

MARKET CODE / OPERATIONAL CODE CHANGE PROPOSAL

Form
version 2.3

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

MCCP264

Version No.

D.3

SUBMISSION

GENERAL DETAILS

TITLE Medium Volume Interface (MVI)

COMPANY CMA Scotland

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

AUTHORISED
SIGNATURE

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ASSOCIATED MCCP /
OCCP

ASSOCIATED DOCS.

Annex 1: LVI Usage.(Confidential Market Data and not to be shared out with the TP)
Annex 2: MVI Wireframes.
Annex 3: MVI Import Template.(Confidential IP and not to be shared out with the TP)

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)

Participants have identified a potential improvement to the interfaces that are currently available for message exchanges with the CMA Central Systems and an associated issue has also been identified by the CMA.

Since market opening, the CMA has provided two interfaces with the CMA CS: a Low Volume Interface (LVI), ostensibly to facilitate the submission of transactions and RAs via manual processes and a High Volume Interface (HVI), which allows for a large volume of uploads and downloads to be made using a structured interface.

Participants have suggested that the investment in their ability to use the HVI requires some cost and complexity and that an alternative Medium Volume Interface (MVI) might provide an alternative, allowing some of the facilities associated with the HVI to be made available more simply and cheaply.

Additionally, the CMA has implemented a number of enhanced security measures, to ensure ongoing compliance with Market Code Data Protection obligations and to continue to meet its IT Policies. One such initiative has been the development of the CMA's suspicious activity monitoring, and this has suggested that some participants may in fact be using 'robots' (automated data submission algorithms) via the LVI and these are identified as potentially suspicious, requiring CMA and participant investigation to ensure that such activity is in fact legitimate. The use of an MVI for these automated submissions is considered to provide a useful way of avoiding the need to establish 'robot' submissions via the LVI.

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 deliver a Medium Volume Interface (MVI) that combines the simplicity of the LVI, with the ability to manage bulk message transfers, as is done with the HVI, albeit without the full scope afforded by the HVI itself.

The general principles to be adopted are as follows:

- Access to the MVI will be via the LVI. This will allow the existing infrastructure to be used, including the security arrangements for the LVI: Principally, the ability to identify authorised Users and DAs for MVI access and use.
- Access via the LVI can be provided via suitable LVI screens and reports.
- The MVI will initially be set up to allow for the bulk upload of identified transactions and the bulk provision of notifications in response.
- The MVI will be limited to a small number of transactions, initially, so as to deliver the optimal cost-benefit. However, it will be possible for the scope of the MVI to grow over time to encompass a wider range of transactions.
- Based on analysis (See Annex 1), the initial scope for the MVI will be limited to the following transactions and their associated notifications (T009.0s and T008.1s, as appropriate):
 - T005.1s (Submit Meter Read (LP))
 - T003.1s (Registration Application)
 - T032.0s (Submit Customer Name)
- A single template spreadsheet covering all the identified transactions (with a separate worksheet for each submission transaction) will be made available in Excel via a new MVI page.

- MVI activity will be reported in a similar fashion to the HVI reporting currently available on the LVI.

Delivery is proposed for the March 2023 Release.

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

PRINCIPLE	AFFECTED (Y/N)	DESCRIPTION
Proportionality	Y	The wider choice of interfaces with the CMA CS can be provided without undue complication.
Transparency	Y	The spurious identification of suspicious activity will be removed.
Simplicity, Cost-effectiveness, and Security	Y	The MVI can be provided at relatively modest cost and enables participants to tailor their use of the most efficient interface for their requirements.
Non-exclusivity	N	
Barriers to Entry	Y	Allows for new entrants to opt for the most appropriate interface to suit their anticipated activity in the arrangements.
Customer Contact	N	
Non-discrimination	Y	Mitigates the impact of switching from LVI to HVI for medium sized LPs.
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	Y	All references to the Low Volume Interface continue to cover all relevant obligations. A definition of the Medium Volume Interface should be added to Schedule 1.
CSDs	N	
Wholesale Services Agreements	N	

Licences	N	
CMA Central Systems	Y	An additional submission interface (an MVI) will be established, via the LVI.
CMA business processes	N	
Trading Party systems	Y	Participants may make use of the new MVI
Trading party business processes	Y	Participants may need to establish and maintain MVI Users and DAs but will then be able to submit and receive bulk messages for identified txns.

DRAFT LEGAL TEXT

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

The **Market Code** should be changed, as follows (red text):

Schedule 1: Definitions. Add 'Medium Volume Interface'. With a definition of 'The meaning given in the Data Transaction Catalogue'.

CSD0301 should be modified as follows (red text):

Section 1 Purpose and Scope.

1. the **Low Volume Interface (LVI)**

- a. this interface is web based and available to all Trading Parties
- b. incorporates a Medium Volume Interface which allows large data volumes to be transacted for limited transaction types
- c. it is unsuitable for Trading Parties with large data volumes to transact and / or those seeking a greater degree of process automation, except where the MVI can be used.
- d. for further information on the LVI please refer to the [CMA LVI User Manual]

CSD0301 Annex. The Introduction should be modified to include references to the MVI, as a subsidiary interface to the LVI.

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 2023

ANY LIMITATIONS OR DEPENDENCIES FOR IMPLEMENTATION

ANY OTHER COMMENTS

Indicative User Requirements are as follows:

UR 1 User Access (TP URS/Section 2.5.3/UR 3). A new security privilege should be available to be allocated by an LP DA for 'MVI Submit Transactions' and the following new privilege allocation should be added to the existing UR: 'LP DAs only – MVI Submit Transactions (will provide page access, if selected)'.

UR 2 New LVI Page: MVI (LVI URS/New Section 2.8). A new page, entitled 'MVI' should be established on the LVI, in accordance with the following update for the LVI URS:

Section 2.8 MVI

UR 1 Access.

UR 1.1 Read only access can be authorised for CMA Users.

UR 1.2 LP Users may be given any of the following access and security privileges:

- The 'MVI Submit Transactions' security privilege will allow navigation to this page and the ability to both download and upload MVI File Templates and MVI File submissions, as appropriate.
- The 'MVI' page access will allow navigation to this page.

UR 1.3 Access can only be gained via direct navigation.

UR 2 Content. The content of the MVI page and its subsidiary pages should be as identified in Annex 2: MVI Wireframes.

UR 3 MVI File Submission Templates. MVI File submissions will be in Excel, as follows and in the format identified in Annex 3: MVI Import Template:

UR 3.1 These should be formatted, as follows:

- Header info. MVI File Number (to be automatically completed on receipt by the CMA HVI Receive Module, in the form [LP[OrgID]nnnnn] where nnnnn is a sequential and unique number.
- Header Info. Other information required by the CMA CS will be automatically generated on submission, or notification, as appropriate.
- Rows. Each (non-empty) row should automatically be allocated a MID on submission.
- Columns. Relevant Data Items for each of the selected transactions on their respective worksheets, flagged to identify those Items that are required (to be completed by the User). Formats should be identical to those required under the LVI (as specified in CSD0301).

UR 3.2 Excel conditional formatting should be included to highlight in red where any field is not in the correct format and rows should be highlighted in red where the row has a required (RQ) data item missing.

UR 4 Validation for MVI File Submissions. Validation will comprise three phases and will be executed on submission of an MVI File, when the File will be given a status of PENDING and will be given an MVI File Number and timestamp:

- MVI File Anti-virus checking.
- MVI File Validation

- **MVI File Row Validation.** If a submission transaction is selected from the drop-down list, data element restrictions will be applied to each row (which will constitute an individual transaction submission) of any MVI File that is uploaded.

UR 4.1 MVI File Anti-Virus Checking. Anti-virus checking should be carried out on any submitted MVI File. If this check fails, a message should be provided to the CMA identifying the failure and the submitting User and the file rejected.

UR 4.2 MVI File Validation.

UR 4.2.1 MVI File Format. A File will be validated to ensure that all required header fields have been completed and that all rows conform to the required format and content (i.e. Schema validation). Any failure will result in the MVI File being rejected and a suitable message provided via the LVI on submission.

UR 4.2.2 MVI File Size. A File must include no more than 1000 rows per worksheet. If this is not the case, the MVI File should be rejected, and a message provided via the LVI on submission.

UR 4.2.3 If MVI File Validation is passed, the MVI File should be given a status of ACCEPTED. Otherwise, the status will be REJECTED. Each such status update should also be timestamped.

UR 4.3 MVI File Row Validation.

UR 4.3.1 If an MVI File is an exact duplicate of a previously submitted File, it will be rejected.

UR 4.3.2 Validation should replicate that for LVI transaction submissions. Any validation failures should result in the row being allocated the relevant transaction error code and no further processing should be executed for that row.

UR 5 Processing for MVI File Submissions. If an MVI File is given a status of ACCEPTED, the following steps will be executed:

UR 5.1 All valid rows will be processed as valid transactions

UR 5.2 Notification transactions will be generated accordingly.

UR 5.3 The MVI File will be given a status of COMPLETED and will be suitably timestamped.

Commentary: This is similar to the arrangements for RAs but using Excel. The choice of txns reflects those submissions where in excess of 3,500 submissions per quarter appear to arise, with future use most likely to remain at such levels, along with their associated notifications. However, the design and overall approach allow for the MVI to grow, as required. The use of an MVI File Number allows submission and notifications to be uniquely identified (similar to PO numbers and RA numbers for RAs) and, hence, an exact duplicate will be rejected.

UR 3 LVI Reports page.

UR 3.1 Reports/Transactions per Trading Party (LVI URS/Section 2.3/UR 17). The content of these reports should be modified, as follows:

- Interface
 - Empty (for combined HVI, MVI, and LVI figures)

- HVI
- MVI
- LVI

UR 3.2 Reports/Transaction Processing (LVI URS/Section 2.3/UR 20.6 Processing by TP).

The results on this page should be modified, as follows:

- Number of Batches (over the selected periodicities). Batches will comprise one transaction for LVI submissions and MVI Files will constitute one Batch.

Commentary: Most reports are unaffected and many reports on the LVI will, in effect, simply treat use of the MVI as use of MVI pages within the LVI. The modifications above are identified only where a distinction needs to be made between true LVI and MVI.

UR 4 LVI Dashboard.

UR 4.1 New Dashboard – MVI File Information (LVI URS/Section 2.6/New UR 6). This should include (for authorised LP and CMA Users):

UR 6.1 A recent summary of the MVI Files that have been submitted and notified.

UR 6.2 The Dashboard should provide a number of filters so that Users can limit the records that are returned. The following filters should be available:

- For CMA Users only. Trading Party, with a drop-down of Org Names for all orgs with MVI Users.
- MVI File Number.
- Transaction Type.
- Submitting MVI User.
- Created at Date (date picker range selection)
- MVI Status, being one of: Pending, Accepted, Completed, or Rejected.
- SPID
- Meter ID

UR 6.3 MVI File Information Results.

UR 6.3.1 When the page is loaded initially, the most recent messages should be displayed using the paging control; Users should be able to see the most recent 1000 messages by navigating between the different results pages.

UR 6.3.2 The following columns should be returned if there are any records that match the search criteria:

- Trading Party
- MVI File Number (as a hyperlink to view the messages that were included in the File: This will display another table of results, showing the following columns:
 - Created At
 - MID (hyperlink to view the Message details for the MID)
 - RMID (hyperlink to view the Message details for the RMID)
 - Message Type
 - Msg Count

UR 6.3.3 The Output files will have the following additional columns (in this colour):

T003.1 MID	Return Code	Return Code Message	T008.1 MID
SWBS100001988148	AR	SPID already registered to Applicant, or transfer to Applicant already pending.	
SWBS100001988149	OK		CMA000102327932 5

T005.1 MID	T009.0 MID	Return Code	Return Code Message
SWBS100001988148	CMA0001023284709	BZ	Meter Read must create a positive advance, not a zero advance.
SWBS100001988149	CMA0001023284710	OK	

T032.0 MID	T009.0 MID	Return Code	Return Code Message
AAAA10000198814 8	CMA0001023284709	AA	Sender must be the valid Licensed Provider.
AAAA10000198814 9	CMA0001023284710	OK	

UR 6.4 Export Options. A Button should be provided for a selected MVI File Number, to allow for 'Export' of that MVI File

UR 6.5 Default arrangements should apply.

Commentary: This extension to the LVI Dashboards allows MVI activity to be separately reviewed.

TP ASSESSMENT			
ASSESSMENT PROCESS			
ASSESSMENT START DATE	2022-08-09	ASSESSMENT END DATE	2022-08-10
IMPACT ASSESSMENT REQUIREMENT		IA REQUIRED	
CONSULTATION REQUIREMENT		TP CONSULTATION NOT REQUIRED	
ASSOCIATED DOCUMENTS (to this Part B)			
ASSESSMENT DETAILS			

CHANGE SPEC AND IMPACT (IF DIFFERENT FROM THAT ORIGINALLY SUBMITTED)	
CMA INTERNAL SYSTEMS IMPACT	
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	£95.9k (IA + 33%)
Benefit Estimate (L: < 10k, M: £10k to £100k, H: > £100k)	
TP DECISION	TP APPROVED
FINAL TP VIEWS	Unanimously approved on 18/8/22
PLANNED IMPLEMENTATION DATE	March 2023

WITHDRAWN BY PROPOSER?	No
COMMENTS	
DATE OF WITHDRAWAL	

COMMISSION APPROVAL	
DATE FINAL REPORT ISSUED TO COMMISSION	2022-11-16
APPROVAL STATUS	APPROVED CHANGE
DATE OF APPROVAL STATUS	2023-01-31
COMMISSION RESPONSE REFERENCE	

IMPLEMENTATION

IMPLEMENTATION DATE

Planned March 2023

IMPLEMENTATION DETAILS

(MC version, CSD versions, CMA Central Systems release number, etc.)

Market Code v50
CSD0301v 28
CSD0301 Annex v 29