

MARKET CODE / OPERATIONAL CODE CHANGE PROPOSAL

Form
version 3.0

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

MCCP293

Version No.

D.1

PART A — SUBMISSION

A.1. GENERAL DETAILS

A.1.a. TITLE Deregistration Timescales

A.1.b. COMPANY Scottish Water

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 Richard Lavery

A.1.d. CONTACT NAME Richard Lavery CONTACT EMAIL; TEL/MOB. Richard.lavery@scottishwater.co.uk

A.1.e. ASSOCIATED MCCP / OCCP

A.1.f. ASSOCIATED DOCS. CSD0104 Part 1 (Maintain SPID Data)

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)

Deregistrations don't relate to physical disconnections (which are processed via the permanent or temporary disconnection process as appropriate) but to logical removals of Supply Points from the market because a property is no longer (or never was) an eligible premises.

The Market Code requires Scottish Water to update the Central Systems within 2 Business Days of undertaking a change of status (interpreted as being the effective date of the deregistration). This is a legacy of the introduction of the deregistration process many years ago when the existing KPI for disconnections has been applied to deregistrations because they use the same T15 transaction. Given that the change of status is initiated by the Customer and Scottish Water only become aware when either the Customer (via their LP) notifies us or the SAA update their records, the current Market Code KPI will very rarely be achievable – reflected in the 4% CMA audit compliance rate. It's also worth noting that if SW initiate a deregistration, process 31 of the Operational Code requires us to give the LP 20 Business Days' notice before processing the transactions – making achievement of the Market Code 2 Business Day target impossible for any changes which SW identify via updates at the SAA.

Over time, individual changes to CSD0104 and the Operations Code have had the unintended consequence of inconsistent and/or ambiguous descriptions of the milestones and timescales within CSD0104 and between CSD0104 and the Operational Code.

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 wording of CSD0104 Part 1 would be updated to clarify Scottish Water's reasonable obligations for deregistered SPIDs and to align with the provisions of the Operational Code.

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

PRINCIPLE	AFFECTED (Y/N)	DESCRIPTION
Proportionality	N	
Transparency	Y	Provides clarity on Scottish Water's deregistration obligations
Simplicity, Cost-effectiveness, and Security	N	

Non-exclusivity	N	
Barriers to Entry	N	
Customer Contact	N	
Non-discrimination	N	
Non-detrimental to SW Core Functions	N	
MC / OC OBJECTIVES		

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	Y	CSD0104 changes
Wholesale Services Agreements	N	
Licenses	N	
CMA Central Systems	N	
CMA business processes	Y	Audit tests will need updated
Trading Party systems	N	
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)	
See attached Annex 1 mark up of CSD0104 Part 1.	
If changes are identified for CSD0301 Data Transaction Catalogue Annex, these will not be provided in this MCCP, but will be provided following the deployment of the associated system updates. This is because the majority of CSD0301 Annex is system generated automatically and can only be updated after associated changes have been incorporated into the relevant system.	

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.
2023-03-24
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	2023-02-01	ASSESSMENT END DATE	2023-02-16
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 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. CUSTOMER IMPACT (TO BE COMPLETED BY LPS)			
No customer impact as this change relates to a Scottish Water obligation in relation to deregistered premises.			
B.2.e. 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)	none
Cost Estimate	n/a
Benefit Estimate (L: < 10k, M: £10k to £100k, H: > £100k)	
B.3. TP DECISION	TP APPROVED
B.4. FINAL TP VIEWS	Unanimously approved at the TP on 2023-02-16
B.5. PLANNED IMPLEMENTATION DATE	2023-03-24

WITHDRAWN BY PROPOSER?	No
COMMENTS	
DATE OF WITHDRAWAL	

PART C — COMMISSION APPROVAL

C.1. DATE FINAL REPORT ISSUED TO COMMISSION	2023-03-06
C.2. APPROVAL STATUS	APPROVED CHANGE
C.3. DATE OF APPROVAL STATUS	2023-03-17
C.4. COMMISSION RESPONSE REFERENCE	

PART D — IMPLEMENTATION

D.1. IMPLEMENTATION DATE	2023-03-23
D.2. IMPLEMENTATION DETAILS (MC version, CSD versions, CMA Central Systems release number, etc.)	
CSD0104 Part 1 v22	