

MARKET CODE / OPERATIONAL CODE CHANGE PROPOSAL

Form
version 2.1

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

OCCP055

Version No.

C.1

PART A — SUBMISSION

A.1. GENERAL DETAILS

A.1.a. TITLE Trade Effluent Enquiries and Consent process changes

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 Belinda Oldfield NAME Belinda Oldfield

A.1.d. CONTACT NAME Anne Munro CONTACT EMAIL; TEL./MOB. anne.munro@scottishwater.co.uk 07875 873693

A.1.e. ASSOCIATED MCCP / OCCP

A.1.f. ASSOCIATED DOCS. Annex C_Trade Effluent process changes (processes 15, 22, 25A, 25B), Annex A_TE Enquiry Form Version_1 4.xls, Annex B_Form H Version 3.xls

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)

Feedback from Licensed Providers has identified some improvements that need to be applied to the Trade Effluent processes.

Operational Code Process 15 – Trade Effluent Enquiries does not currently have its own form, Trade Effluent enquiries are often shoe horned into the existing Form K (Meter Verification Form) which requires details which are not relevant to the enquiry. This causes confusion and in addition does not easily allow LPs to provide the information pertinent to the specific nature of a Trade Effluent Enquiry This issue also applies to the existing Trade Effluent metering processes 25A and 25B.

The current Operational Code Process 22 (Application for and modification to a Trade Effluent Consent) could also benefit from a change. The Operational Code does not adequately describe the process to be undertaken by Licensed Providers and Non-Household Customers as specified in statute, namely serving notice on SW with an original Trade Effluent Notice signed in ink (not electronic or type written). This causes confusion which can result in delays or refusal of the application.

The section of Process 22 relating to Small and Temporary Agreements is no longer required as Scottish Water no longer enters into such arrangements.

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 purpose of the change is to provide clarity to Market Participants on the market arrangements for dealing with Trade Effluent meters and enquiries.

A new Trade Effluent Enquiries form is being Proposed (Form R) and is provided in Annex A. This form better supports Trade Effluent Enquiry requirements and Operational Processes 15, 25A and 25B. It also extracts Trade Effluent enquiries from the Form K.

The existing Form H has been updated and the Trade Effluent notice separated from the Operational Code form. The Trade Effluent Notice is a separate legal form required by The Sewerage (Scotland) Act 1968 which is outside the Operational Code and submitted by Licensed Providers to Scottish Water. This is shown in Annex B.

A number of Operational Code process updates have been proposed to provide clarity and better reflect the actual operation of the processes, the changes are provided in Annex C:

Process 22

The section of Process 22 relating to Small and Temporary Agreements has been removed as Scottish Water no longer enters into such arrangements.

Processes 25A and 25B

Minor wording changes to make it clear when in the process the customer should notify Scottish Water via its Licensed Provider.

Licensed Providers have been consulted regarding the proposed changes and feedback has been in positive.

Principles and Objectives affected

PRINCIPLE	AFFECTED (Y/N)	DESCRIPTION
Proportionality	Y	N/A
Transparency	Y	Provides better clarity around processes and responsibilities.
Simplicity, Cost-effectiveness, and Security	Y	Should be simpler for Licensed Providers. Operational Code change only, should be minimal cost implications.
Non-exclusivity	Y	N/A
Barriers to Entry	Y	N/A
Customer Contact	Y	N/A
Non-discrimination	Y	N/A

Non-detrimental to SW Core Functions	Y	N/A
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	Y	Additional Operational Code Form, changes to three Operational Code processes and one Operational Code form.
CSDs	N	No
Wholesale Services Agreements	N	No
Licenses	N	No
CMA Central Systems	N	No
CMA business processes	N	No
Trading Party systems	N	Minimal / No
Trading party business processes	Y	Minor process change, New Form introduced.

A.2.d. DRAFT LEGAL TEXT Required under Market Code Parts 8.7.1 (ii) (d) and 8.8.1 (ii) (d)	
The proposed additional Operational Code processes are set out in the Annex's.	
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.	
September 2017. At which point the changes will be applied to the Operational Code following approval by the Technical Panel and consultation by the Commission.	
A.3.b. ANY LIMITATIONS OR DEPENDENCIES FOR IMPLEMENTATION	

A.4. ANY OTHER COMMENTS

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PART B — TP ASSESSMENT

B.1. ASSESSMENT PROCESS

B.1.a. ASSESSMENT START DATE	2017-05-31	ASSESSMENT END DATE	2017-06-15
B.1.b. IMPACT ASSESSMENT REQUIREMENT	IA NOT REQUIRED		
B.1.c. CONSULTATION REQUIREMENT	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	
Benefit Estimate (L: < 10k, M: £10k to £100k, H: > £100k)	

B.3. TP DECISION TP APPROVED

B.4. FINAL TP VIEWS	Unanimously approved
B.5. PLANNED IMPLEMENTATION DATE	Next available Operational Code release

WITHDRAWN BY PROPOSER?	No
COMMENTS	
DATE OF WITHDRAWAL	

PART C — COMMISSION APPROVAL

C.1. DATE FINAL REPORT ISSUED TO COMMISSION	2017-06-29
C.2. APPROVAL STATUS	APPROVED CHANGE / REJECTED
C.3. DATE OF APPROVAL STATUS	yyyy-mm-dd
C.4. COMMISSION RESPONSE REFERENCE	

PART D — IMPLEMENTATION

D.1. IMPLEMENTATION DATE	yyyy-mm-dd
D.2. IMPLEMENTATION DETAILS (MC version, CSD versions, CMA Central Systems release number, etc.)	