

**MARKET CODE / OPERATIONAL CODE
CHANGE PROPOSAL**Form
version 2.2Change Proposal reference
(To be completed by the TP Sec.)**MCCP185**

Version No.

D.1**SUBMISSION**

GENERAL DETAILS

TITLE

Back-dated SPID De-registrations

COMPANY

CMA

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

AUTHORISED SIGNATURE

NAME

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Annex 1: Indicative URs
Annex 2: CSD0104 Changes
Annex 3: CSD0202 Changes

PROPOSED URGENCY

NON-URGENT

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

MCCP / OCCP DETAILS

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

There is an operational requirement for SW to be able to backdate De-registrations which can arise for a number of reasons; properties changing to Domestic, mergers, demolitions and so on. Often, there will be a time delay between the actual effective date of the change and the date when the evidence is available, or when the request is sent in by a customer, as it may be driven by an annual bill at the retail level, it may await an update to SAA data, or it may await a demolition certificate, for example. As a consequence, the customer processes a request with an historic date, or even if the date is current, the time taken for the LP and the SW to validate the request will mean that a number of weeks, at least, may have passed.

SW suggest that circa 600-700 of these cases arise each month.

Prior to the June 2015 Release, SW submitted such backdated De-registrations using the T015.0 (Update SPID Status).

However, CSD0104 (Section 3.5) requires that all Service Elements, including meters (and any associated Meter Networks) and Discharge Points cease to be active at a SPID at the time of the Deregistration. In many instances where the Deregistration was backdated, this was not the case. Furthermore, there were often instances where the backdating of the Deregistration effectively deleted LP meter reads.

These backdated De-registrations were accepted by the CMA CS because the validation undertaken at that time did not envisage such backdating; the CMA CS checked that all meters, DPIDs etc had 'Effective To Dates', but did not review the dates themselves.

As part of the June 2015 Release, in response to a request from SW, MCCP179 delivered a facility for SW to use the T015.0 as an Error Rectification transaction, enabling backdating of Permanent Disconnection and De-registration dates from originally submitted dates. However, the June Release also delivered improved validation (which now reviews effective to dates previously not reviewed) to ensure that all CSD0104 and other Market Code obligations were respected; in particular that any such backdating did not overwrite active Service Elements (noting that any such active SEs could also be backdated via RAs or in some cases transactions, as required, ahead of any T015.0 submission).

ISSUE

SW has raised concerns in respect of this arrangement, suggesting that the process now required to effect a backdated De-registration will either incur Performance Charges or administrative complexity:

- If transactions only are used (i.e. if the T015.0 is only submitted once full and reliable knowledge is obtained from customers and the LP), the associated late T005.0 F Read submission will attract a Performance Charge (although it should be noted that an original F read and Permanent Disconnection or Deregistration could be submitted and then RAs could be used to backdate all of these, avoiding the Performance Charges).
- If RAs are required (e.g. if LPs are required to backdate or delete LP submitted meter reads), time and costs are incurred by both SW and the LP.

There is an underlying issue of data integrity, in that a backdated De-registration date must remain consistent with the closing out of any active meters, DPIDs and other SEs. The difficulty is that SW has a responsibility to correctly identify Supply Points for Eligible Premises, including removing those SPIDs that have ceased to be so, but may need LPs to first remove certain meter reads for those SPIDs, since it is LPs who are the Data Owners for those reads.

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

This proposal seeks to establish a process to allow SW to more simply effect a backdated De-registration than currently, whilst ensuring that data integrity is maintained and that LP agreement to any removal of meter reads is duly accommodated. The options also enable this simplification to avoid any performance charges for SW. The options that have been considered include variations on delivering these two underlying requirements:

- **Data Integrity.** The rationale behind the CMA CS data is that a hierarchy is maintained, whereby meter reads and other meter data can only be attributed to existing meters with the appropriate status, which can only be associated to existing SPIDs with an appropriate status, which can only be associated to an LP with an appropriate status. Backing out any of these attributes can also only be done by reversing back through this hierarchy. This proposal seeks to manage this process automatically and this can only be done where this backing-out involves unambiguous data changes (not requiring any choices to be made by a Data Owner). A critical instance of this is that a meter can only be de-activated by an F read and this can only be valid if the F read date comes after any other read dates. To leave this logic intact, the options presented make use of a new D Read (De-reg Read) that can breach this rule, but delete the F read and any other reads that may be dated after the D Read date.
- **Data Ownership.** Whilst SW are obliged to remove any Supply Points that are no longer associated with Eligible Premises, LPs may be the Data Owners for meter reads for those Supply Points, dated after the date from which the Supply Point should have been removed. If SW wish to remove such a Supply Point, should the LP's agreement to the pre-requisite deletion of these meter reads need to be obtained? It should be noted that Process 31 (SW requested De-reg) and Process 32 (LP requested De-reg) of the Operations Code include LP agreement to a De-registration and LP agreement to a back-dated De-reg that involved the deletion of LP meter reads under the Market Code could therefore be assumed from the Ops Code processes. However, such an assumption would not allow for any LP check that the De-reg being submitted under the Market Code was the same as that under the Ops Code and so the proposal includes some form of explicit recognition of LP agreement, with suitable notifications to the LP.

The MPF has considered 4 options, each seeking different ways to deliver the requirement, consistent with the above two pre-requisites:

- **Option 1** leaves the existing transactions and data items unaffected and delivers a backdated De-registration (where deletion of LP meter reads is required) by amending

an existing De-registration via a new T015.2 transaction that also includes an LP agreement flag and a D Read. **The MPF has determined (on 2019-02-21) that this option need not be further considered (and no Indicative URs are provided for this option).**

- **Option 2** also leaves existing transactions and data items unaffected and enables the amendment of an existing De-registration and deletion of relevant LP meter reads by use of a D Read, but with further new transactions allowing for explicit agreement from an LP before such amendment can be given effect. **The MPF has determined (on 2019-02-21) that this option need not be further considered (and no Indicative URs are provided for this option).**
- **Option 3** also leaves existing transactions and data items unaffected but modifies Option 1 to more closely reflect the pre-2015 approach. A new T015.2 transaction provides an alternative to the existing T015.0, with the additional requirement to provide a D Read and an LP agreement flag, specifically for back-dated De-registrations that involve the de-activation of a meter and possibly the deletion of meter reads on that meter.
- **Option 4** also leaves existing transactions and data items unaffected but modifies Option 3. As with Option 3, a new T015.2 transaction provides an alternative to the existing T015.0, with the additional requirement to provide a D Read, specifically for back-dated De-registrations that involve the de-activation of a meter and possibly the deletion of meter reads on that meter. However, in place of an LP agreement flag, further new transactions allow for explicit agreement from an LP before such a change can be given effect. **The MPF has determined (on 2019-04-18) that this option need not be further considered (and no Indicative URs are provided for this option).**

For the remaining Option 3:

- The SPID must have a D2025 Status other than; REJ.
- Any Pending Transfers would be cancelled (with a Cancellation Reason of 'Supply Point De-Registered')
- The SPID cannot be an MT SPID.
- The SPID cannot be a Main SPID or a Sub-SPID (i.e. cannot be part of a Meter Network).
- If the Supply Point were an SS SPID, with an associated WS SPID that had a Tankered Effluent, Private Effluent or Private Water meter on it, a D read for such meter would be required.
- If the Supply Point were either a WS SPID with an associated SS SPID, or an SS SPID and the SS SPID had a DPID on it, the DPID would need to be explicitly de-activated from the effective date of the De-reg (or revised effective date), before a back-dated De-reg could be processed.
- The process can only be managed feasibly with the SPID having one meter associated with it.
- The D Read would need to be validated as being more than the most recent prior read and less than the most recent subsequent read, if any such exists (this latter would then be subject to deletion, if the back-dating were to proceed) and, following validation of the back-dating would become a revised F Read for the associated meter.
- The options could be extended to cover back-dated Permanent Disconnections, with minimal additional processing.

- It is also assumed that the T015.2 could be used as an Error Rectification transaction, whereby additional T015.2s could be submitted, if SW determined that a prior back-dated De-reg (or PDISC) had not been back-dated far enough.
- The T015.2 effective from date cannot be on a day on or before a TTRAN or PPDISC period for a SPID, as these types of status are core related.
- The T015.2 will be identified as a response transaction for the R1, R3 and R5 Performance Measures, but will be excluded from the R6 measure.
- The CMA would provide a periodic report to the Technical Panel, to allow for the use of the backdating facility to be reviewed.

Principles and Objectives affected
CMA Guidance Note GN009 may be referred to for assistance with this section

PRINCIPLE	AFFECTED (Y/N)	DESCRIPTION
Proportionality	Y	Processes are simplified, whilst maintaining data integrity and data ownership.
Transparency	Y	Data Owner agreement to meter read changes following a back-dated De-reg are made explicit.
Simplicity, Cost-effectiveness, and Security	Y	A single additional transaction can be used to replace a number of RAs or Txns that currently give rise to performance charges that should not apply.
Non-exclusivity	N	
Barriers to Entry	Y	New entrants will avoid the risk of their SPIDs being removed from the market, without their prior involvement.
Customer Contact	N	
Non-discrimination	N	
Non-detrimental to SW Core Functions	N	
MC / OC OBJECTIVES	N	

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	N	
CSDs	Y	See below.

Wholesale Services Agreements	N	
Licenses	N	
CMA Central Systems	Y	A new Transaction, a new Data Item and a new Meter Read Type are required.
CMA business processes	N	
Trading Party systems	Y	SW and LPs will need to handle the new transaction and notification and the new D Read.
Trading Party business processes	Y	SW will need to reflect LP agreement in the new transaction.

DRAFT LEGAL TEXT

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

Changes will be required to;

- **CSD0104 Part 1 (Maintain SPID Data - SPID Level)**, see Annex 2.
- **CSD0105 (ERRA)**, Section 2.1, step c should be amended as follows (red text):
 - **Step c Error Rectification [T012.0, T012.5, T012.7, T013.0, T013.2, T015.0, T015.2, T029.3, T32.0, T033.0]** Where an Error Rectification is required, the Data Owner will notify the CMA of the late/corrective SPID Data Item using Data Transaction T012.0 (Update Misc SPID Data), T012.5 (Update SAA Reference Number/UPRN), T013.0 (Update Meter Details), T013.2 (Update Meter Location), T015.0 (Declare Disconnection/Reconnection/Deregistration), **T015.2 (Backdated Dereg/ PDISC)**,
 - The Process Diagrams and table will require to be amended also.
- **CSD0202 (Meter Read Submissions)**, see Annex 3.
- **CSD0203 (Meter Read Validation)**: Section 2 should include references to the T015.2 transaction and Section 2.1.1 needs to be re-stated so as to correctly reflect the current requirements and to additionally include the T015.2, as follows (red text):

2.1 Registration and Content Validation:

- The validation also checks that the Data Transaction content is valid (e.g. the Meter Read value is populated) and that the Meter Read date is not a date which is later than the date of submission of the Meter Read or earlier than the date of a previous Meter Read **except in the case of a T015.2 (Backdated Dereg/PDISC)**.

2.1.1 Treatment of meter reads

For any T17 Meter Chain, no read can be submitted prior to an I read and for any meter, no read can be submitted prior to an I read or an O read. If a Data Transaction T005.0, T005.1, or T015.2 is submitted that is not in accordance with these requirements, the CMA will reject the Data Transaction and issue a T009.0 or T009.1 with a suitable Error Code.

- **CSD0301 (Data Catalogue)**, as follows:
 - Sections 2.3 and 2.4 should have the following Data Item added;

Data Item Number:	D2047
Data Item Name:	LP De-reg/PDISC Rejection Indicator
Data Item Logical Type:	Boolean
Member of unique serial set:	no
Member of Valid Set:	no
Data Group:	SPID
Correction Method:	Error Rectification
Data Owner:	SW
Description:	Identifies whether SW has obtained the agreement of the relevant LP for a back-dated De-reg/PDISC for a SPID and associated meter read deletions.

- Sections 4.2 and 4.3 should have the following transactions added;

Transaction Number	T015.2	
Transaction Name	Back-dated Dereg/PDISC	
From	SW	
To	CMA	
DI #	Name	FLAG
D2001	SPID	RQ
D2025	SPID Status	RQ
D3001	Meter ID	RQ
D3008	Meter Read	RQ
D3020	Rollover Indicator	OP
D2047	LP De-reg/PISC Rejection Indicator	RQ
D4006	Effective From	RQ
Description	A Deregistration that involves the de-activation of a meter.	

Transaction Number	T015.3	
Transaction Name	Notification of a Back-dated Dereg/PDISC	
From	CMA	
To	LP/SW	
DI #	Name	FLAG
D2001	SPID	RQ
D2025	SPID Status	RQ
D3001	Meter ID	RQ
D3021	Rollover Flag	RQ
D3008	Meter Read	RQ
D2047	LP De-reg/PDISC Rejection Indicator	RQ
D4006	Effective From	RQ
Description	A back-dated Dereg/PDISC, with meter de-activation.	

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 0. Any quoted lead time should commence from date of Approval.

March 2020

ANY LIMITATIONS OR DEPENDENCIES FOR IMPLEMENTATION

ANY OTHER COMMENTS

Indicative User Requirements are given in Annex 1.

TP ASSESSMENT

ASSESSMENT PROCESS

ASSESSMENT START DATE	2019-01-15	ASSESSMENT END DATE	2019-06-20
IMPACT ASSESSMENT REQUIREMENT	IA REQUIRED		
CONSULTATION REQUIREMENT	TP CONSULTATION NOT REQUIRED		
ASSOCIATED DOCUMENTS (to this Part B)			

ASSESSMENT DETAILS

CHANGE SPECIFICATION AND IMPACT (if different from that originally submitted)

DRAFT LEGAL TEXT (if different from that originally submitted)

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	£60.1k (IA + 33%)
Benefit Estimate (L: < 10k, M: £10k to £100k, H: > £100k)	
TP DECISION	TP APPROVED
FINAL TP VIEWS	Unanimously approved on 20 th June 2019
PLANNED IMPLEMENTATION DATE	March 2020

WITHDRAWN BY PROPOSER?	No
COMMENTS	
DATE OF WITHDRAWAL	

COMMISSION APPROVAL	
DATE FINAL REPORT ISSUED TO COMMISSION	2019-07-24
APPROVAL STATUS	APPROVED CHANGE
DATE OF APPROVAL STATUS	2019-08-15
COMMISSION RESPONSE REFERENCE	

IMPLEMENTATION	
IMPLEMENTATION DATE	2020-03-26
IMPLEMENTATION DETAILS (MC version, CSD versions, CMA Central Systems release number, etc.)	
CSD0104 (Part 1) v	