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Evolving MTR Supplementary Consultation

Thank you for the opportunity to submit on the supplementary consultation for the 'Evolving multiple trader and switching' project. Our submission will be primarily commenting on the technical aspects of the proposed MTR structure, rather than any specific commentary around the overall benefits and costs of the Authority's proposed approach.

Overall, we support the Authority's proposal to simplify the MTR approach. It is prudent to retain the existing Registry format for most ICPs, while only ICPs that have MTR enabled have this new structure. However, we believe that there is some further clarification needed before the Authority finalises this proposal:

1. **Where will the MTR flag be logically stored within the ICP event structure?**
   Currently, all ICP based data is assigned to a specific event type (e.g. trader, address events, etc.), each of which is generally the responsibility of a single participant at a given time. It is unclear from the proposal where the MTR flag will be placed within this structure.

2. **Which event will be updated when a generation trader gains responsibility for an ICP?**
   Under the new proposal, it appears as if MTR data will be contained within the metering event. This potentially will cause complications by decoupling the creation of new metering events from deliberate actions by MEPs. This also intermingles legitimate meter configuration changes (or administrative changes by MEPs) and changes in the generation trader, making the history of a given ICPs generation traders much less straightforward to track.

3. **What if more information about the generation trader is needed?**
   With the new proposal, only the participant identifier of the generation trader is recorded. This contrasts with the existing trader event which allows a much greater quantity of information to be associated with the trader on an ICP, although much of this is not going to be relevant for a generation trader (e.g. ANZSIC code).

   However, it does leave an open question of what will happen should more information need to be associated with a generation trader in the future. Either, more non-metering information will need to be associated with the metering event, or a restructure would need to be made to separate this information into a different event. The latter option would be a significant change, especially as processes and systems would have already been developed with the current proposed structure.

4. **The Authority should work with the Registry Manager to ensure there are suitable testing process available.**
   Under the current MTR proposals, all MEPs and distributors will need to support MTR, however no retailers will need to develop support at this stage. This results in significant difficulties during the development process for MEP and distributor software vendors.

   As MTR needs to be initiated by traders, MEPs and distributors have no way to unilaterally mark an ICP as being subject to MTR or to assign a generation trader. This means it is not simple for distributors and MEPs to adequately test their systems in the UAT Registry prior to the implementation of MTR. Rather, distributors and MEPs will either must wait for a trader to do MTR on one of their ICPs in production (and then rapidly validate functionality before a billing cycle, for example) or they will have to find a trader that is both planning on participating in MTR and that is willing to initiate MTR on some ICPs in the UAT Registry for testing purposes.

We have also developed some possible solutions for these concerns that we think the Authority should consider:

1. **Implement a new 'MTR' event type for ICPs with MTR.**
   We believe the Registry should have a new event type dedicated to MTR. This will only be present on ICPs that are subject to MTR and will contain the MTR flag, an event date, the participant identifier of the generation trader and which meter channel it is associated with. We believe this has several key advantages over adding it to the metering event:

   a. It retains the existing separation between events, meaning that metering event changes will continue to only reflect changes to metering and that MTR events can track changes in the generation trader more clearly.

   b. It means the Registry's existing mechanisms for excluding events can continue to be utilised (e.g. the event type parameters in the PR-030 report). This would avoid a key pain point with the DER transition where we must support two different versions of several Registry reports.

   c. It will allow the MTR concept to be more readily expanded in the future if there is appetite for that.

2. **Allow MEPs and distributors to unilaterally create test MTR scenarios in the UAT Registry.**
   Our view is that the Registry should implement functionality to allow MEPs and distributors to assign generation traders to ICPs within the UAT Registry.

   We think that this is preferable over either requesting retailers set up MTR ICPs (due to the cumbersome process involved in that, along with the high likelihood of differing implementation timelines), or that the existing 'training data' functionality be adapted (as assigned MTR to actual ICPs means that real billing scenarios can be testing, rather than more contrived examples with training data ICPs).

Finally, we also agree with the Authority's assessment that the 18-month implementation timeline could be shortened under this new proposal as it is significantly less complex than the original structure.

Please do not hesitate to contact us if you have any questions about our submission.

Yours sincerely,

Jim Dowling

Founder & CEO, Digital Stock