

MARKET CODE / OPERATIONAL CODE CHANGE PROPOSAL

Form
version 2.1

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

MCCP131

Version No.

D.1

PART A — SUBMISSION

A.1. GENERAL DETAILS

A.1.a. TITLE Provision of information to Scottish Water

A.1.b. COMPANY Scottish Water

Change Proposals must be authorised by the person designated by the signatory to the Market Code Framework / Accession Agreement

A.1.c. AUTHORISED SIGNATURE Jessie McLeman NAME Jessie McLeman

A.1.d. CONTACT NAME Jessie McLeman CONTACT EMAIL; TEL./MOB. Jessie.mcleman@scottishwater.co.uk 07875 872123

A.1.e. ASSOCIATED MCCP / OCCP

A.1.f. ASSOCIATED DOCS.

A.1.g. PROPOSED URGENCY URGENT / NON-URGENT

A.1.h. REASONS FOR URGENCY

The CMA CEO will review this information and make a decision as to whether to take this MCCP / OCCP forward as urgent as defined under Market Code Part 8.9.1

A.2. MCCP / OCCP DETAILS

A.2.a. ISSUE OR DEFECT WHICH THIS MCCP / OCCP SEEKS TO ADDRESS Required under Market Code Parts 8.7.1 (ii) (b) and 8.8.1 (ii) (b)

Background to issue with current arrangements

Under current market arrangements, Scottish Water does not receive from the CMA a notification of the Licensed Provider registered to a supply point or notification of the identity of the customer at the supply point. There is a query facility available via the Low Volume Interface which allows a Scottish Water user to know the identity of the Licensed Provider registered at a supply point, with the option of interrogating up to 100 supply points in one query. The identity of the customer is not available through the LVI. The CMA systems are supported during business hours, ie Monday to Friday 08.00 until 18.00 and while the systems are often available outside these times there is no obligation on the CMA for them to be so.

The background to these arrangements stem from Market Opening when it was thought inappropriate to provide such information to Scottish Water. In a more mature market, Scottish Water considers it is now timely to reconsider this approach. Indeed, in a multi-LP environment, these arrangements are increasingly causing operational difficulties.

Examples of the difficulties arising from the current arrangements are set out below.

Out of hours contacts. Scottish Water operates a stand-by arrangement should there be a need to escalate an issue affecting supplies at a particular location or locations. This typically relates to provision of water services or a public health matter. During working hours, where there is a need to establish the identity of the Licensed Provider at a particular SPID, Scottish Water will interrogate the LVI. Out of hours, Scottish Water has to phone round Licensed Providers to establish the identity of the Licensed Provider registered at a premises. If there is a general issue affecting all premises, they may all have to be contacted. However, if only one or two non-household supply points are affected, these arrangements become increasingly unwieldy, inefficient and potentially dangerous, and Licensed Providers will not want to be disturbed unnecessarily. A more focused arrangement is needed to allow Scottish Water to contact only the affected Licensed Providers in cases where immediate direct contact is required from Scottish Water to the Licensed Provider and hence the customer. Note: such contacts are not to replace the notification system on the portal.

Service requests. Service Requests from Licensed Providers are received at the Wholesale Service Desk. The principle is that the request comes from the Licensed Provider registered to the Supply Point. Scottish Water checks a small random sample to ensure the request comes from the registered Licensed Provider. However there have been cases where Scottish Water has been directed to the wrong address. The provision of information from the market about the identity of the Licensed Provider and customer at the Supply Point should assist in identifying such discrepancies in advance.

Data issues. Scottish Water on a regular basis addresses queries from Licensed Providers relating to data, and discussions can be protracted if several supply points are involved. Knowing the identity of the Licensed Provider and the customer at the premises should result in a more efficient and potentially more productive conversation. Looking ahead, it would be beneficial to have a more proactive approach to data quality management, involving discussions between Scottish Water and the relevant Licensed Provider. Scottish Water is looking to develop a number of internal measures for assessing data quality for its own data items and at an appropriate point would look to review those with each Licensed Provider.

Byelaws enforcement and access to data. The purpose of the Water Byelaws is to regulate the local pipework arrangements to protect the quality of water supplied to consumers at the premises and other users of the network. The current market arrangements cause particular challenges for byelaws monitoring and enforcement. Premises are inspected on a periodic basis, and the frequency of

visits depends on the activity carried out at the premises. The Byelaws inspectors plan their visits having established the activity at the premises from a combination of external sources, including external fieldwork. The inspectors try to identify the SPID from the customer name displayed at the premises and the address. Finding the SPID from the address alone can be difficult, particularly in multi-tenancy units where there can be complex divisions and numbering arrangements, often not displayed at the site. In many cases the customer name is the most useful reference point for the premises and knowing the identity of the customer at the premises will allow the risk assessment to be handled more efficiently and effectively. There can be other operational scenarios in seeking to link address back to SPID, where the identity of the customer would be very useful in making that relationship.

Scope for additional market functionality

If Scottish Water were provided with the identity of the Licensed Provider and the customer at the supply point, there are a number of areas of additional functionality that could be considered for the market as a whole. No assessment of the options has been undertaken so these possibilities are presented here as ideas and for reflection only. The options include a facility whereby Scottish Water's Licensed Provider Notification System is enhanced to allow Licensed Providers to query for their supply points and customers affected by an event. The current arrangement is that Scottish Water advises of the post codes affected by an event; the Licensed Provider has to download that to their own system to match post codes to their supply points and customers, which can take time. Another option which could be considered could be a notification to the Licensed Provider from Scottish Water when a customer calls in to the contact centre to report a public health issue; the notification would be provided to the relevant LP at the end of the call as part of the call wrap, assuming the caller is able to supply sufficient information to allow the premises to be identified.

In summary, given the number of Licensed Providers, and with the experience gained since the opening of the market, Scottish Water considers it is timely to allow it to be advised of the identity of the customer and the Licensed Provider at the supply point. Given the need for the information to be used for a number of purposes, including establishing contact for operational reasons, it is proposed that the information is made available both as a data flow and in certain reports. The current arrangements do not support the smooth running of certain activities as set out above. Were the additional information to be provided, there is scope for the development of additional functionality which may assist Licensed Providers and the operation of the market. Scottish Water continues to be responsible for compliance with its obligations and will review the risks associated with the provision of the additional information.

A.2.b. DESCRIPTION OF THE NATURE AND PURPOSE OF THE MCCP / OCCP AND HOW IT MEETS THE MARKET CODE / OPERATIONAL CODE OBJECTIVES AND PRINCIPLES FOR THE MARKET DOCUMENTS Required under Market Code Parts 8.7.1 (ii) (c) and 8.8.1 (ii) (c)

General Description

The nature of this MCCP is to amend the Market Code to provide two additional data items by data flow or flows to Scottish Water as and when these data items change at the CMA, namely the identity of the Licensed Provider registered at the supply point and the identity of the customer at the supply point. Please note that Scottish Water is not seeking information on transfer requests in advance of the transfer being effected.

Scottish Water is also proposing that the same information is provided in monthly reports, namely, that the identity of the Licensed Provider is provided in the Disaggregated Settlement Reports and the New and Partial Report; and that the identity of the customer is provided in the Market Data set.

The notification by transaction would require a new flow or flows. It is understood that the reports are

already produced by the CMA in that format. There may be a requirement for a one-off data load from the CMA, and that would need to be discussed.

It could be argued that some of the issues identified above by Scottish Water above could be addressed by the provision of reports only rather than by data flows. However, if additional functionality is to be considered for operational purposes, the information should come into corporate systems from data flows and needs to be current.

Principles and Objectives affected

PRINCIPLE	AFFECTED (Y/N)	DESCRIPTION
Proportionality	Y	
Transparency	Y	
Simplicity, Cost-effectiveness, and Security	Y	For operational reasons, the current arrangements are causing operational difficulties and these should be addressed through these measures as well as provide scope for other associated enhancements.
Non-exclusivity		
Barriers to Entry		
Customer Contact		
Non-discrimination		
Non-detrimental to SW Core Functions	Y	
MC / OC OBJECTIVES		

A.2.c. IMPACT

Required under Market Code Parts 8.7.1 (ii) (d), (f) and (g), and 8.8.1 (ii) (d) and (f)

CONFIGURED ITEM	IMPACTED (Y/N)	DESCRIPTION
MC / OC		As below
CSDs		As below
Wholesale Services Agreements		
Licenses		

CMA Central Systems		Yes
CMA business processes		
Trading Party systems		SW will need to develop its systems to hold the additional data items.
Trading party business processes		As above.

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

The following outline changes to the market texts are proposed. These will be refined following detailed discussions with the CMA, and detailed textual changes proposed accordingly;

Data flows

Regarding the identity of the Licensed Provider at the supply point, the proposal is for Scottish Water to be sent the transaction which is reciprocal to the T008.1 (Notify Registration Start Date) as sent to the new Licensed Provider on confirmation of transfer;

Regarding the identity of the customer, the proposal is for Scottish Water to be sent the transaction which is reciprocal to the T032.0 (Customer Name Updated) transaction, as and when that is created and updated.

Reports

Exposure of the LPID and Customer Name in Disaggregated Settlement Reports and in the New and Partial Report.

Exposure of the D4001 OrgID, D2027 Customer Name and D2005 Customer Classification (sensitive customers) in the Market Dataset report.

LVI

The proposal is that Scottish Water LVI access would be expanded to allow users to see details of LP and customer in the SPID details view.

A.3. IMPLEMENTATION DETAILS

A.3.a. PROPOSED IMPLEMENTATION DATE OR LEAD TIME
Timescale must not overlap with the period of consultation with the Commission and should take account of the impacts identified in Section A.2.c. Any quoted lead time should commence from date of Approval.

Will depend on outcome of assessments.

A.3.b. ANY LIMITATIONS OR DEPENDENCIES FOR IMPLEMENTATION

A.4. ANY OTHER COMMENTS

PART B — TP ASSESSMENT

B.1. ASSESSMENT PROCESS

B.1.a.	ASSESSMENT START DATE	yyyy-mm-dd	ASSESSMENT END DATE	yyyy-mm-dd
B.1.b.	IMPACT ASSESSMENT REQUIREMENT		IA REQUIRED / IA NOT REQUIRED	
B.1.c.	CONSULTATION REQUIREMENT		TP CONSULTATION REQUIRED / TP CONSULTATION NOT REQUIRED	
B.1.d.	ASSOCIATED DOCUMENTS (to this Part B)			

B.2. ASSESSMENT DETAILS

B.2.a. CHANGE SPECIFICATION AND IMPACT (if different from that originally submitted)

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B.2.b. DRAFT LEGAL TEXT (if different from that originally submitted)

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B.2.c. TP ASSESSMENT
Taking into account complexity, importance and urgency, and having regard to whether or not such proposal is within the relevant Objectives and Principles as required under Market Code Parts 8.7.1 (v) and 8.8.1 (iv)

Impact on Principles and Objectives (if different from that originally submitted)	
Cost Estimate	£18k (IA + 33%)
Benefit Estimate (L: < 10k, M: £10k to £100k, H: > £100k)	
B.3. TP DECISION	TP APPROVED
B.4. FINAL TP VIEWS	
B.5. PLANNED IMPLEMENTATION DATE	March 2014 Release

WITHDRAWN BY PROPOSER?	No
COMMENTS	
DATE OF WITHDRAWAL	

PART C — COMMISSION APPROVAL

C.1. DATE FINAL REPORT ISSUED TO COMMISSION	2013-09-05
C.2. APPROVAL STATUS	APPROVED CHANGE
C.3. DATE OF APPROVAL STATUS	2013-09-20
C.4. COMMISSION RESPONSE REFERENCE	

PART D — IMPLEMENTATION

D.1. IMPLEMENTATION DATE	2014-03-21
D.2. IMPLEMENTATION DETAILS (MC version, CSD versions, CMA Central Systems release number, etc.)	
CMA CS v3.7	