

OPERATIONAL CODE CHANGE PROPOSAL

Draft Form Version 1.2 (sections C & D from Form Version 1.7)

Operational Code Change Proposal Ref (Assigned by CMA)	OCCP 35	Version Number (Assigned by CMA)	Version C.1
Title of the change	Improving responses for verification of service visits – Form O		
1. GENERAL DETAILS	Proposers are reminded that Change Proposals must be countersigned by the Proposer's Contract Manager or the person designated by the signatory to the Market Code Framework /Accession Agreement		
Company:	Business Stream	Org ID if assigned:	
Signature:	James Bream	Date:	15/11/11
		Name:	James Bream
Contact details for the Proposal - the contact should be able to deal with queries regarding this Operational Code Change Proposal and need not be the same person who has countersigned the Change Proposal			
Name:	James Bream		
Email Address:	James.bream@business-stream.co.uk		
Telephone and or Mobile:	0131 338 3223		
Number of Associated Documents	00	Name or link to documents	FormOandOpsCode.doc
If the OCCP will also affect the Operational Code, an MCCP must also be raised			
Indicate if there is an associated MCCP		MCCP Ref: CMA use only	
URGENT – IF PROPOSER HAS INDICATED THIS OCCP IS URGENT, STATE REASONS HERE The CMA Chief Executive will review this information and make a decision as to whether to take this OCCP forward as urgent as defined as under Market Code Part 8.8.1 (ii) (e)			
The change is not urgent but should be implemented in a similar timescale to the recent form K operational changes.			
2. OPERATIONAL CODE CHANGE PROPOSAL DETAILS			
A	ISSUE or DEFECT WHICH THIS OPERATIONAL CODE CHANGE PROPOSAL SEEKS TO ADDRESS required under Market Code Part 8.8.1 (ii) (b)		

In spring of 2011 Scottish Water introduced a more consistent approach following visits arising from a Form K for metering verifications. This change was introduced following the completion of discussions at the Technical Panel. The change has generally seen a significant improvement in the quality of customer service which Scottish Water has delivered with limited impact on all market participants.

This experience has highlighted that there is room for further improvement for other operational activities which have a direct impact on customers. The focus of this paper is for responses which Licensed Providers receive following the completion of other Form O activities.

Verification of service operational activity has a significant impact on customers. Generally queries arise from a customer challenging charges relating to their supply, this in turn leads to a visit from Scottish Water. The response from Scottish Water varies significantly in quality and depth which can leave a Licensed Provider in a difficult position when trying to explain to a customer what activity was actually undertaken.

This proposal will help support conversations with customers without a major structural change to the market. In short the change will define what the 'findings of a site inspection' actually are and ensure all parties are protected. This process will also formalise information flows which currently happen on an ad-hoc basis.

B	DESCRIPTION OF NATURE AND PURPOSE OF THE CHANGE AND HOW IT MEETS THE OPERATIONAL CODE OBJECTIVES AND PRINCIPLES FOR THE MARKET DOCUMENTS required under Market Code Part 8.8.1 (ii) (c)
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The Proposer should indicate which principles the change supports and whether there is any adverse effect on any principle(s).

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|--|---|
| a) Proportionality | e) Barriers to entry |
| b) Transparency | f) Customer contact |
| c) Simplicity, cost-effectiveness and security | g) Non-discrimination |
| d) Non-exclusivity | h) Not detrimental to Scottish Water's core functions |

The change is designed to be fair to all parties in the market and address a failure which exists.

The change will not be detrimental to Scottish Water and will reduce administration associated with invoicing disputes. The changes will certainly benefit the functioning of the market with additional information being given to Licensed Providers which will in-turn help customer service.

The change should actually reduce barriers to entry by ensuring new and existing Licensed Providers are given the same service levels. The change is therefore non-exclusive. The change is simple to adopt, it is cheap to deliver and is proportional given the challenges faced in this area from challenging customers.

C	IMPACT – required under Market Code Part 8.8.1 (ii) (f)
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The Proposer should indicate the sections of the Market Code affected, whether the Operational Code or CSDs, Wholesale Services Agreement or License is impacted and whether there are likely to be implications on:

- | | |
|----------------------------|---------------------------------------|
| a) Central Systems | c) CMA Interfaces/ Processes |
| b) Trading Party's systems | d) Trading Party's business processes |

a) Central Systems – No impact

b) Trading Party's systems No impact, unless Scottish Water seek to store form responses to Licensed Providers

c) CMA Interfaces/ Processes – No impact

d) Trading Party's business processes – benefit to LP processes in terms of charging reconciliation and customer service. Minor impact for Scottish Water to formally record and provide data collected on site visit.

D	DRAFT LEGAL TEXT – required under Market Code Part 8.8.1 (ii) (d)
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See attached document

3. IMPLEMENTATION DETAILS - 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 C. Any quoted lead time should commence from date of approval.
The Implementation Date will be the date of the next release of the Operational Code following Approval by the Commission
4. ANY OTHER COMMENTS

The full text of the objectives and principles for the Operational Code are set out in The Water Services (Codes and Services) Directions 2007 which can be downloaded from the Commission's website (<http://www.watercommissioner.co.uk/Comp/ServiceDirections.asp>)

PART B –TP ASSESSMENT				
1. ASSESSMENT PROCESS				
a.	ASSESSMENT START DATE	20/10/11	ASSESSMENT END DATE	20/10/11
b.	IMPACT ASSESSMENT REQUIREMENT	IA NOT REQUIRED		
c.	CONSULTATION REQUIREMENT	TP CONSULTATION NOT REQUIRED		
d.	ASSOCIATED DOCUMENTS (to this Part B)	See attached document.		
2. ASSESSMENT DETAILS				
a.	CHANGE SPECIFICATION AND IMPACT			
As above				
b.	DRAFT LEGAL TEXT (if different from that originally submitted)			
See attached document (incorporating changes from SW, as agreed by the TP).				
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)			
As above.				
3.	TP DECISION	TP APPROVED		
4.	FINAL TP VIEWS			
5.	PLANNED IMPLEMENTATION DATE	As above		

WITHDRAWN BY PROPOSER?	NO
COMMENTS	
DATE OF WITHDRAWAL	

PART C – APPROVAL		
1.	DATE FINAL REPORT ISSUED TO COMMISSION	2011-11-21
2.	APPROVAL STATUS	APPROVED CHANGE
3.	DATE OF APPROVAL STATUS	2011-12-01
4.	COMMISSION RESPONSE REFERENCE	111201 Letter to CMA re TP meeting on 111020.pdf

PART D – IMPLEMENTATION		
1.	IMPLEMENTATION DATE	
2.	IMPLEMENTATION DETAILS (MC version, CSD versions, CMA Central System Release Number, etc.)	