

# MARKET CODE / OPERATIONAL CODE CHANGE PROPOSAL

Form  
version 2.2

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

**MCCP141**

Version No.

**D.1**

## PART A — SUBMISSION

### A.1. GENERAL DETAILS

A.1.a. TITLE Changes to Transfer (T) Meter Readings

A.1.b. COMPANY United Utilities Scotland

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 Mike Brindle

A.1.d. CONTACT NAME Mike Brindle CONTACT EMAIL;  
TEL./MOB. Mike.brindle@uuplc.co.uk  
07824 530208

A.1.e. ASSOCIATED  
MCCP / OCCP

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)

The incoming LP is responsible for obtaining a transfer (T) meter reading within +/- 2 BD's of the transfer date (RSD). However, there are occasions (possibly up to 10% of transfers) where it is not possible to obtain an actual T reading within the window.  
In these circumstances the only allowable option for the incoming LP is not to submit a T reading. There are no performance penalties for Missed T readings (although there are performance penalties for Late T readings). A practical alternative would be to enter an estimated T reading where it is sensible to do so.

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 change will;

1. Introduce a new category of S Read to identify such estimated T reads on the CMA CS, to be submitted by the Incoming LP.
2. Allow S readings to be used only in certain circumstances.
3. Widen the current T read window for such S reads to -2/+5 BD's
4. Capture the reason why an S read is being submitted
5. Report the number (and proportion) of S reads to T reads by LP

Having an accurate transfer read enables the incoming LP's starting read to align with the outgoing LP's closing read, giving a clear point of reference to the customer.

Having a timely T read allows the outgoing LP to close the customer's account within a reasonable timeframe (if a T read is not submitted, in theory the outgoing LP cannot finalise the customer's account). A transfer read should also reflect the allocation being made by settlements.

Extending the transfer window for S reads would enable more time to agree estimates and any remedial action between the outgoing and the incoming LP. Moving to +5 BD's should have a negligible impact in terms of delay in some final "closing" accounts being sent out and this should be balanced by less customer queries if both LPs are using the same transfer read.

The principal reasons why actual transfer readings cannot be obtained are:

1. Different meter found onsite to that registered at the CMA
2. Meters are inaccessible, or cannot be read (fogged glass etc)
3. No meter found onsite, but CMA shows active meter
4. No Access to premises/site

All of the above should trigger some form of corrective action by the incoming LP.

In addition, S reads should only be permitted if:

1. The incoming LP has made a reasonable attempt to read the meter.
2. The incoming LP intends to take action to resolve the situation (e.g. submitting a form K to Scottish Water to verify services, or a form F to repair a faulty meter).
3. The S read is calculated in accordance with the estimated advance approach described in CSD0207..

Any erroneous S reads can be corrected via the ERRRA process.

Performance standards will be not be altered.

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

PRINCIPLE	AFFECTED (Y/N)	DESCRIPTION
Proportionality	Y	
Transparency	Y	
Simplicity, Cost-effectiveness, and Security	Y	
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	The Market Code requires amending to allow estimated T readings
CSDs	Y	The following CSD's require amendment: 0102;0202;0203;0301
Wholesale Services Agreements	N	
Licenses	N	
CMA Central Systems	Y	1. New category of "S" read required 2. Reason Codes and Agreement Indicator. 3. Reporting requirements
CMA business processes	N	
Trading Party systems	N	

Trading party business processes	Y	Trading Parties will need to agree estimated T reads if no actual T read can be obtained by an Incoming LP.
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<p>A.2.d. DRAFT LEGAL TEXT Required under Market Code Parts 8.7.1 (ii) (d) and 8.8.1 (ii) (d)</p>
<p>The Market Code should be amended to include the following additional Section:</p> <p>5.9.1 A4 Each Transfer Read will always be taken by the physical reading of the register of the Scottish Water asset meter, except where the conditions defined in CSD0202 apply, when a Transfer Read may be substituted by an Estimated Transfer Read. The register of the Scottish Water asset meter shall provide the sole evidence of the quantity of water supplied.</p> <p>The Market Code should also be amended to include the following defined term:</p> <p>Estimated Transfer Read The Meter Read with Meter Read Type S provided to the CMA in accordance with CSD 0202 (Meter Read Submission: Process.</p> <p>CSD0102, CSD0201, CSD0202 and CSD0301 should be amended, as described in Annexes 2, 3, 4 and 5, respectively.</p>
<p>A.3. IMPLEMENTATION DETAILS</p>
<p>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.</p>
<p>March 2015</p>
<p>A.3.b. ANY LIMITATIONS OR DEPENDENCIES FOR IMPLEMENTATION</p>
<p>A.4. ANY OTHER COMMENTS</p>

## PART B — TP ASSESSMENT

### B.1. ASSESSMENT PROCESS

B.1.a. ASSESSMENT START DATE	2014-09-22	ASSESSMENT END DATE	2014-10-16
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)

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

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)	
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Cost Estimate	CMA Cost Modelling suggests a cost of £16k.
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Benefit Estimate (L: < 10k, M: £10k to £100k, H: > £100k)	
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B.3. TP DECISION	TP APPROVED
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B.4. FINAL TP VIEWS	
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B.5. PLANNED IMPLEMENTATION DATE	March 2015
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WITHDRAWN BY PROPOSER?	No
COMMENTS	
DATE OF WITHDRAWAL	

### **PART C — COMMISSION APPROVAL**

C.1. DATE FINAL REPORT ISSUED TO COMMISSION	2014-10-21
C.2. APPROVAL STATUS	APPROVED CHANGE
C.3. DATE OF APPROVAL STATUS	2014-11-04
C.4. COMMISSION RESPONSE REFERENCE	

### **PART D — IMPLEMENTATION**

D.1. IMPLEMENTATION DATE	2015-03-31
D.2. IMPLEMENTATION DETAILS (MC version, CSD versions, CMA Central Systems release number, etc.)	
CS Release 4.2 Market Code v27 CSD0102 v3.0 CSD0202 v4.0 CSD0203 v2.0 CSD0301 v8.0	