

Market Code Schedule 6

Code Subsidiary Document No. 0001

Market Training and Assurance  
Strategy for the Water Market in  
Scotland

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## Change History

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1.0	Aug 2007	Errata and clarification		
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# Table of Contents

<b>1. Introduction</b>	<b>4</b>
1.1 Purpose and Scope of the Market Training & Assurance Strategy	4
<b>2. Training Process</b>	<b>7</b>
2.1 Introduction	7
2.2 Training	7
2.3 Self-certification	7
2.4 Transition to a High Volume Interface	8
2.5 Approved Changes to the Market Code and changes to the Central Systems	8
2.6 Governance	8
<b>3. Principles and Methodologies Used in the Market Assurance Process</b>	<b>9</b>
3.1 Introduction	9
3.2 Principles	9
3.3 Techniques	10
<b>4. Market Assurance Process</b>	<b>15</b>
4.1 Licensed Providers wishing to begin using the High Volume Interface	15
4.2 Licensed Providers wishing to offer a new Service Category	15
4.3 Approved Changes to the Market Code or Central Systems	15
4.4 Re-Assurance for Existing Trading Parties using a High Volume Interface	17
4.5 <b>Governance</b>	19
<b>5. Reporting</b>	<b>20</b>
5.1 General Updates	20
5.2 Party-specific reports	20
<b>Annex A CMA Market Training/Assurance Application</b>	<b>21</b>
<b>Annex B Self-Certification Form</b>	<b>22</b>

# 1. Introduction

## 1.1 Purpose and Scope of the Market Training & Assurance Strategy

### 1.1.1 Introduction

This document describes the market training & assurance strategy that the CMA will administer for the purposes of the Market Code. The market training & assurance strategy comprises:

- The submission to the CMA of a market training/assurance application using the form in 0.
- The Training Process set out in Section 2 for all Licensed Providers; and
- The Market Assurance Process set out in Section 4 for Licensed Providers wishing to operate a High Volume Interface.

### 1.1.2 Low Volume Interface and High Volume Interface

The Central Systems offer both a Low Volume Interface and a High Volume Interface. All Trading Parties are required to be able to use the Low Volume Interface. Scottish Water also uses a High Volume Interface and Licensed Providers may choose to use a High Volume Interface. The Low Volume Interface allows Trading Parties to create Data Transactions by entering data into screen-based forms individually. A High Volume Interface allows pre-constructed Data Transactions to be submitted to the CMA by the Trading Party. Trading Parties may choose to use a High Volume Interface if they consider it is appropriate to their proposed market volume. Trading Parties may choose to operate high frequency transactions via a High Volume Interface and low frequency transactions via the Low Volume Interface.

Licensed Providers that operate a High Volume Interface have a potential to disrupt other Trading Parties with one error being replicated numerous times. Licensed Providers that operate using only the Low Volume Interface pose a reduced risk to other Trading Parties as a result of the following characteristics:

- Their level of activity is low or isolated; and
- Their inter-operation requirements with the CMA are limited.

Therefore, the Market Assurance Process set out in Section 4 applies to Scottish Water and to any Licensed Provider operating a High Volume Interface but not to a Licensed Provider operating using only the Low Volume Interface. All Licensed Providers will be required to complete the Training Process in accordance with Section 2.

### 1.1.3 Requirements on Licensed Providers

Each Licensed Provider will be required to successfully complete the Training Process and/or Market Assurance Process (as appropriate) for each Service Category for which it obtains (or expects to obtain) a Licence. Each Licensed Provider will be required to demonstrate or self-certify (as appropriate) its capability to comply with all Market Code obligations relevant to the Service Category for which it obtains a Licence.

Each Licensed Provider will be required to complete the Training Process before it will be permitted under Section 5.2.2 of the Market Code to Register Supply Points in the Supply Point Register. Where an Approved Change to the Market Code or any change to the Central Systems has a material effect on the Low Volume Interface, the CMA may require Licensed Providers to undertake additional training in accordance with the Training Process set out in Section 2.

Each Licensed Provider operating a High Volume Interface will be required to successfully complete the Market Assurance Process:-

1. before the Licensed Provider will be permitted to Register Supply Points in the Supply Point Register using the High Volume Interface in relation to either or both Water Services and Sewerage Services as appropriate;
2. where an Approved Change to the Market Code or any change to the Central Systems has a material effect on either Data Transactions or other interactions between the CMA and that Licensed Provider; and
3. where there is a change to the Licensed Provider's systems or processes which has a material effect on either Data Transactions or other interactions between the CMA and the Licensed Provider.

### 1.1.4 Requirements on Scottish Water

Scottish Water will be required to successfully complete the Market Assurance Process:-

1. where an Approved Change to the Market Code or any changes to the Central Systems has a material effect on Data Transactions or other interactions between the CMA and Scottish Water; and
2. where there is a change to Scottish Water's systems or processes which has a material effect on Data Transactions or other interactions between the CMA and Scottish Water

### 1.1.5 Requirements on the CMA

The CMA will also administer the Market Assurance Process in relation to one or more Trading Parties which operate a High Volume Interface where:-

- (i) required by the Market Auditor;
- (ii) necessary to help resolve a Dispute;
- (iii) required by the Expert; and
- (iv) required in relation to a Trading Party who is persistently failing Performance Standards.

The CMA will administer the Market Assurance Process in order to provide confidence to Trading Parties that the risk of disruption arising from the situations described above has been appropriately mitigated.

## 2. Training Process

### 2.1 Introduction

This section presents the Training Process that a Licensed Provider must complete for the purposes of Registering Supply Points pursuant to Section 5.2.2 of the Market Code.

### 2.2 Training

The CMA will offer 3 days of free training on the use of the Low Volume Interface to each Licensed Provider planning to enter the market. The CMA will schedule this training within 10 business days if possible, and in any event within 20 business days, of receiving the form at Annex A from the Licensed Provider. The first two days of training are a pre-requisite for self-certification (see Section 0). The third day of training may take place when the Licensed Provider first wishes to Register Supply Points in the live system. A Licensed Provider may purchase additional training from the CMA if required.

The training will comprise a series of modules, from which the Licensed Provider may choose those that are relevant depending on the activities the Licensed Provider plans to undertake. Training modules will set the training in the context of the Licensed Provider's wider obligations under the Market Code and Code Subsidiary Documents, as well as the wider market framework. Training is offered on the assumption that the Licensed Provider is familiar with these obligations and has read the relevant codes and documents.

Broadly the curriculum for the training will include:

- Presentation of the market structure, the Market Code and Code Subsidiary Documents;
- Scenario testing;
- Completion and signature of self-certification; and
- Registration of real customers on the live service with expert oversight. This last element (the third day in the training schedule) occurs at the time that the Licensed Provider is first ready to Register Supply Points in the live system.

### 2.3 Self-certification

A Licensed Provider must certify its readiness to participate in the market using the Low Volume Interface before it may be considered to have completed the Training Process for the purposes of Registering Supply Points pursuant to Section 5.2.2 of the Market Code. The licensed provider may self-certify after having received the first two days of the training provided under Section 0.

To complete self-certification, the Licensed Provider must sign the declaration at 0 that it can use the Low Volume Interface, that it understands the processes set out in the Market Code and Code Subsidiary Documents and that it understands its responsibilities under the market framework. The Licensed Provider must give the signed declaration to the CMA. The Commission, the CMA and any of their agents will not be held responsible for any difficulty that a Licensed Provider encounters using the Low Volume Interface having certified its readiness to participate in the market.

## 2.4 Transition to a High Volume Interface

A Licensed Provider that has completed the Training Process and subsequently wishes to use a High Volume Interface will be required to complete the Assurance Process described in Section 0. A Licensed Provider may commence the Assurance Process at any time after completion of the Training Process.

## 2.5 Approved Changes to the Market Code and changes to the Central Systems

Where an Approved Change to the Market Code or a change to the Central Systems impacts on the Low Volume Interface, it may be necessary for Licensed Providers to undertake additional training. Whether the change is sufficiently material to warrant such training shall be for the CMA Board to decide. Trivial changes do not require additional training.

The CMA shall provide the additional training according to a schedule that allows each Licensed Provider to complete the additional training within a reasonable time of the Approved Change taking effect. The CMA will bear the cost of the additional training.

If a Licensed Provider fails to complete the additional training within the schedule set out for that training by the CMA, that Licensed Provider will be taken not to have completed the Training Process for the purposes of Registering Supply Points pursuant to Section 5.2.2 of the Market Code.

A Licensed Provider may, at any time, regain its status of having completed the Training Process for the purpose of Registering Supply Points pursuant to Section 5.2.2 of the Market Code, by completing the additional training.

## 2.6 Governance

On completion of the Training Process by a Licensed Provider the CMA will update the Central System to reflect the fact that the Licensed Provider has completed the Training Process for the purposes of Registering Supply Points pursuant to Section 5.2.2 of the Market Code.

## 3. Principles and Methodologies Used in the Market Assurance Process

### 3.1 Introduction

This section sets out the main market assurance techniques that the CMA will use to administer the Market Assurance Process for Scottish Water and any Licensed Provider operating the High Volume Interface.

### 3.2 Principles

The CMA shall apply the following principles in administering the Market Assurance Process for a Trading Party wishing to use a High Volume Interface.

#### **Pragmatic**

The assurance must not place an unnecessary burden on the Trading Party. This will be achieved by evaluating the risk presented by the Trading Party and by the CMA applying the Market Assurance Process appropriately.

#### **Impact**

Approved Changes to the Market Code and changes to a Trading Party's own systems will result in varying degrees of impact to the Trading Party or on other Trading Parties. The CMA will use the Market Assurance Process to assess the risk for the introduction of such changes and will perform assurance appropriate to the associated risk.

#### **Proportional**

The Market Assurance Process will use the review of the Trading Party's project process to determine the extent of assurance a Trading Party will have to execute. This approach includes an obligation on the Trading Parties to revert to the CMA when a change has been made to the Licensed Provider's system or processes, or on a change to Scottish Water's systems or processes, or on a change to the Central Systems or Market Code.

#### **Evidence**

Site-based work will be kept to a minimum consistent with maintaining a satisfactory level of assurance. Site visits may be conducted by or on behalf of the CMA initially to establish agreement regarding the quality, quantity and timing of evidence to be provided by the Trading Party. Subsequent requests for evidence can be submitted to the CMA for off-site auditing where practicable.

## Service

The Licensed Provider will be required to complete the Market Assurance Process for the Services it has declared on its Licence application. The Services may be:

- Water Services;
- Sewerage Services; or
- Both Water and Sewerage Services

Licensed Providers who start with one Service (e.g. Water) may choose to apply for a Licence for the other (i.e. Sewerage). Where such a Licence is granted, the Licensed Provider will be required to undertake appropriate additional assurance for the new Service.

## 3.3 Techniques

### Review of the Licensed Provider's Project

This review process will be carried out for all new market entrant Licensed Providers at the start of the Market Assurance Process. The Licensed Provider will provide a report to the CMA setting out their intended systems, business processes and staffing levels. The Licensed Provider will also confirm that they understand the Market Assurance Process and are aware of and will comply with the Market Code. This report will assist the CMA in determining an appropriately scaled assurance program.

### Self-Assessment Questionnaire and Configuration Management Return

The CMA provides two key documents to support the assurance techniques – the Self-Assessment Questionnaire and Configuration Management Return. These are in the form of a textual document and multi-worksheet spreadsheet respectively.

The Trading Party is required to complete these in sections and return them to the CMA in advance of the corresponding assurance stage to provide a basis for the assessment to be carried out. Some sections of the questionnaire must be signed by a Director, Chief Executive or by a person who otherwise has a suitable level of authority.

The completed documents inform the CMA on how the Trading Party has organised its readiness for market operation and details of where, within their processes and systems, Market Code and Subsidiary Documents are met.

Typical questions will refer to the Service Category the Trading Party is going to operate in; the systems that the Trading Party will use; business processes and supporting documentation; organisational charts; anticipated customer volumes; anticipated wholesale volumes; mapping of Code Subsidiary Documents to business processes and systems designs.

## Business Solution Assessment

The CMA will carry out the Business Solution Assessment to seek assurance that the Trading Party's systems and processes are designed and built in such a way that the Trading Party will meet the obligations of the Market Code. The Trading Party should schedule the Business Solution Assessment with the CMA as early as is possible so that any revisions, arising from the assessment, can be incorporated prior to their system build/procurement. The Business Solution Assessment also looks at other areas such as management procedures.

The CMA will provide the Trading Party with a questionnaire and checklist of requirements for their completion and return to the CMA. They will also be required to supply formal design and process documents that demonstrate their plans for compliance with the Market Code. An assessment of the information provided will then be carried out by or on behalf of the CMA. There will be an initial assessment of documentary evidence at the CMA's offices. This may be followed by a site visit to gain a clearer understanding of the Trading Party's design.

Key areas of assessment will include:

- Compliance with the Market Code
- Systems architecture
- System functionality vs. business procedures
- Coherence of procedures and systems
- Transaction processing and validation
- Change and configuration management
- Test planning and management
- Problem management

The Business Solution Assessment will include constructive question and answer sessions and "walkthrough" exercises to determine whether the Trading Party has a comprehensive and consistent set of systems and processes and an effective change control method to manage them.

Any issues identified will be formally documented and the Trading Party will be expected to propose and agree corrective actions. The results of the actions are then verified by the CMA. An outcome report will be produced on completion of the Business Solution Assessment and thereafter updated on completion of the corrective actions. These reports will be treated as confidential and sent to the CMA Board informing them of the progress of the Trading Party in the Market Assurance Process.

## **Integration Test Assessment**

Internal testing by each Trading Party will be required to ensure compliance with the Market Code. The CMA will require to be satisfied that the Trading Party has carried out system testing, user acceptance testing and integrated tests that cover all of the Market Code functions.

Integration Test Assessment will be performed by the CMA after completion of the Trading Party's internal testing to verify that the Trading Party has carried out satisfactory testing of its systems and processes and remedied any problems arising from this testing and has re-tested accordingly.

A Trading Party will be required to complete and return a questionnaire and checklist to the CMA. The checklist will assist in identifying the current baseline of the Trading Party's system, documents and project schedule. After receipt of this information the Integration Test Assessment will proceed. The CMA will execute the Integration Test Assessment at the premises of the Trading Party if it considers this appropriate. The assessment will seek to verify coverage of the design, test execution and test reviews. Two main types of test will generally be performed:

- End-to-end integration testing based on realistic business scenarios; and
- Market interface testing including Data Transaction generation, despatch, receipt, validation, routing and rejection.

Issues, follow-up and reporting will be documented and dealt with as for the Business Solution Assessment.

## **Data Transaction Capability Testing**

The purpose of Data Transaction Capability Testing is to gain assurance that the Trading Party will be able to send and receive Data Transactions to and from the Central Systems correctly.

Data Transaction Capability Testing is a precursor for Market Scenario Testing and the CMA will use the Central Systems to carry this out.

The CMA will test the communications interface from the Trading Party's systems to the CMA as well as the reverse path from the CMA. Data Transaction Capability Testing does not test business process or subsequent processing of Data Transactions by the Trading Party's systems.

The CMA will construct the Trading Party's Data Transactions in accordance with the Data Transaction Catalogue. Issues, follow-up and reporting will be documented and dealt with in the same manner as in the Business Solution Assessment.

All Licensed Providers wishing to use a High Volume Interface will be required to carry out Data Transaction Capability Testing but it may also be appropriate for Trading Parties in other cases (e.g. change to Central Systems, change of IP address).

Verification will be by documentary evidence that the Trading Party will be required to provide. Issues, follow-up and reporting will be documented and dealt with as for the Business Solution Assessment.

### **Market Scenario Testing**

Market Scenario Testing will be carried out to obtain assurance that the Trading Party is able to carry out key scenarios that it will typically encounter using its declared systems, business processes and operational staff within normal, operational conditions including market timescales.

Typical scenarios will include, but are not limited to:

- New Supply Point;
- Transfer Registration (both gain and loss);
- Transfer Registration (Cancel Transfer);
- Add Meter;
- Remove Meter;
- Disconnection;
- Meter Change and
- Regular Meter Reading

The market processes are set out in the Code Subsidiary Documents.

The scenarios will be defined in the form of storyboards. This technique will use a central test service, provided by the CMA. Planning and co-ordination will be essential for managing:

- The schedule for testing, including any re-tests;
- Test data; and
- Problem processing.

Trading Parties will run the tests and will be required to produce appropriate evidence of each test step to support the test outcomes. This will include, but is not limited to, prints of Data Transactions both sent and received, prints of relevant screenshots, reports, file and relevant database prints. Where appropriate the CMA will collect evidence received from and sent to the Trading Party during testing.

It is the responsibility of the Trading Party to create their own test scripts for the scenarios, customised to their systems and procedures. The Trading Party will collect evidence and forward it to the CMA on a step-by-step basis. The CMA will assess the evidence as it is

received and compare it with expected results. Any discrepancies will be reported by the CMA to the Trading Party.

Trading Parties will be required to re-run any tests that have failed. The CMA will, where practicable, discuss re-run options with the Trading Party in order to find a pragmatic way forward (e.g. partly re-run). Issues, follow-up and reporting will be documented and dealt with in the same manner as described in the Business Solution Assessment.

On successful completion of the tests (as determined by the CMA), the Trading Party will be required to confirm, by providing a signed declaration to the CMA, that it has successfully tested all of the systems that it intends to use for its Market Operations. The Trading Party's declaration will include an acknowledgement that it will undertake further assurance if it makes changes to its systems or processes in accordance with the Market Code. Dependent upon the significance of any recommended change by the CMA further test evidence may be necessary.

## 4. Market Assurance Process

### 4.1 Licensed Providers wishing to begin using the High Volume Interface

In accordance with Section 2.4, the CMA will carry out the Market Assurance Process for a new or existing Licensed Provider which wishes to start Registering Supply Points under the Market Code using a High Volume Interface.

The assurance approach comprises all of the techniques described in Section 3. The scope will be limited to the Service Categories that the Licensed Provider intends to supply.

### 4.2 Licensed Providers wishing to offer a new Service Category

The Market Assurance Process will cater for Licensed Providers which are currently using a High Volume Interface and wish to offer another Service Category, for example a Licensed Provider currently using the High Volume Interface only for Water Services will be required to complete the Market Assurance Process for Sewerage Services.

The assurance approach comprises all of the techniques described in Section 3. The scope will be limited to the additional service category that the Licensed Provider now intends to supply.

### 4.3 Approved Changes to the Market Code or Central Systems

Approved Changes to the Market Code will be issued by the CMA periodically and these may or may not also give rise to Central Systems changes. Licensed Providers and Scottish Water must take appropriate measures to ensure that they have a change control process in place to manage this. For the following reasons, the CMA may require a Licensed Provider or Scottish Water to undertake elements of the Assurance Process described in Section 3 in response to relevant Approved Changes:

The nature of the changes and their potential impact on Licensed Providers and Scottish Water will vary with each update to the Market Code. In particular, where any Data

- Transaction structure is to be changed there will be a direct impact on all Licensed Providers and Scottish Water that needs to be carefully planned by the CMA; and
- Scottish Water and most of the Licensed Providers (brand new entrants may be an exception) involved will be experienced in operating under the Market Code.

The CMA will carry out a “due diligence” check that Scottish Water and relevant Licensed Providers have taken reasonable steps to ensure continued compliance with the Market Code. These steps will include (but not be limited to), impact assessment, procedural and software updates, testing of these, plans for implementation, and contingency for a failed implementation etc., as appropriate. It will be the responsibility of Scottish Water and the relevant Licensed Providers to implement their own change management processes, with the CMA ensuring these are satisfactory.

In some cases, especially where a change to the Data Transaction Catalogue is to occur, Data Transaction Capability Testing and/or Market Scenario Testing may be necessary.

The same approach will also be applied by the CMA to provide assurance on changes made to Central Systems, for example data aggregation and settlement. However this will be based on the nature, scope and complexity of the change.

The table below illustrates the general relationship between the nature of change and the necessary assurance. It is stressed that these are examples for illustration only.

Examples of Change	Typical Impact on Market Assurance required			
	Assurance required by CMA	Exchange of test Data Transactions	DTCT	MST
Change to DTC: new Data Transaction	Yes	Yes	Yes	Yes
Change to DTC: new field on existing Data Transaction implemented by CMA	Yes	Yes	Yes	Likely
Change to DTC: new field on existing Data Transaction implemented by Trading Party	Yes	Yes	Yes	Likely
Data Aggregation or Settlement	Yes	Unlikely	Unlikely	Unlikely

*Table 1- Illustration of change assurance requirements*

## 4.4 Re-Assurance for Existing Trading Parties using a High Volume Interface

The procedures and systems used by Trading Parties to operate under the Market Code will be subject to change. This could be as a consequence of an Approved Change to the Market Code described in Section 4.3 or otherwise. Where such a change impacts on their ability to operate with the Central Systems using a High Volume Interface, the CMA will require that the Trading Party carries out some level of assurance to confirm that the change has been managed in such a way that the risk to other Trading Parties has been minimised. This assurance process is known as re-assurance.

The method is consistent with that described for the Approved Changes to the Market Code. The CMA will check that the Trading Party has carried out an impact assessment for the change, designed the change(s) and subjected it to independent internal review, implemented and tested it and planned for its introduction into the live market. Market Scenario Testing will be supported by the CMA, and will be scheduled by agreement between the CMA and the Trading Party.

The table overleaf illustrates some typical changes that may arise. It also shows the likelihood of an impact on a Trading Party's ability to continue to comply with their Market Code obligations and therefore the likelihood that assurance by the CMA will be required. It is *stressed* that these are only examples and are intended to assist Trading Parties in their own assessment of whether change that they are intending to make is likely to require a re-assurance.

	<b>Typical Impact on market obligations and likelihood that Market Assurance Process is required</b>		
<b>Examples of Change</b>	<b>Not Likely</b>	<b>Possibly</b>	<b>Very Likely</b>
<b>System Change</b>	Change to non industry-facing system (e.g. pure billing system)	Significant change to industry-facing system	
		Replacement of industry-facing system with established, proven system	Replacement of industry-facing system with a new, unproven system
		Change to user interface	
	Bulk migration of industry data using industry processes		Bulk migration of industry data but not using industry processes
<b>Process Change</b>	Process updates for improvement of accuracy and clarity	Manual process replaced by automated process (industry-facing)	Multiple manual processes replaced by automated processes (industry-facing)
	Minor process change to reflect changing reporting structure or internal company policy		Major rewrite of process
<b>Staff Change</b>	Routine staff changes and associated intra-company re-organisations	Staff changes due to acquisition of new company	Relocation requiring total staff replacement

*Table 2- Illustration of re-qualification assurance requirements (examples)*

## 4.5 Governance

### 4.5.1 Completion of Assurance Processes

The CMA Board will certify a Trading Party's completion of the Market Assurance Process as a whole.

When a Licensed Provider completes the Market Assurance Process the CMA will update the Central System to reflect the fact that the Licensed Provider has completed the Market Assurance Process for the purposes of Registering Supply Points under the Market Code using the High Volume Interface.

### 4.5.2 Entry and Exit Phases

The CMA will conduct the review process for Trading Parties' commencement and completion of phases of the Market Assurance Process.

On completion of a phase of the Market Assurance Process, a Trading Party may commence the next phase after agreeing a schedule for that phase with the CMA.

Completion of a phase of the Market Assurance Process may be subject to conditions set by the CMA Board. The Trading Party will provide to the CMA Board any reasonable information required to monitor compliance with such conditions and in order to determine when the conditions may be lifted.

Any confirmation of completion given by the CMA is limited to the Service Category or change related scenario for which the Market Assurance Process has been successfully completed.

## 5. Reporting

### 5.1 General Updates

General updates on activity under the Training Process and the Market Assurance Process will be provided to the CMA Board by the CEO. These reports will focus on:

- Scale of activity with respect to new Licensed Providers, existing Licensed Providers' assurance or training for a new Service Category and material changes being made to Licensed Providers' systems (for those Licensed Providers using the High Volume Interface);
- Scale of activity with respect to Scottish Water's assurance for material changes being made to Scottish Water's systems;
- Training schedules, assurance plans, progress and status report for Market Code Approved Changes; and
- Plans and progress for changes to the Training Process and Market Assurance Process.

### 5.2 Party-specific reports

The CMA Board will be kept informed of the progress being made by each new Licensed Provider, existing Licensed Providers and Scottish Water undertaking the Training Process or the Market Assurance Process. In particular the CEO will provide the CMA Board with a copy of the detailed stage reports required by it in order that it may:

- Be kept informed of the progress of all Trading Parties undertaking the Market Assurance Process for the High Volume Interface; or
- Make an informed go/no-go decision on "cut-over" for any change to the Central Systems.

Copies of the detailed phase reports will be given to the Trading Party. The Trading Party will have the opportunity to add comments on the report prior to its issue to the CMA Board.

## Annex A CMA Market Training/Assurance Application

Company name:			
Name:			
Title/Position:			
Address:			
Tel:		<b>Fax:</b>	
Email:			
Date:			

I confirm that it is our intention to operate in the Water Market in Scotland in the following Licensed Provider Role(s)

Please indicate the communications method(s) by ✓ the boxes below		Please indicate types of provision by ✓ the boxes below	
	Low Volume Interface (Training Process applies)		Water Supply
	High Volume Interface (Assurance Process applies)		Sewerage Supply
			Trade Effluent
			Self Supply

Please provide as much of the following as you are able:

Target date for registration of first supply point.	
How critical is this date to your business?	
Preferred dates for CMA training on Low Volume Interface	
<b>If operating High Volume Interface:</b> Date expected to be ready to start CMA Assurance.	

Signed: ..... Position: ..... Date:

Please e-mail this application to: [enquiries@cmascotland.co.uk](mailto:enquiries@cmascotland.co.uk), or sign and Fax to: 01786 468 868 or post to: The Central Market Agency, Enterprise House, Springkerse Business Park, Stirling, FK7 7UFTel: 01786 468 860. The CMA will respond within three working days.

## Annex B Self-Certification Form

On behalf of ..... ("the Licensed Provider"), I declare that the Licensed Provider:

- Understands its obligations under the Market Code, Code Subsidiary Documents and the market framework generally;
- Acknowledges that the Licensed Provider is bound by the Performance Standards and is liable for Performance Standard Charges in accordance with the Market Code;
- Has undertaken training provided by the Central Market Agency on the operation of the Low Volume Interface; and
- Can operate the Low Volume Interface for the Central Systems;
- Acknowledges that the Commission, the Central Market Agency and any of their agents will not be held responsible for any difficulty that the Licensed Provider may encounter using the Low Volume Interface.

This declaration relates to water services/sewerage services/both water and sewerage services [delete as appropriate].

Signed on behalf of the Licensed Provider by:

..... (sign name)

..... (print name)

Position: .....

at: ..... (Time)

on: ..... (Date)

before this witness:

Signature: .....

Name: .....

Address: .....

.....

.....