

MARKET CODE / OPERATIONAL CODE CHANGE PROPOSAL

Form
version 2.1

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

MCCP124

Version No.

D.1

PART A — SUBMISSION

A.1. GENERAL DETAILS

A.1.a. TITLE Integrating the POLR Process on the CS

A.1.b. COMPANY CMA

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 Neil Cohen

A.1.d. CONTACT NAME Neil Cohen CONTACT EMAIL;
TEL/MOB. Neil.cohen@cmascotland.co.uk
0117 942 3272

A.1.e. ASSOCIATED
MCCP / OCCP

A.1.f. ASSOCIATED
DOCS. Annex 1: Indicative User Requirements

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)

Currently the POLR process, as described in CSD 0003 is largely script based, involving CMA staff collating some information that is held by the CMA on bespoke files, as well as running scripts that provide the reports and make the updates to the CS that effect a transfer of SPIDs from an LP to one or more Providers of Last Resort.

This process requires a good deal of manual effort to ensure that all situations are correctly handled, and it takes considerable time to execute.

Furthermore, the Market Code and CSD0003 only specify the broad approach towards the allocation of SPIDs to Providers of Last Resort, missing a number of underlying limitations regarding the grouping of SPIDs.

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

This proposal undertakes to deliver a number of practical changes to the POLR process, all of which are considered to be consistent with the general intent of the current drafting in the Market Code and CSD0003 and which are also consistent with the execution of the POLR processes that have been undertaken to date.

In so far as the Market Code is concerned, the proposed drafting (see below) seeks to qualify the general approach of allocating SPIDs to Providers of Last Resort on a random basis (dividing SPIDs equally between such POLR LPs, so far as is practical), by also noting that;

- SPID pairs (WS SPIDs with associated SS SPIDs) should not be split and, therefore, should be allocated together to a POLR LP
- The CMA will use reasonable endeavours to identify SPIDs with the same customer (noting that the same customer can sometimes have slightly different D2027_Customer Names; for example, 'X.X. Customer LTD', 'XX Customer', or 'Customer') and allocate these together

CSD0003 will be amended (see below) to take account of the following;

- Transfers in to the LP that is exiting the market will be cancelled if such transfers have a Registration Start Date that is after the Designated Time for the POLR process. Otherwise, such transfers can simply be executed prior to the POLR allocations taking place.
- Transfers out from the LP exiting the market will be effected, but with a Registration Start Date set to the date of the Designated Time, where the RSD is after the Designated Time.
- The requirement for the POLR LPs to submit transfer reads will be made explicit in the CSD.

In order to give effect to the current arrangements, including the refinements identified above, in a more robust and efficient manner, the following CMA changes are also identified in this MCCP, as follows:

- Relevant LP registration details will be held on the CMA Centrals Systems (identifying which LPs are self-supply, specialist and which have opted out of the POLR process).
- The POLR allocation process will be undertaken on the CMA CS, rather than by use of bespoke scripts.
- The POLR Analysis Report will be available on the LVI, with information tailored as appropriate for the specific recipient (LPs, the CMA and SW).
- E-mails providing suitable updates to the process will be automatically generated by the CMA CS.

Principles and Objectives affected

PRINCIPLE	AFFECTED (Y/N)	DESCRIPTION
Proportionality	Y	Operation of the POLR process is simplified and made less time consuming.
Transparency	Y	Changes to MC/CSD drafting clarify the requirements and reporting via the LVI allows clear information provision.
Simplicity, Cost-effectiveness, and Security	Y	The proposal streamlines the CMA processing, reducing time and complexity.
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	Y	See below
CSDs	Y	See below
Wholesale Services Agreements	N	
Licenses	N	
CMA Central Systems	Y	POLR processing is brought on to the CMA CS.
CMA business processes	Y	Bespoke scripts and manual processing is no longer required.
Trading Party systems	N	
Trading party business processes	Y	Trading Parties may view POLR information on the LVI and export files from the LVI (in the same form as previously)

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

Market Code drafting should be as follows:

Section 5.3.6 (c)(4)

The particular POLR Supply Points allocated to each Licensed Provider shall be allocated on a random basis, subject to the following provisos; a) that where a Water Services Supply Point and an associated Sewerage Services Supply Point exist at a customer premises, they shall, so far as is practical, be allocated to one Licensed Provider and b) that where the Customer Names for a number of Supply Points are determined by the CMA to be sufficiently similar, all such Supply Points will be allocated to one Licensed Provider, so far as is practical.

CSD0003 drafting should be as follows:

New step b (with existing steps from b onwards re-numbered accordingly)

Step b Pending Transfers [T011.0, T011.1]

Any Supply Points for which a transfer is pending, to the Licensed Provider who has been issued with the Termination Notice, with a Registration Start Date that is after the Designated Time will be cancelled and the CMA will send a T011.0 (Notify Registration Cancellation) to that Licensed Provider and a T011.1 (Notify Registration Cancellation) to the Outgoing Licensed Provider.

Any Supply Points for which a transfer is pending, from the Licensed Provider who has been issued with a Termination Notice, shall be proceed as normal, except where the Registration Start Date is after the Designated Time, in which case, the transfer shall proceed with a Registration Start Date that is equal to the Designated Time.

New step c

Step c Submit Transfer Meter Reads [T005.0]

Water Services Supply Point which is Metered

For each Water Services Supply Point that is metered, the POLR Licensed Provider to whom the Supply Point is allocated will submit a Transfer Read to the CMA, using Data Transaction T005.1 (Meter Read), in accordance with CSD0202.

Sewerage Services Supply Point with a Related Water Supply Meter

For each Sewerage Services Supply Point with a Related Water Services Supply Point that is metered, the POLR Licensed Provider to whom the Supply Point is allocated will request the LP responsible for the Related Water Services Supply Point to submit a Transfer Read to the CMA, using Data Transaction T005.1 (Meter Read) and the Water Services LP will comply with any such request, in accordance with CSD0202.

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 2014 Release.

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

A.4. ANY OTHER COMMENTS

PART B — TP ASSESSMENT

B.1. ASSESSMENT PROCESS

B.1.a. ASSESSMENT START DATE	2014-01-08	ASSESSMENT END DATE	2014-02-20
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	Initial cost modelling suggests a cost of £35k
Benefit Estimate (L: < 10k, M: £10k to £100k, H: > £100k)	Benefit modelling suggests that the avoided effort for; running the POLR script, emailing, managing data updates and records, accommodating transfers, Party enquiries and liaison and provision of information delivers a benefit of: M.
B.3. TP DECISION	TP APPROVED
B.4. FINAL TP VIEWS	
B.5. PLANNED IMPLEMENTATION DATE	September 2014

WITHDRAWN BY PROPOSER?	No
COMMENTS	
DATE OF WITHDRAWAL	

PART C — COMMISSION APPROVAL

C.1. DATE FINAL REPORT ISSUED TO COMMISSION	2014-02-24
C.2. APPROVAL STATUS	APPROVED CHANGE
C.3. DATE OF APPROVAL STATUS	2014-03-21
C.4. COMMISSION RESPONSE REFERENCE	

PART D — IMPLEMENTATION

D.1. IMPLEMENTATION DATE	2014-09-18
D.2. IMPLEMENTATION DETAILS (MC version, CSD versions, CMA Central Systems release number, etc.)	
CMA CS v4.1	