MARKET CODE / OPERATIONAL CODE CHANGE PROPOSAL			Form version 2.3
Change Proposal reference (To be completed by the TP Sec.)	**MCCP224**	Version No.	**D.3**

PART A — SUBMISSION

A.1.	GENERAL DETAILS			
A.1.a.	TITLE	SPID Address Ownership		
A.1.b.	COMPANY	SWW		
Change Proposals must be authorised by the person designated by the signatory to the Market Code Framework / Accession Agreement				
A.1.c.	AUTHORISED SIGNATURE		NAME	Stephen McIntosh
A.1.d.	CONTACT NAME	Stephen McIntosh	CONTACT EMAIL; TEL/MOB.	Stephen.mcintosh@scottishwater.co.uk
A.1.e.	ASSOCIATED MCCP / OCCP	OCCP069		
A.1.f.	ASSOCIATED DOCS.			
A.1.g.	PROPOSED URGENCY	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)

This proposal has been created on request from Scottish Water and follows consideration of which Trading Party constitutes the natural owner of the SPID Address Data.

There are a number of distinct address related Data Items:
- The Postal Address Format (PAF) elements of the Address Block (D5001 to D5013), applicable separately to SPIDs, Meters and DPIDs and under the ownership of SW, except for the SPID Address, which is created by SW, but transfers to the LP following successful registration.
- The SAA Data (elements of the Address Block - D2037 to D2040), applicable to SPIDs, owned by SW and
- The GIS Data (D3017 to D3019), applicable to Meters and owned by SW (except for the D3019 GIS Z Free Descriptor; owned by SW or the relevant LP).

The relevant Transactions pertaining to these Data Item sets are as follows:
- T001.0 (Request New SPID) that includes the PAF elements of the Address Block and the SAA Data, submitted by SW.
- T004.0 (Request New Meter) that includes the Meter (PAF) Address Data and the GIS Data, submitted by SW
- T012.0 (Submit SPID Data) that includes the SPID PAF Address Data, submitted by the LP.
- T012.5 (Submit SAA/UPRN Data) that includes the SAA Data, submitted by SW
- T013.0 (Submit Meter Data) that includes the Meter (PAF) Address Data and the GIS Data, submitted by SW
- T013.2 (Submit Meter Location) that includes the GIS Data, submitted by SW or an LP
- T021.0 (Create New DPID) that includes the DPID (PAF) Address Data, submitted by SW
- T027.0 (Update DPID Data) that includes the DPID (PAF) Address Data, submitted by SW.

The SAA Data (SAA Reference, UPRN and associated Absence Codes) was introduced in March 2015 and is under SW's ownership. These are assessed against SPID cores (currently, over 86% of SPIDs have a live match to the SAA, with the remaining 14% having valid absence codes). This assessment is an ongoing process, involving managing a premises register and modifying SPID configurations (splits and merges).

However, SW has no mechanism to update the SPID (PAF) Address following such reviews and this can result in inconsistencies in market data across market participants and the CMA. These inconsistencies, along with others that may arise between SPID (PAF) Address, SAA Data, Meter Address and DPID Address, can create operational difficulties for field activity when locating premises, meters, or discharge points.

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 proposal is to transfer ownership of the SPID (PAF) Address Data Items from the Licensed Provider to Scottish Water, consistent with the address referencing implemented in March 2015 and the current ownership of other address data, to create a consistent, single owner for all address related data. This is also consistent with the direction taken by the English market.

In practice, this means that the T012.0 transaction would be submitted by SW, instead of the LP. This, incidentally, also means that the D2043 LP Connection Reference would also be under the ownership of SW consistently: It currently sits with SW when a new SPID is created (albeit notified to SW by the LP) and is then also updated via the T012.0.

One additional change to support this is to create a new notification transaction, since the existing T012.9 will now need to be used to notify changes in SPID PAF Address (made by SW via the T012.0) to LPs. This necessitates the SPID Variable Data that is currently also notified via the T012.9 (following changes made via a T012.10 by the LP) to be notified to SW via a new notification: a T012.11.

Principles and Objectives affected CMA Guidance Note GN009 may be referred to for assistance with this section		
PRINCIPLE	AFFECTED (Y/N)	DESCRIPTION
Proportionality	Y	See below.
Transparency	Y	Removes ambiguity of data ownership
Simplicity, Cost-effectiveness, and Security	Y	Simplifies the responsibility for relevant data updates and minimises data inconsistencies.
Non-exclusivity	N	
Barriers to Entry	N	
Customer Contact	N	
Non-discrimination	N	
Non-detrimental to SW Core Functions	N	
MC / OC OBJECTIVES	N	

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	N	
CSDs	CSD0104 Part 1 CSD0301	T012.0 to be submitted by SW, instead of the Current LP, T012.9 to be notified to the relevant LP(s) and a new T012.11 notification to be provided.
Wholesale Services Agreements	N	
Licenses	N	

CMA Central Systems	Y	As above.
CMA business processes	N	
Trading Party systems	Y	As above.
Trading party business processes	N	

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

CSD0104 Part 1 Maintain SPID Data (SPID Level) should be amended as follows (red text):

Section 5.2 Establishing a Water Supply at a Pseudo Water Services Supply Point.

Step d: ~~Licensed Provider (WS)~~Scottish Water updates SPID Address Free Descriptor details [T012.0]

Within 2 Business Days of receiving notification in the T029.0 (at step c above) of the modification to a 0% discount in the revised Data Item D2003, ~~the Water Services Licensed Provider~~Scottish Water shall send Data Transaction T012.0 (Submit SPID Data) to update the SPID Address to amend the reference to a PSEUDO WATER SPID in the D5001 Free Descriptor field. The information notified shall include all relevant address information as applicable to the Supply Point and the D5001 information shall note 'CONVERTED PSEUDO WS SPID'

Licensed providers should note that the discount will not be applied to the Water Services Supply Point with effect from the date notified in the T029.0 above.

Section 6.7 Process for a Change to Miscellaneous Data.

Step a: Update to Miscellaneous SPID Data [T012.0, T012.10, T033.0]

~~The Licensed Provider~~Scottish Water is able to update ~~certain~~address related SPID Data Items on an ad hoc basis, using Data Transaction T012.0 (Submit SPID Data). ~~for data with no explicit effective date, and~~ The Licensed Provider is able to update certain SPID Data Items that have an associated effective date, using Data Transaction T012.10 (Submit SPID Variable Data)~~for data with an effective date~~.

The relevant data is listed in Section 4.3 of the Data Transaction Catalogue.

Step c: Notify the Licensed Provider, or Scottish Water [T012.11, T012.9].

Following the successful submission of a T012.0, the SPID Data update will be notified to ~~Scottish Water~~the Licensed Provider and the Licensed Provider for any associated SPID, if different, using a T012.9 (Notify SPID Data).

Following the successful submission of a T012.10, the variable SPID Data update will be notified to Scottish Water using a T012.~~9~~11 (Notify Variable SPID Data), excluding any changes to Vacancy or Rateable Value (which are notified separately).

CSD0301 Data Transaction Catalogue should be amended as follows:

Section 2.4 Catalogue: Data Items (numerical order). The Data Owner for the following Data Items should be changed from 'SW or LP' to 'SW':
- D2043 LP Connection Reference
- D5001 Free Descriptor
- D5002 Sub Building Name
- D5003 Building Name

- D5004 Building Number
- D5005 Dependent Thoroughfare Name
- D5006 Dependent Thoroughfare Descriptor
- D5007 Thoroughfare Name
- D5008 Thoroughfare Descriptor
- D5009 Double Dependent Locality
- D5010 Dependent Locality
- D5011 Post Town
- D5012 County
- D5013 Postcode

Section 4.2. List of Data Transactions. Add the following new transaction:
- Name. Notify SPID Variable Data
- Transaction. T012.11

Section 4.3 Catalogue: Transactions (numerical order). The following additions/amendments should be made (red text):

Transaction Number	T012.0	
Transaction Name	Submit SPID Data	
From	~~LP/~~SW	
To	CMA	
DI #	**Name**	**FLAG**
D2001	SPID	RQ
D2043	LP Connection Reference	OP
D4003	Text Comment Field	RQ
D5001	Free Descriptor	OP
D5002	Sub Building Name	OP
D5003	Building Name	OP
D5004	Building Number	OP
D5005	Dependent Thoroughfare Name	OP
D5006	Dependent Thoroughfare Descriptor	OP
D5007	Thoroughfare Name	OP
D5008	Thoroughfare Descriptor	OP
D5009	Double Dependent Locality	OP
D5010	Dependent Locality	OP
D5011	Post Town	OP
D5012	County	OP
D5013	Postcode	OP
Description	Ad hoc update of ~~non-chargeable~~ address related SPID data ~~by the LP, or~~ by SW ~~for TTRAN SPIDs~~	

Transaction Number	T012.9	
Transaction Name	Notify SPID Data	
From	CMA	
To	LP/SW	
DI #	**Name**	**FLAG**

D2001	SPID	RQ
~~D4006~~	~~Effective From~~	~~OP~~
~~D2005~~	~~Customer Classification~~	~~OP~~
~~D2008~~	~~SIC Code~~	~~OP~~
D2043	LP Connection Reference	OP
D4003	Text Comment Field	OP
D5001	Free Descriptor	OP
D5002	Sub Building Name	OP
D5003	Building Name	OP
D5004	Building Number	OP
D5005	Dependent Thoroughfare Name	OP
D5006	Dependent Thoroughfare Descriptor	OP
D5007	Thoroughfare Name	OP
D5008	Thoroughfare Descriptor	OP
D5009	Double Dependent Locality	OP
D5010	Dependent Locality	OP
D5011	Post Town	OP
D5012	County	OP
D5013	Postcode	OP
Description	Notifies the LP (or SW for a TTRAN SPID) of the update of ~~non-chargeable~~address related SPID data by ~~the LP~~SW, ~~or by SW for TTRAN SPIDs Only the D4006, D2005 and D2008 will be populated following a T012.10 and only the remaining Data Items will be populated following a T012.0~~	

Transaction Number	T012.11	
Transaction Name	Notify SPID Variable Data	
From	CMA	
To	SW	
DI #	**Name**	**FLAG**
D2001	SPID	RQ
D4006	Effective From	OP
D2005	Customer Classification	OP
D2008	SIC Code	OP
Description	Notifies SW of the update of variable SPID data by the LP, or by SW for TTRAN SPIDs.	

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.

March 2022

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

A.4.	ANY OTHER COMMENTS

Indicative User Requirements are as follows:

UR 1 Data Items. The following Data Items should have their ownership changed from 'SW or LP' to 'SW':
- D2043 LP Connection Reference
- D5001 Free Descriptor
- D5002 Sub Building Name
- D5003 Building Name
- D5004 Building Number
- D5005 Dependent Thoroughfare Name
- D5006 Dependent Thoroughfare Descriptor
- D5007 Thoroughfare Name
- D5008 Thoroughfare Descriptor
- D5009 Double Dependent Locality
- D5010 Dependent Locality
- D5011 Post Town
- D5012 County
- D5013 Postcode

UR 2 T012.0 Transaction. The T012.0 should be amended as follows (red text):

UR 2.1 T012.0 Content.

Transaction Number	T012.0	
Transaction Name	Submit SPID Data	
From	~~LP/~~SW	
To	CMA	
DI #	Name	FLAG
D2001	SPID	RQ
D2043	LP Connection Reference	OP
D4003	Text Comment Field	RQ
D5001	Free Descriptor	OP
D5002	Sub Building Name	OP
D5003	Building Name	OP
D5004	Building Number	OP
D5005	Dependent Thoroughfare Name	OP
D5006	Dependent Thoroughfare Descriptor	OP
D5007	Thoroughfare Name	OP
D5008	Thoroughfare Descriptor	OP
D5009	Double Dependent Locality	OP
D5010	Dependent Locality	OP
D5011	Post Town	OP
D5012	County	OP

	D5013	Postcode	OP
Description		Ad hoc update of ~~non-chargeable~~ address related SPID data ~~by the LP, or~~ by SW ~~for TTRAN SPIDs~~	

UR 2.2 Validation. The current validation to check that the Sender is the Current LP for the submitted D2001 SPID should be modified to check that the Sender is SW. If this is not the case, the transaction should be rejected via the T9 Helper, with error code DL.

UR 2.3 Processing. Processing should remain as is, except that, on completion of any updates and issue of a T9 to the sender, a T012.9 should be issued via the T9 Helper, as follows:

- Wholesaler to LP: Y
- LP to Wholesaler: N
- Reflexive: N
- Associated SS LP: Y
- Associated WS LP: N
- Prior LP: N
- Incoming LP: N

Commentary: The T012.0 is the transaction that notifies the SPID PAF Address and therefore provides the simplest approach towards changing the update responsibility (and associated data ownership) from the LP to SW.

UR 3 T012.9 Transaction. The T012.9 should be amended as follows (red text):

Transaction Number	T012.9	
Transaction Name	Notify SPID Data	
From	CMA	
To	LP/SW	
DI #	**Name**	**FLAG**
D2001	SPID	RQ
~~D4006~~	~~Effective From~~	~~OP~~
~~D2005~~	~~Customer Classification~~	~~OP~~
~~D2008~~	~~SIC Code~~	~~OP~~
D2043	LP Connection Reference	OP
D4003	Text Comment Field	OP
D5001	Free Descriptor	OP
D5002	Sub Building Name	OP
D5003	Building Name	OP
D5004	Building Number	OP
D5005	Dependent Thoroughfare Name	OP
D5006	Dependent Thoroughfare Descriptor	OP
D5007	Thoroughfare Name	OP
D5008	Thoroughfare Descriptor	OP
D5009	Double Dependent Locality	OP
D5010	Dependent Locality	OP
D5011	Post Town	OP
D5012	County	OP
D5013	Postcode	OP

Description	Notifies the LP (or SW for a TTRAN SPID) of the update of ~~non-chargeable~~address related SPID data by ~~the LP~~SW, ~~or by SW for TTRAN SPIDs Only the D4006, D2005 and D2008 will be populated following a T012.10 and only the remaining Data Items will be populated following a T012.0~~

Commentary: Currently, the T012.9 is used as a notification to SW of updates from two sources: the T012.0 for SPID PAF Address changes and the T012.10 for SPID Variable Data changes. With the change of sender for the T012.0, the T012.9 now needs to be notified to the LP, but this necessitates a need for the notification following a T012.10 update to be dealt with via another transaction.

UR 4 Processing for the T012.10 Transaction. Following any updates, a T9 should be issued to the sender and a T012.11 should be issued via the T9 Helper, as follows:
- Wholesaler to LP: N
- LP to Wholesaler: Y
- Reflexive: N
- Associated SS LP: N
- Associated WS LP: N
- Prior LP: N
- Incoming LP: N

UR 5 New T012.11 Transaction. A new T012.11 (Notify Variable SPID Data) should be established, with content as follows:

Transaction Number	T012.11	
Transaction Name	Notify SPID Variable Data	
From	CMA	
To	SW	
DI #	**Name**	**FLAG**
D2001	SPID	RQ
D4006	Effective From	OP
D2005	Customer Classification	OP
D2008	SIC Code	OP
Description	Notifies SW of the update of variable SPID data by the LP, or by SW for TTRAN SPIDs.	

Commentary: As described above, this new transaction constitutes the simplest mechanism for notifying SW of changes to relevant SPID Variable Data, assuming SW has a use for this, following an update from an LP via the T012.10. This new transaction replaces the notification originally included in the T012.9, now that this notification must go to the LP and not SW.

UR 6 LVI

UR 6.1 Submit Transactions [LVI URS/Section 2.7/UR 2]. The drop-down (and quick-links) for the T012.0 should be changed from 'SW or LP' to 'SW'.

UR 6.2 Dashboards [LVI URS/Section 2.6/UR 2 Message Activity Dashboard Content]. The T012.0 should continue to be available to both LPs and SW.

PART B — TP ASSESSMENT

B.1. ASSESSMENT PROCESS

B.1.a. ASSESSMENT START DATE	2021-07-13	ASSESSMENT END DATE	2021-09-13
B.1.b. IMPACT ASSESSMENT REQUIREMENT		IA 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 SPEC AND IMPACT (IF DIFFERENT FROM THAT ORIGINALLY SUBMITTED)

B.2.b. CMA INTERNAL SYSTEMS IMPACT

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

B.2.d. 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	£14.9k (IA + 33%)
Benefit Estimate (L: < 10k, M: £10k to £100k, H: > £100k)	Streamlined process for updating SPID addresses (avoiding remedial action under the Market Code etc). Assume: M/H.
B.3. TP DECISION	TP APPROVED
B.4. FINAL TP VIEWS	Unanimously approved on 19/08/21
B.5. PLANNED IMPLEMENTATION DATE	March 2022

WITHDRAWN BY PROPOSER?	No
COMMENTS	
DATE OF WITHDRAWAL	

PART C — COMMISSION APPROVAL

C.1.	DATE FINAL REPORT ISSUED TO COMMISSION	2021-09-01 (Version B.2 submitted)
C.2.	APPROVAL STATUS	APPROVED CHANGE
C.3.	DATE OF APPROVAL STATUS	2021-09-24
C.4.	COMMISSION RESPONSE REFERENCE	

PART D — IMPLEMENTATION

D.1.	IMPLEMENTATION DATE	2022-03-24
D.2.	IMPLEMENTATION DETAILS (MC version, CSD versions, CMA Central Systems release number, etc.)	

CSD0104 v21
CSD0301 v27