

MARKET CODE CHANGE PROPOSAL			Draft Form Version 1.2	
Market Code Change Proposal Ref (Assigned by CMA)		MCCP 89	Version Number (Assigned by CMA)	C.1
Title of the change		Schema Changes for Validity		
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:	CMA	Org ID if assigned:		
Signature:		Date:	27/9/11	
		Name:	David Nicol	
Contact details for the Proposal - the contact should be able to deal with queries regarding this Market Code Change Proposal and need not be the same person who has countersigned the Change Proposal				
Name:		David Nicol		
Email Address:		david.nicol@cmascotland.co.uk		
Telephone and or Mobile:				
Number of Associated Documents	00	Name or link to documents		
If the MCCP will also affect the Operational Code, an OCCP must also be raised				
Indicate if there is an associated OCCP			OCCP Ref: CMA use only	
URGENT – IF PROPOSER HAS INDICATED THIS MCCP IS URGENT, STATE REASONS HERE The CMA Chief Executive will review this information and make a decision as to whether to take this MCCP forward as urgent as defined as under Market Code Part 8.7.1 (ii) (e)				
<p>The proposal is proposed as urgent, as unless changes are made, thousands of messages are likely to be lost between the CMA system and the Business Stream system. There are no impacts on LVI users.</p> <p>In accordance with Market Code Clause 8.9.1, the CMA CEO has determined that the revised process to be adopted for this urgent MCCP is as follows:</p> <ul style="list-style-type: none"> <li>• TP to consider the MCCP, returning any concerns or approval by the 5<sup>th</sup>. October 2011</li> <li>• The Commission is also invited to raise any concerns, including any associated with this process (as required by MC Clause 8.9.2), by the 5<sup>th</sup>. October 2011.</li> <li>• The work will be undertaken following this review, subject to no concerns being raised</li> <li>• The TP will be asked to ratify the earlier decision, at the 25<sup>th</sup>. TP to be held on the 20<sup>th</sup>. October 2011 and Commission approval will then be sought, subject to TP final approval.</li> </ul>				
2. MARKET CODE CHANGE PROPOSAL DETAILS				
A	ISSUE or DEFECT WHICH THIS MARKET CODE CHANGE PROPOSAL SEEKS TO ADDRESS required under Market Code Part 8.7.1 (ii) (b)			

## Background

Messages from the CMA to Trading Parties are sent via both the LVI and the HVI. For the avoidance of doubt, there are no issues with respect to messages sent to Trading Parties via the LVI.

Via the HVI, the CMA sends out packets of messages in an XML flow to the HVI users (currently only Scottish Water and Business Stream). Each XML flow can contain up to 1000 individual messages (such as a T009.0 or a T004.1). The entire XML flow must validate against the XML schema (CSD301 Appendix). Under the rules for schema validation, if the XML flow does not pass validation, the recipient can reject the entire flow and all the messages it contains, even if only one of the individual messages contained within the flow is invalid.

The CMA has been working with Business Stream to ensure complete delivery of HVI flows to Business Stream (compare for example CMAP125 for delivery in the September 3.1 release). There is currently a significant danger that improved Trading Party validation of CMA flows would lead to the wholesale rejection of a significant number of messages [thousands]. This would be completely unacceptable in respect of the operation of the market.

Additionally, it has been discovered that messages sent by Scottish Water since the March 2011 release do not comply with the schema insofar as the meter name contains a line feed – and these should also have been rejected.

## The Errors

Three classes of errors have been identified which relate to the individual messages which make up an XML flow:

- Errors in the T013.1
  - When Scottish Water send in a valid T013.0 flow with an empty address, the CMA sends out an invalid flow T013.1 without an address
  - When Scottish Water send in a valid T013.0 flow with no comment tag (as distinct from providing a comment tag with a zero length comment), the CMA sends out a T013.1 flow which is invalid because there is no comment tag.
- Errors with meter name validation (numerous flows)
  - A change at the last release attempted to make flows with meter names which contain “line feeds” invalid. The CMA implementation was flawed, and both failed to reject invalid incoming messages (primarily from Scottish Water), and then sent on invalid messages to Business Stream
- Errors with T019.0 and T020
  - The CMA sends out these messages to LPs when there is a change of LP. If the SIC code has not been set on the CS, then the messages which are sent out invalidly omit the SIC code.

## High Level Proposed Solution

The proposed solution is to make changes to the CS XML Schema which would make valid all these existing flows.

The ongoing issue in respect of line-feeds in meter names submitted by Scottish Water is not resolved by this change and will need to be considered at a later date; messages containing such meter names would be valid against the XML Schema.

## Detailed Change

The proposed change is therefore to make changes to the schema.

- T013.1
  - Make the address tag <MeterLocation> optional
  - Make the <D4003\_Comment> optional
- Meter Name Components
  - Completely reverse the schema change of March 2011 to the <D3001\_MeterId>, which introduced a regular expression restriction into the <D3001\_MeterId>. For the avoidance of doubt, the length restriction of 32 characters shall be reinstated into the D3001 field.
- T019.0/T020.0
  - Make the <D2008\_SICCode> tag optional

These changes should be implemented as soon as possible.

B	DESCRIPTION OF NATURE AND PURPOSE OF THE CHANGE AND HOW IT MEETS THE MARKET CODE OBJECTIVES AND PRINCIPLES FOR THE MARKET DOCUMENTS required under Market Code Part 8.7.1 (ii) (c)												
<p>The Proposer should indicate which principles the change supports and whether there is any adverse effect on any principle(s).</p> <table border="0"> <tr> <td>a) Proportionality</td> <td>e) Barriers to entry</td> </tr> <tr> <td>b) Transparency</td> <td>f) Customer contact</td> </tr> <tr> <td>c) Simplicity, cost-effectiveness and security</td> <td>g) Non-discrimination</td> </tr> <tr> <td>d) Non-exclusivity</td> <td>h) Not detrimental to Scottish Water's core functions</td> </tr> </table>		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				
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<p>Given the scale of the problem, the proposed solution is proportional, transparent and simple. It is not detrimental to SW's core functions; and does not impact upon the other principles.</p>													
C	IMPACT – required under Market Code Part 8.7.1 (ii) (d), (f) and (g)												
<p>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:</p> <table border="0"> <tr> <td>a) Central Systems</td> <td>c) CMA Interfaces/ Processes</td> </tr> <tr> <td>b) Trading Party's systems</td> <td>d) Trading Party's business processes</td> </tr> </table>		a) Central Systems	c) CMA Interfaces/ Processes	b) Trading Party's systems	d) Trading Party's business processes								
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<p>This change will impact validation on the CS, and the systems of both Scottish Water and Business Stream. It will allow packets of messages sent out by the CMA to properly validate on both the Scottish Water and Business Stream systems – and allow for complete delivery of messages from SW to the CMA, and from the CMA to Business Stream.</p> <p>Total cost: &lt;= £7448.84</p> <p>There are no impacts on LVI users.</p>													
D	DRAFT LEGAL TEXT – required under Market Code Part 8.7.1 (ii) (d)												
<p>Changes are proposed to</p> <p><u>CSD0301 – tables re the flows:</u></p> <table border="0"> <tr> <td>Transaction Number</td> <td>T013.1</td> </tr> <tr> <td>D4003 Text Comment Field</td> <td><u>RQOP</u></td> </tr> </table> <p>Meter names – <b>no changes</b> here to the CSD</p> <table border="0"> <tr> <td>Transaction Number</td> <td>T019.0</td> </tr> <tr> <td>D2008 SIC Code</td> <td><u>RQOP</u></td> </tr> <tr> <td>Transaction Number</td> <td>T020.0</td> </tr> <tr> <td>D2008 SIC Code</td> <td><u>RQOP</u></td> </tr> </table> <p><u>CSD0301A – tables re the flows:</u></p> <p>The detailed changes including the full schema will be incorporated and published.</p>		Transaction Number	T013.1	D4003 Text Comment Field	<u>RQOP</u>	Transaction Number	T019.0	D2008 SIC Code	<u>RQOP</u>	Transaction Number	T020.0	D2008 SIC Code	<u>RQOP</u>
Transaction Number	T013.1												
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<p>3. IMPLEMENTATION DETAILS - PROPOSED IMPLEMENTATION DATE OR LEAD TIME</p>													
<p>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.</p>													

The Implementation Date will be as soon as it can be developed by the CMA software provider, and implemented by both Scottish Water and Business Stream.

4. ANY OTHER COMMENTS

The full text of the objectives and principles for the Market 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/view\\_Directions.aspx](http://www.watercommissioner.co.uk/view_Directions.aspx))

PART B –TP ASSESSMENT				
1. ASSESSMENT PROCESS				
a.	ASSESSMENT START DATE	30/9/11	ASSESSMENT END DATE	5/10/11
b.	IMPACT ASSESSMENT REQUIREMENT	IA REQUIRED		
c.	CONSULTATION REQUIREMENT	TP CONSULTATION NOT REQUIRED		
d.	ASSOCIATED DOCUMENTS (to this Part B)			
2. ASSESSMENT DETAILS				
a.	CHANGE SPECIFICATION AND IMPACT			
As above				
b.	DRAFT LEGAL TEXT (if different from that originally submitted)			
As above				
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)			
Costs: As above			Benefits: As above	
3.	TP DECISION	APPROVED		
4.	FINAL TP VIEWS			
5.	PLANNED IMPLEMENTATION DATE			

WITHDRAWN BY PROPOSER?	NO
COMMENTS	
DATE OF WITHDRAWAL	

PART C – APPROVAL		
1.	DATE FINAL REPORT ISSUED TO COMMISSION	2011-10-21
2.	APPROVAL STATUS	APPROVED CHANGE
3.	DATE OF APPROVAL STATUS	2011-11-11
4.	COMMISSION RESPONSE REFERENCE	111111 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.)	