer's historical usage data.

This Noting Paper provides a summary of the workshop results covering the key risks, analysis, and next steps for further consultations.

Background

The LCCD field was introduced to the Market Settlement and Transfer Solution (MSATS) in November 2023¹ to address the issue of electricity usage data sharing being limited to the duration a consumer has been with their current retailer as opposed to their duration at the premises.

Incorporating the field into MSATS was the first step towards implementing the solution in supporting a consumer's access to their electricity usage data whilst consistently occupying a given premises. The proposed next step was to adopt the use of LCCD in the data standards and enable improved sharing of historical electricity usage data. The DSB began consultations to progress this in 2023². Whilst risks have been considered and discussed as part of the consultations, the community feedback highlighted the need for a more focused discussion on risks.

Workshop Overview

The purpose of the workshop³ was to gather information about the risks of using and not using LCCD to share electricity usage data in the CDR. It was not a formal risk assessment workshop. The DSB structured and facilitated the workshop to help participants capture, classify and prioritise risks on a self-determined basis. This information would help assess if the risks stem from the CDR or external factors, and whether additional controls within the CDR are necessary.

¹ Information about AEMOs consultation can be found here - <https://aemo.com.au/consultations/current-and-closed-consultations/consumer-data-rights-msats-consultation>

² See [Noting Paper 307](#) and [Decision Proposal 314](#) for details on DSBs LCCD consultations.

³ The workshop slides are included in the [Appendix](#). They cover the objective, details of activities along with the tools (e.g. risk matrix) used during the workshop to help with the prioritisation and categorisation of risks.

Workshop participants included retailers (Origin Energy, AGL, Red Energy, Simply Energy and EnergyAustralia), CDR vendors (Biza), the Australian Energy Market Operator (AEMO), and representatives from the ACCC, Treasury and the DSB.

Risk Analysis

The workshop began with participants individually identifying 19 risks. Through subsequent group activities, discussions, and feedback, 5 of these risks were voted as the most important to address for the use of LCCD in the standards.

Participants who were given two votes each to place on risks they deemed to be the most important. They could place both votes on the same risk if desired. Some risks did not receive any votes. The table below lists the risks verbatim as captured by participants that received votes, ordered by the number of votes they received:

Risk #	Description	Likelihood	Consequence	Total # of participant votes
1.	<i>"Family violence risk, sharing victim whereabouts data with perpetrator"</i>	Low	High	8
2.	<i>"Data shared inappropriately when LCCD is wrong"</i>	High	High	7
3.	<i>"Data related to incorrect consumer shared"</i>	Low	High	4
4.	<i>"Retailer compliance implication due to incorrect LCCD set by other retailers"</i>	High	Low	2
5.	<i>"Isolated use in energy only results in poor problem/risk understanding"</i>	High	Low	1

Note: Risks that received no votes have been excluded

Examples of other risks identified were the negative impacts on use cases if LCCD was not supported in CDR, along with the risk of the problem space being insufficiently understood due to isolated use in energy.

The risks can be grouped into the following three categories, which are discussed in the following sections:

1. Risks related to exacerbation of existing harms
2. Risks related to sharing of incorrect usage data
3. Risks associated with the burden of setting the LCCD value correctly

1. Risks related to exacerbation of existing harms

The risk that received the highest number of votes related to domestic violence, specifically, the risk of perpetrators accessing usage data to scrutinise a victim's behaviour and movements. An example given was where a perpetrator may move out of a victim's premises and then assign a new retailer to that premises, and subsequently access and scrutinise the victim's usage data. One of the causes of this issue noted by participants is the ability for a person to sign up for energy accounts without Know Your Customer (KYC) or other verifications.

Retailers noted that this is an existing risk in the energy sector outside of the CDR ecosystem, as historical electricity usage data can currently be accessed⁴ and potentially misused. The risk is addressed by regulatory requirements and consumer protections under National and Victorian energy rules. These requirements include for retailers to have a family violence policy and meet minimum standards of conduct including training for frontline staff, account security measures and debt management practices.

Protections also exist within the CDR rules that allow DHs to refuse disclosure of data where they consider it necessary to prevent physical, psychological or financial harm or abuse⁵.

As this is an existing risk outside of the CDR, it was also noted that adopting the LCCD field in the standards would not newly introduce this risk⁶. The risk would continue to be managed through the existing energy rules and protections mentioned above.

2. Risks related to the sharing of incorrect consumer usage data

Where retailers fail to capture the LCCD value correctly, further risks could arise if incorrect usage data is shared. For example, usage data relating to another consumer could be shared, such as a previous occupant, resulting in energy use cases providing results that are not tailored to the relevant consumer. Concerns were also raised about liability and compliance risks in relation to sharing a consumer's usage data where the LCCD field was not set correctly.

These risks, along with necessary mitigations, already exist within the energy sector. For example, retailers often rely on customer-provided information during onboarding (e.g. asking for NMI located on the electricity bill), which may not have been sufficiently verified. This occasionally leads to incorrect customer transfers. The Australian Energy Regulator (AER) and the Essential Services Commission (ESC) hold retailers accountable for implementing appropriate processes to manage such incidents and exercise discretion to enforce regulations when necessary. The LCCD change would be a new aspect of this existing dynamic and manageable for compliance purposes.

3. Risks associated with the burden of setting the LCCD value correctly

Participants suggested that existing practices were insufficient to support accurate population and management of the LCCD value. A consumer may, for example, provide an incorrect date or refuse to provide a date altogether.

These risks were noted despite the LCCD field having been implemented in MSATS since November 2023, with the expectation that retailers have processes in place for collection and corrections.⁷ It should also be noted that currently, setting of LCCD values in MSATS is outside the scope of CDR.

These risks could be viewed as issues relating to data quality and privacy safeguards that exist outside of CDR, rather than risks that are inherent to LCCD being supported in CDR.

⁴ <https://www.aemc.gov.au/rule-changes/customer-access-to-information-about-their-energy>

⁵ Refer to [Rule 3.5 in Part 3 Division 3.2](#)

⁶ Concerns regarding vulnerable groups and situations (such as domestic violence) were discussed in a [workshop](#) on 23 August 2023. Feedback noted that these concerns could be satisfactorily addressed even with adopting the default option without exacerbating the existing issues faced by individuals experiencing vulnerability during the move-in/move-out process.

⁷ Various options to address this were also discussed the [workshop](#). This included a range of discretionary options for retailers to identify the current owner of the NMI to help set the LCCD value correctly.

Assessment

Based on the DSB's assessment, the risks identified in the workshop would not inherently be caused by the introduction of LCCD to the CDR, and are largely dealt with under existing, non-CDR protocols. The DSB's response to the three key risk categories include that:

1. The risks related to existing harms arise outside of CDR, are dealt with under non-CDR protocols, and are not unique or inherent to the sharing of LCCD in CDR.
2. The risk of sharing incorrect data is a systemic CDR consideration as a result of existing industry practices, and is not inherent to LCCD support in CDR.
3. The burden of setting and managing the LCCD value is a data quality and privacy safeguard problem that retailers would be expected to address following the introduction of LCCD to the MSATS, and as such would not be inherent to the CDR supporting LCCD.

The analysis leads to the following observations:

- No new or unknown risks were identified. All risks have been discussed in various forums, consultations and discussions in the past
- The risks that were noted and discussed are due to existing non-CDR protocols and practices within the energy sector
- Discussions and input on LCCD have been limited to Data Holders and CDR agencies; further engagement with ADRs to evaluate the value of LCCD would be beneficial
- There were no findings to indicate further consultations on the use of LCCD in the CDR to improve historical usage data sharing should not proceed

Next Steps

Based on the workshop outcomes and analysis, the DSB will consider further consultations on LCCD with a view to address the gap in ADR input.

Appendix

Workshop Slides



Agenda

Welcome & Housekeeping	5m
Introduction & Overview	15m
Workshop Activities	1h30m
Playback and Wrap up	10m

Welcome & Housekeeping

3 | Welcome & Housekeeping

Introduction & Overview

4 | Introduction & Overview

WHAT'S THE PROBLEM

Context

Access to a consumers energy usage data is limited to the duration they have been with their current retailer, as opposed to the duration at the premise.

This is detrimental for consumers who change retailers frequently and contradicts one of the fundamental goals of CDR.

- Last Consumer Change Date (LCCD) is a means to address this problem
- It is a new field in MSATS, introduced in November 2023
- It's value is set by the retailer to the date an account holder changes for a given NMI/connection point
- The value allows AEMO to know when an account holder changed for a given premise. That date can be used as the data boundary for historical usage data sharing instead of current retailer relationship
- The next step is to adopt and use LCCD in the CDR standards to enable improved sharing of historical energy usage data
- This risk workshop is a result of feedback received in previous DSB consultations on adopting the use of LCCD into the CDS

WHY ARE WE HERE

Purpose

Purpose of workshop:

- To understand the risks related to LCCD in sharing consumer energy usage data via the CDR data standards
- To incorporate information gained in decisions for consideration by the Chair

Objectives:

- Identify risks arising from **using** and **not using** LCCD in CDS
- Categorise these risks
- Understand how they can occur (cause of risk)
- Prioritise them (likelihood and consequence of risk)

It is not to:

- Discuss alternatives to LCCD
- Discuss mitigations

Workshop Activities

7 | Workshop Activities

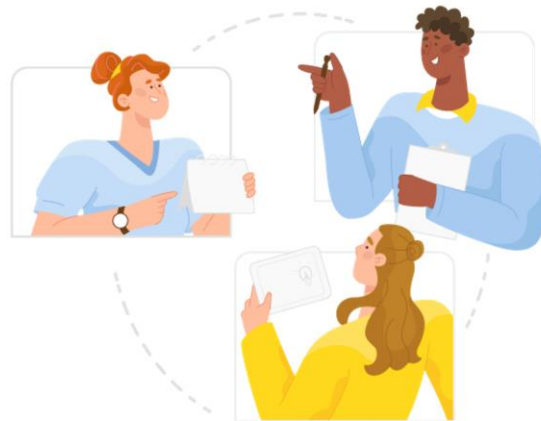
Activities

Icebreaker

 5 min

Instructions

- Introduce yourself to the table. Tell your new table mates:
 - Your name
 - Your organisation
 - 1 non-work fact about yourself



Next activity: Individual requirements elicitation 

8 | Workshop Activities

Activities

Individual requirements elicitation

10 min

Risk: usage data for wrong consumer shared
Cause: - Wrong LCCD value set during onboarding customer

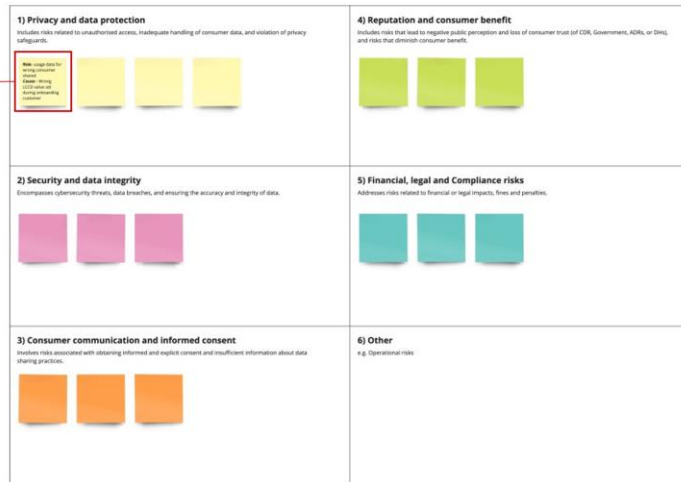
Instructions

- Individually write risks per category
- Post-it notes color coded per category
- Stick post-it notes on your A3 paper with categories (1 A3 per person)

Notes:

- Capture risk and cause of risk
- Consider risks of not doing LCCD as well

Next activity: Internal group activity pt 1 →



Activities

Internal group activity – pt 1

25 min

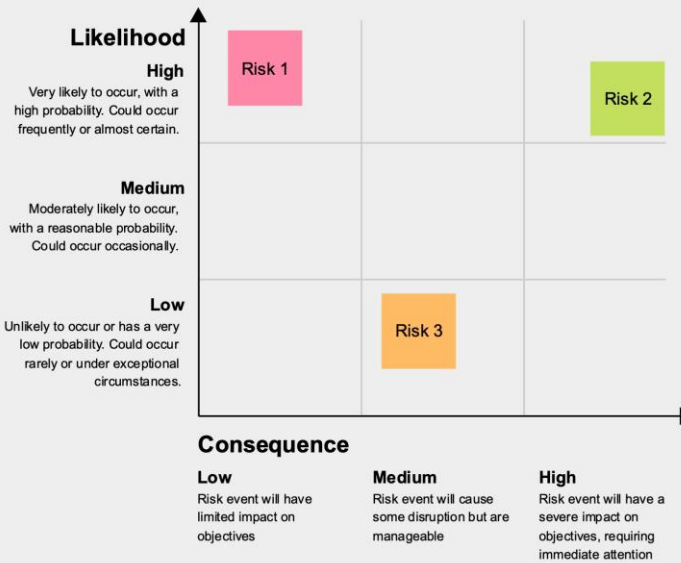
Instructions

- Individual to share risks back with group (3 5 min each)
- Put post-it notes on butcher's paper with risk matrix

Notes:

- Consider risks of not doing LCCD as well

Next activity: Internal group activity pt 2 →



Activities

Internal group activity – pt 2

 10 min

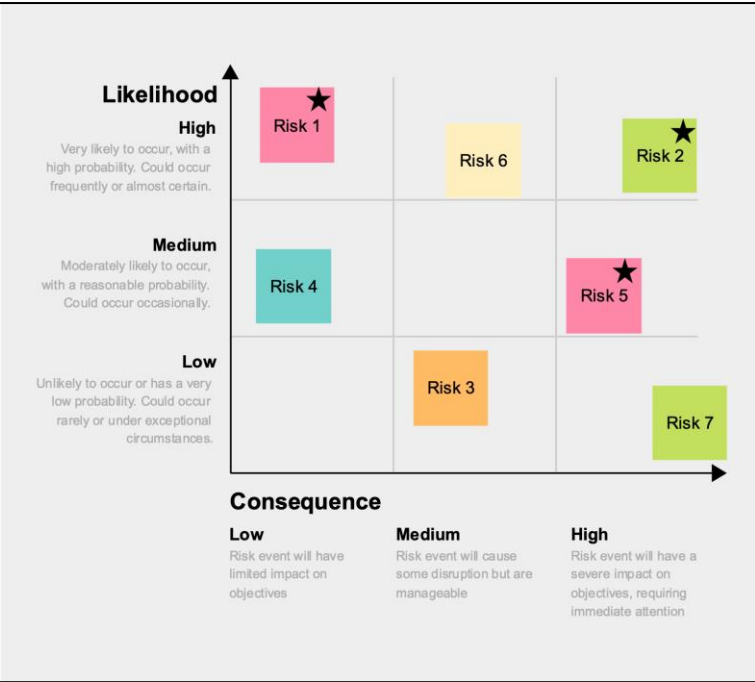
Instructions

- As group, decide on top 3 risks to share back (draw a star on your top 3)
- Group to decide on presenter(s)

Notes:

- Group can re-arrange position of risks on the matrix
- Note the reason why it is top pick
- Consider risks of not doing LCCD as well

Next activity: Group shareback + discuss ➔



Activities

Group shareback + discuss

 30 min

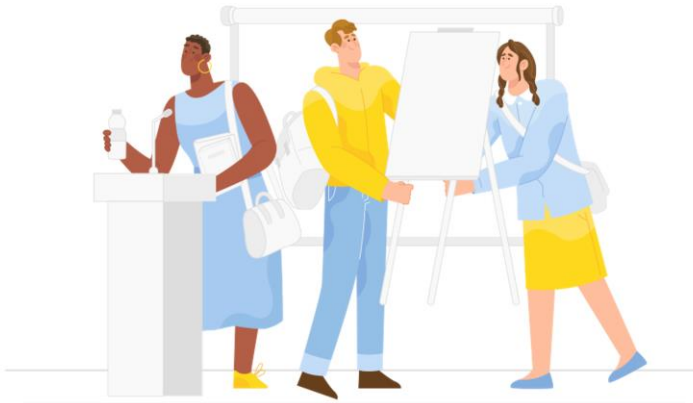
Instructions

- Group's presenter(s) share back top 3 risks
- 5 min per group

Notes:

- Include the reason why it is top pick
- Highlight any risks of not doing LCCD as well

Next activity: Entire room to vote ➔



Activities

Entire room to vote

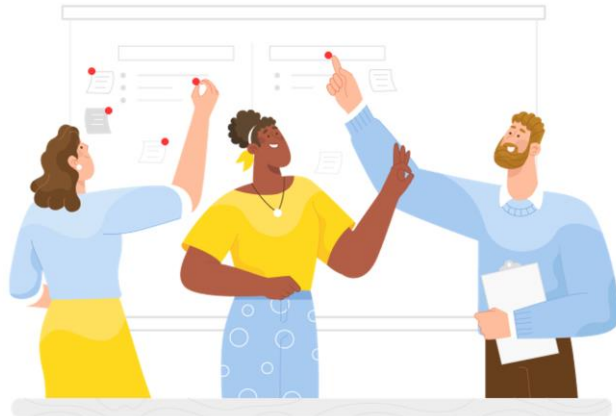
🕒 10 min

Instructions

- Individually use provided stickers to select the two most important risks to address
- Vote across all groups

Notes:

- Two stickers per person
- Votes can be placed on any risk (not just 'key' risks)



Next activity: Playback based on votes ➔

13 | Workshop Activities

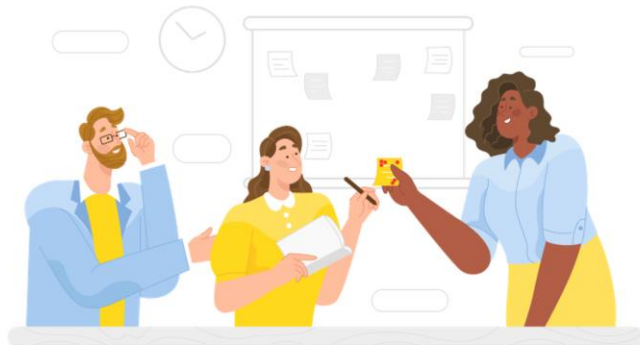
Playback & Wrap up

Playback based on votes

🕒 10 min

Instructions

- Facilitators playback top voted risks



14 | Playback & Wrap up

Playback & Wrap up

Next steps

- Publish noting papersummarising workshop outputs
- Plan for subsequent consultations incorporating acquired risk information



15 | Playback & Wrap up

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