

# COMMISSION CHANGE PROPOSAL

Form  
version 2.1

Change Proposal reference  
(To be completed by the TP Sec.)

**MCCP183-CC**

Version No.

**D.1**

## PART A — SUBMISSION

### A.1. GENERAL DETAILS

A.1.a. TITLE

Gap Site Letters

A.1.b. CONTACT  
NAME

David Walters

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TEL./MOB.

David.walters@watercommission.co.uk  
01786 430230

A.1.c. ASSOCIATED  
DOCS.

N/A

### A.2. MCCP / OCCP DETAILS

#### A.2.a. ISSUE OR DEFECT WHICH THIS MCCP / OCCP SEEKS TO ADDRESS

We have recently received a number of complaints regarding the letter sent by Scottish Water to Gap Sites identified by Scottish Water. The complaints, from both Licensed Providers and customers, claim that customers often do not receive the Gap Site letter. We have been told that this creates problems for Licensed Providers, particularly smaller ones with less name recognition, when they first contact the customer following the allocation process as they have to explain topics normally covered in the letter from Scottish Water, such as why the customer is being told it has to start paying and how the customer ended up with that particular Licensed Provider.

In these cases, Licensed Providers also often have to discuss with customers as to why the customers believe that they did not receive Scottish Water's letter. As Licensed Providers do not have visibility of the lettering process, they do not have the information necessary to have an informed discussion with these customers.

In order to address this, we will be requiring Scottish Water to send to the allocated Licensed Provider a copy of the letter sent to the Gap Site. It is our understanding that Scottish Water sends the letters via recorded or tracked post. In cases where Scottish Water does so, it will also be required to provide the reference number to the allocated Licensed Provider.

These changes will enable Licensed Providers to tell customers where the letter was sent, when it was sent, when the customer received it and, depending on the tracking method, who received the letter. Licensed Providers will also be able to send copies of the letters to customers should the customers still claim they did not receive the letters. These changes should also increase Licensed Providers' confidence that Scottish Water is sending the letter in all cases.

The method of how Scottish Water will send copies of the letter to Licensed Providers under 5.4.11 (iv)h is not being specified to allow Scottish Water and Licensed Providers to agree a format. It is also to allow for the flexibility for this format to evolve over time.

A.2.b. DRAFT LEGAL TEXT  
Required under Market Code Parts 8.7.1 (ii) (d) and 8.8.1 (ii) (d)

**5.4.11 Gap Site Allocation Process**

- (iii) For the purpose of allocating customers at Gap Sites, the following provisions apply:
- (a) Scottish Water will write to the non-household customer at the relevant Eligible Premises (using the form approved by the Commission) informing them that they must now choose a Licensed Provider within 15 Business Days or have one allocated to them. Scottish Water will also give each customer a unique reference number. **Scottish Water may mail the letter using a recorded or tracked method of delivery. Scottish Water will record any reference number associated with such delivery methods should one be available.**
- (iv) For the purpose of allocating customers at Gap Sites in accordance with Section 5.4.11 (iii) the following provisions apply:
- (f) Having allocated a Licensed Provider to the customer in accordance with Section 5.4.11 (iv) (a) above, the CMA will then register the new Supply Point(s) in accordance with Section 3.2.1 of CSD 0101 (Registration: New Connections & New Supply Points).
  - (g) Once the CMA has allocated a Licensed Provider to the non- household customer in accordance with Section 5.4.11(iv)(a) above, the Licensed Provider must write to that new customer within 5 Business Days of receiving notification of allocation from the CMA in accordance with Step c of Section 3.2.1 of CSD 0101 (Registration: New Connections & New Supply Points).
  - (h) **Within 3 Business Days of completion of Step c of Section 3.2.1 of CSD 0101, Scottish Water will send the Licensed Provider a copy of the letter sent to the Eligible Premise under Section 5.4.11 (iii) (a). Scottish Water will also send any relevant tracking reference numbers which are available.**

**A.3. IMPLEMENTATION DETAILS**

**A.3.a. TP ACTION REQUIRED**

NONE

**A.3.b. REQUIRED IMPLEMENTATION DATE**

Next version of the Market Code

**A.3.c. ANY LIMITATIONS OR DEPENDENCIES FOR IMPLEMENTATION**

**A.4. ANY OTHER COMMENTS**

## PART B — IMPLEMENTATION

B.1. IMPLEMENTATION DATE	2015-09-24
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B.2. IMPLEMENTATION DETAILS (MC version, CSD versions, CMA Central Systems release number, etc.)	
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Market Code v29