



WATER ACT 2003
WATER SUPPLY LICENSING

Customer transfer protocol

November 2005

Customer transfer protocol

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1. Introduction

1.1 Background

The Water Industry Act 1991 (WIA91)¹ will permit a company that is the holder of a Water Supply Licence (referred to in the customer transfer protocol as a licensee) to have access² to a water undertaker's³ supply system⁴ to enable the licensee to supply water to eligible premises. Prospective licensees will have to obtain a Water Supply Licence before they can supply water through a water undertaker's supply system in competition with the water undertaker. Our guidance on the licence application process sets out the process and the information we will require from an applicant.⁵ Prospective suppliers can apply for either of the following:

- A **retail licence** – a Water Supply Licence that authorises the holder to use a water undertaker's supply system for the purpose of supplying water to the premises of its customers ('the retail authorisation'). A retail licence therefore permits the supplier to purchase a wholesale supply of water from a water undertaker and to retail it to customers at eligible premises.⁶
- A **combined licence** – a Water Supply Licence that gives the holder the 'supplementary authorisation' in addition to the retail authorisation. The supplementary authorisation allows the holder to introduce water into a water undertaker's supply system by means of which any particular supply of water to the premises under the licensee's retail authorisation is to take place.⁷

1.2 Purpose of the customer transfer protocol

There are no express provisions in WIA91 prescribing a process for the transfer of customers between suppliers. However, we recognise that for the competitive market to function effectively, a clear, simple and standardised transfer process is essential to ensure that customers can easily change supplier in a timely and effective manner and take advantage of the benefits of competition. Such a process also ensures that essential customer information is exchanged between water undertakers and licensees.

¹ In the customer transfer protocol, references to WIA91 refer to WIA91 as amended by Water Act 2003 (WA03) once the relevant provisions have been brought into force.

² The term 'access' refers both to wholesale supplies of water by a water undertaker to a licensee for the purpose of the licensee's making a retail supply of water to the premises of the licensee's customer, and to combined supplies (the introduction by the licensee of water into the water undertaker's supply system in order to make a retail supply of water by the licensee to its customer through the water undertaker's supply system).

³ A 'water undertaker' is a company appointed under section 6 WIA91 to provide water services in respect of a defined geographic area of England and Wales.

⁴ A water undertaker's supply system is defined in section 17B(5) WIA91.

⁵ The licence application process is part of 'The Water Supply Licence (Application) Regulations 2005' and 'Applying for a Water Supply Licence Guidance'.

⁶ See sections 17A(1), (2) and (4) WIA91.

⁷ See sections 17A(5) and (6) WIA91.

This document is the customer transfer protocol (CTP) and explains the process and procedure that water undertakers and licensees must follow when a customer transfers all or part of its supply of water from a:

1. water undertaker to a licensee;
2. licensee to a water undertaker; or
3. licensee to a licensee.

Under condition of appointment S and standard licence condition 6, water undertakers, on which we formally serve the CTP, and licensees have an obligation to comply with all aspects of this CTP and will be able to manage its development.

The following principles are critical to ensuring the success of the customer transfer process:

- It is scaleable, adaptable and expandable to accommodate changes to the eligibility threshold.
- It is appropriate for the level of competition and represents best value.
- The solution does not involve major changes to water undertakers' and licensees' existing IT systems. The system comprises a simple database with communication between water undertakers and licensees via electronic files using Internet-based technology.
- Each primary water undertaker will provide a registration system for the customer transfer process, holding data on its customers at eligible premises within its area of appointment. This is a register of information on its customers that have transferred supplier via the CTP.
- The customer transfer process needs to be simple, seamless and indiscernible to the customer.
- There is a standard definition of the data which supports the registration system that will be expanded from time to time. A data dictionary will define the information and a data standard used for communication between market participants. It is compatible with existing data standards used within the water industry. Data definitions need to be maintained in order to support the process and the communication medium associated with the exchange of this information.
- The acquiring new supplier will drive the process, as they will be initiating the transfer of the eligible customer.
- The primary water undertaker will maintain current details of all meters for which it is responsible.
- Data flows will be sent to and from the primary water undertaker and the other market participants. This provides clearly defined responsibilities, should be easy to audit and allows for appropriate monitoring and interrogation on the number and status of customer transfers.
- There will be a formal CTP change management process that will include details of the process for initiating change, implementing change and an appeals mechanism.
- As licensees and water undertakers have the responsibility to develop, own and manage the CTP, there needs to be a structure in place to allow all market participants to have input to maintenance and changes to the CTP.

1.3 Structure of the customer transfer protocol

This CTP is structured as follows:

- Chapter 2 outlines the assumptions of the CTP.
- Chapter 3 defines the customer transfer process and explains the steps for exchanging the ten key data flows to transfer a customer.
- Chapter 4 sets out the purpose of the data dictionary and explains its requirement in the CTP process.
- Chapter 5 outlines the maintenance of the registration system in the CTP and explains the lock-out period for customer registration. It also sets out the involvement of customers and explains that sewerage undertakers must be kept informed within the CTP and that they should receive data flows where necessary for billing purposes.
- Chapter 6 sets out the timescales that water undertakers and licensees must follow when transferring a customer.
- Chapter 7 explains the objection rules that enable a customer transfer to be blocked.
- Chapter 8 explains the rejection rules that prevent a transfer from proceeding in specific circumstances.
- Chapter 9 outlines customer transfer operational issues that set out the resolution of erroneous transfers and disputed transfer meter readings. It describes the process for maintaining and updating customer details. It also explains that codes of practice may need to be developed in order to facilitate operational activities to run smoothly in the wider market and identifies the types of codes of practice that may be required.
- Chapter 10 recognises the need for change management and defines the role of a CTP forum, its purpose, funding and voting arrangements.
- Chapter 11 explains the terms used in the CTP set out in a glossary.
- Appendix 1 contains flow charts illustrating the customer transfer process with and without the instance of an objection.
- Appendix 2 contains the data dictionary.

2. Assumptions of the customer transfer protocol

The CTP supports the transfer of customers at eligible premises from a water undertaker to a licensee, a licensee to a water undertaker or from a licensee to a licensee.

The CTP is based on each water undertaker providing a registration system for customers at eligible premises within its area of appointment. For effective customer transfer, the following assumptions apply:

- The CTP will only take effect when access agreements are in place between the water undertaker and the new supplier.
- The new supplier will gather customer details (for eligible premises) before starting the transfer process. The CTP does not require confidential customer data to be transferred, thus minimising any Data Protection Act⁸ issues.
- Although licensees and water undertakers are obliged respectively by standard licence condition 6 and conditions of appointment S to comply with the CTP, responsibility for registering eligible premises will rest with the relevant primary water undertaker.
- The transfer process will include an objection mechanism. However, objections may already have been resolved at the time the water undertaker and licensee make an access agreement and/or could be covered within the termination provisions of any existing contractual arrangements with the customer.
- The new supplier will be obliged to obtain any meter readings required to support the customer transfer and distribute the readings to the water undertaker which in turn sends the readings to the sewerage undertaker. However, water undertakers may provide ongoing metering services under the terms of their access agreements.
- The new supplier is responsible for identifying eligible premises. The primary water undertaker will only register and maintain details of eligible premises once those premises have successfully transferred via the CTP.
- Data will be held against each eligible premises (which will be given a unique premises reference number) rather than individual metering points.

⁸ Data Protection Act 1998.

3. Transfer process

The customer transfer process contains ten data flows. Five of these data flows relate to the core transfer process and five relate to the process that enables the old supplier to object to a transfer. The full list of data within each data flow is set out in the data dictionary in appendix 2. The ten data flows are as follows:

- DF001 – Request to register a change of supplier.
- DF002 – Confirmation or rejection of a change of supplier.
- DF003 – Notification of a change of supplier.
- DF004 – Notification of the metering and premises details.
- DF005 – Meter reading.
- DF006 – Notification of an objection to a change of supplier.
- DF007 – Confirmation or rejection of a notification of an objection to a change of supplier.
- DF008 – Removal of an objection to a change of supplier.
- DF009 – Notification of a removal of an objection.
- DF010 – Confirmation of a registration objection.

Figure 1: Customer transfer process showing data flows where there are no objections to the transfer

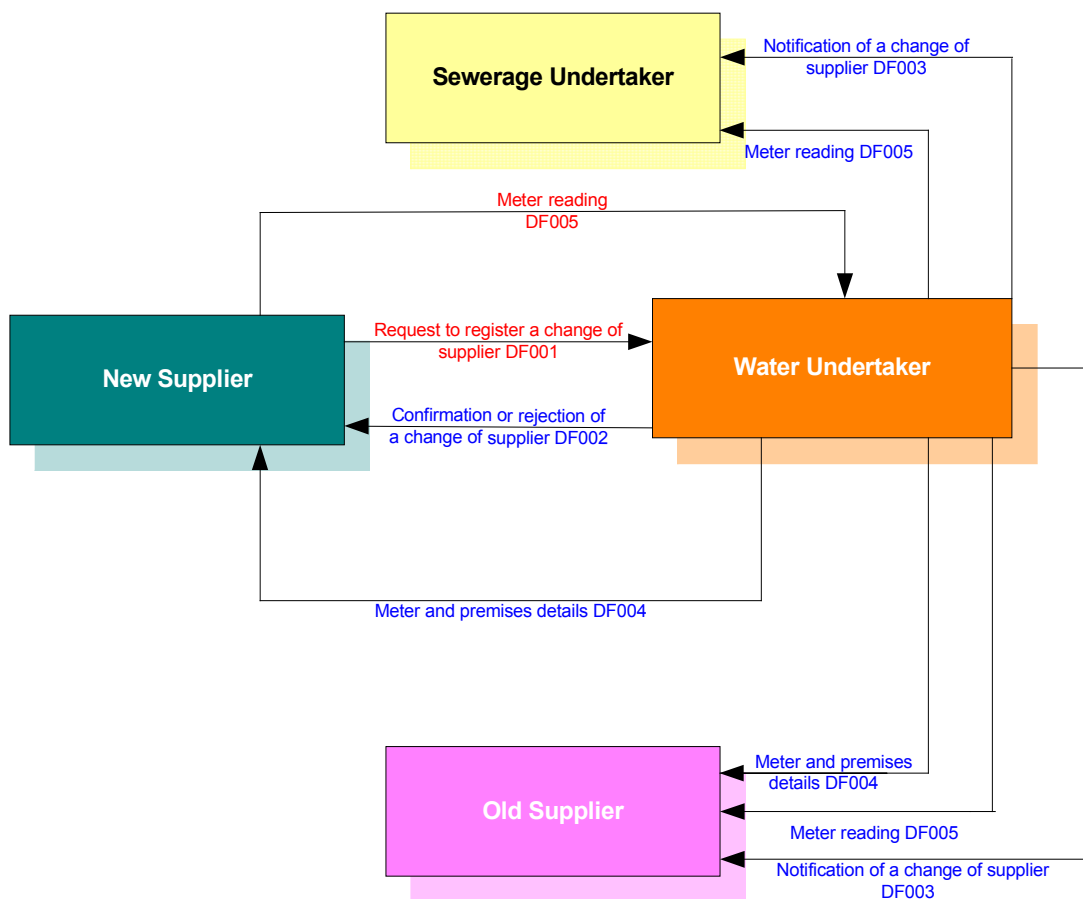


Figure 1 shows customer transfer where there are no objections and involves only five data flows. It demonstrates who processes each data flow and to whom each data flow should be sent.

The general validation of data flows and the details of mechanisms to support data exchanges have been extensively reviewed. It is recognised that as the process is relatively simple with minimal data flows, systems using standard templates sent via e-mail will be effective. The option to automate the processes in the future will be available to market participants if the data structures are adhered to, therefore making the registration system scalable.

Each step of the customer transfer process is described below. Relevant market participants should acknowledge transmission and receipt of a data flow. This can be done automatically by e-mail.

3.1 Process description

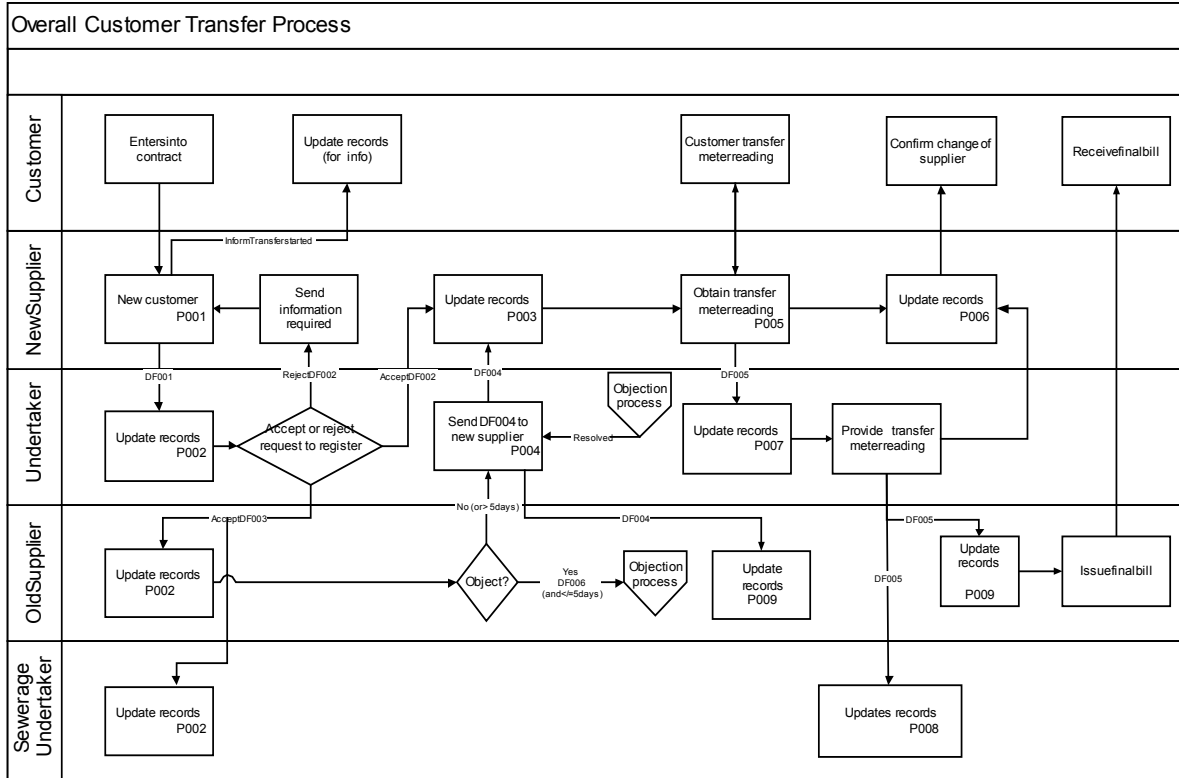
The CTP has been designed to contain the minimum number of individual processes and data exchanges. Each process (designated P001 to P017) is linked to the next by a data flow (DF001 to DF010).

For the purposes of the process description, the terms 'new supplier' and 'old supplier' have been used to identify the new and existing water suppliers of the eligible premises and could refer to a licensee or a relevant primary water undertaker.⁹

The 'swim lane' diagram in figure 2 shows the whole CTP and each market participant's actions within it.

⁹ The water undertaker in whose area of appointment the customer's eligible premises is located.

Figure 2: Customer transfer process identifying the role of each market participant



DF001 Request to register a change of supplier
 DF002 Confirmation or rejection of a change of supplier
 DF003 Notification of a change of supplier
 DF004 Notification of the metering and premises details
 DF005 Meter reading
 DF006 Notification of an objection to a change of supplier

Process P001 – New customer (new supplier)

The new supplier enters into an agreement with the customer and is responsible for obtaining the premises and associated billing details, along with the identities of the old licensee and primary water undertaker. The premises reference number (PRN)¹⁰, created as part of the access agreement, should be gained to identify the premises. This is a new and unique number that will be generated by the water undertaker (unique across all water undertakers) to the agreed format in the data dictionary and included in the data flow.

Data field WD12 (premises reference number) is an eight alphanumeric field with the first three characters identifying the water undertaker (ANG = Anglian Water through to YKY = Yorkshire Water) coupled with a unique five-digit number for each eligible premises.¹¹

To register the new customer, a DF001 (request to register a change of supplier) must be sent to the primary water undertaker. This data flow contains information

¹⁰ Unique number assigned to an eligible premises for the purpose of identifying premises that are transferring within the CTP.

¹¹ A full list of water undertakers and their respective three character ID codes is in Appendix 2.

about the transfer, including the premises address, the PRN, the number of meters on the premises and the date on which the transfer is to take place (which is likely to have been agreed in advance when the licensee and the water undertaker negotiate the access arrangement).

For eligible premises that are 'co-located premises'¹², the DF001 should contain all the above information for each building on the site.

The new supplier must notify the customer that the transfer process has started. It should also keep the customer informed of the progress of the transfer.

Process P002 – Update records (primary water undertaker)

On receipt of the DF001, the primary water undertaker will validate any supplied PRN, premises address(es), number of meters and old supplier ID and the primary water undertaker checks the information against that held in their registration system.

If there are any errors with the data in accordance with the rejection rules, the primary water undertaker will report back via a DF002 (confirmation or rejection of a change of supplier) and the DF001 should be re-sent with the corrected details.

If no errors are found, the DF002 will be sent with a code indicating that the requested registration (change of supplier) has been accepted.

The primary water undertaker will send a DF003 (notification of a change of supplier) including details of the PRN, premises address and transfer date, to the old supplier and the sewerage undertaker for information.

Process P003 – Update customer records (new supplier)

If the details in the DF001 (request to register a change of supplier) are correct, the new supplier will receive confirmation of a change of supplier via a DF002 from the primary water undertaker. Both should record the information, the new supplier in its internal system and the primary water undertaker in its registration system.

Process P004 – Provide meter and premises details (primary water undertaker)

Following despatch of a DF003 (notification of a change of supplier), the primary water undertaker will identify the customer from the PRN and/or premises address(es) and, provided no objections¹³ have been received within five working days, send the associated meter details (eg, meter serial numbers, meter type, meter size) and additional premises information (eg, business type, special consumer) to the new supplier and old supplier within a DF004 (meter and premises details).

¹² See our guidance on eligibility for further information.

¹³ See chapter 7 on objection rules and P010 to P017 for the objection process.

Where eligible premises have multiple meters, the meters will be indicated in the DF004 data flow and completed data fields will be provided for each meter.

Process P005 – Obtain CTP meter reading (new supplier)

Once the primary water undertaker has confirmed the change of supplier and notified the old and new supplier of the meter and premises details, the new supplier obtains an actual meter reading for each meter at the eligible premises within a five day window (two working days either side of the transfer date). The new supplier sends the meter reading to the primary water undertaker which in turn sends the same reading(s) to the old supplier and sewerage undertaker via a DF005 (meter reading) within the defined timescales set out in the CTP. This ensures that all parties have an agreed meter reading and that the opening and closing bills will be consistent with the meter reading. Meter readings must be given in whole units.

If a meter reading is not obtained within the specified five day window, the old supplier has the option to proceed with the disputed transfer meter reading process.

The obligation for obtaining the meter reading is the responsibility of the new supplier. However, the new supplier may make arrangements for the meter reading to be undertaken by the primary water undertaker, the customer or some other service provider. Where another party is acting on behalf of the new supplier, it is appropriate for the customer to be notified who will be reading the meter.

In addition, it should be noted that section 205 WIA91 provides for the sharing of meter readings, so that sewerage undertakers will continue to receive meter readings of customers that have transferred for the purpose of billing. Standard licence condition 5 also requires licensees to inform sewerage undertakers of any premises connecting to the distribution system for the first time, so that they can bill the new customers and connect them if necessary.

Responsibility for meter maintenance remains with the water undertaker, even after a transfer has taken place. Access agreements will define the procedures that water undertakers and licensees will need to follow during planned and unplanned supply system maintenance, including meter installation and essential repairs.

Process P006 – Update customer records (new supplier)

Customer records must be updated with the meter and premises details on receipt of the DF004. After this has been received, the new supplier should update its records with the actual meter reading sent in the DF005.

Process P007 – Update customer records (primary water undertaker)

The primary water undertaker receives a DF005 (meter reading) from the new supplier and updates its registration system. This includes producing the final bill to the old supplier and the establishment of a new wholesale account for the new supplier.

Process P008 – Update customer records (sewerage undertaker)

The sewerage undertaker receives the DF005 (meter reading) from the primary water undertaker and updates its internal systems.

Process P009 – Update customer records (old supplier)

The old supplier receives the DF004 and DF005 from the primary water undertaker and updates its internal systems.

Transfer processes P001 to P009 always occur. Processes P010 to P017, however, only occur in the event of an objection being raised.

When an objection is withdrawn and the primary water undertaker sends a DF004, the transfer process will restart from P004 (provide meter and premises details). Where an objection has not been cleared but the new supplier still wishes to continue with the transfer, the new supplier must restart the transfer process from P001. This can only be done after having first resolved the reason for the initial objection.

Objection process

The objection process has been designed to complement the transfer process. The rules for objection are set out in chapter seven of the CTP. The rules and objection process allow for the old supplier to raise objection(s) to the proposed transfer within five working days following receipt of the DF003 (notification of a change of supplier).

To minimise inappropriate transfers, the onus is on the new supplier to resolve an objection. Therefore, once raised there are five working days to resolve or withdraw the objection. The objection will be upheld unless withdrawn within the CTP objection resolution period. If the objection is not cleared within the set time period, the customer transfer will be stopped and the new supplier will need to restart the process having first resolved the reason for the initial objection.

The outline objection process is shown in figure 3.

notification of an objection to a change of supplier) and the DF006 should be re-sent with corrected details.

Alternatively, the objection may be rejected if it was not received within the objection period (five working days of receipt of the DF003). The transfer process will continue once the primary water undertaker issues a DF007 (rejection of a notification of an objection to a change of supplier) and a DF004 (meter and premises details).

If no errors are found and the objection was raised within the correct time period, the primary water undertaker will record the objection on its registration system and despatch a DF007 (confirmation of a notification of an objection to a change of supplier) to both the old supplier and new supplier with a code indicating that an objection has been received.

Process P012 – Resolve an objection (new supplier)

On receipt of a DF007 (confirmation or rejection of a notification of an objection to a change of supplier), the new supplier will identify the customer from the PRN and update its internal systems accordingly.

If the new supplier believes the objection should not have been raised, it should liaise directly with the old supplier during the CTP objection resolution period to resolve the issue. This will result in either the objection being upheld or the old supplier agreeing to withdraw the objection.

In the event of a raised objection not being resolved satisfactorily, either supplier could refer the dispute to us for determination. Depending on the outcome, market participants may need to consider any billing adjustments and/or backdating of the transfer.

Process P013 – Removal of an objection (old supplier)

Where the old supplier agrees to withdraw its objection, it will send a DF008 (removal of an objection to a change of supplier) to the relevant primary water undertaker and update its internal system.

Process P014 – Update customer records (primary water undertaker)

On receipt of a DF008 (removal of an objection to a change of supplier) from the old supplier, the primary water undertaker will verify whether the objection withdrawal was received within the CTP objection resolution period.

If the removal of an objection to a change of supplier is accepted, the primary water undertaker will remove the notification of an objection to a change of supplier (DF006). The registration of the new supplier will restart. The new supplier will be responsible for the supply of water to the eligible premises from the transfer date in its original request to register change of supplier.

The primary water undertaker will notify both the old supplier and the new supplier of the removal of the objection via a DF009 (notification of removal of objection), and continue the process by issuing a DF004 to the new supplier and the old supplier.

The primary water undertaker should monitor the objection resolution period. If this five working day period passes without the objection being withdrawn or where the request to withdraw the objection has been rejected, the primary water undertaker should inform the old supplier, the new supplier and the sewerage undertaker that the old supplier should retain responsibility for the eligible premises via a DF010 (confirmation of a registration objection).

For audit purposes all market participants should keep a record of objections raised, in particular the reason for the objection and the outcome.

Process P015 – Update customer records (old supplier)

On receipt of either a DF009 (notification of a removal of an objection) DF010 or (confirmation of a registration objection), the old supplier should update its internal systems.

Process P016 – Update customer records (new supplier)

On receipt of either a DF009 or DF010, the new supplier should update its internal systems. In the event of the objection being withdrawn and, after receipt of a DF004 from the primary water undertaker, the CTP will proceed to process P004 (provide meter and premises details). Where an objection has not been cleared within the set timescales but the new supplier still wishes to continue with the transfer, the new supplier will need to restart the process having first resolved the reason for the initial objection.

Process P017 – Update customer records (sewerage undertaker)

On receipt of a DF010, the sewerage undertaker should update its internal records accordingly such that the old supplier shall retain responsibility for the water supply to the eligible premises.

4. Data dictionary

The data dictionary supports the customer transfer process. It defines the information and data standards that must be used when communicating transfer information. Using standard terms minimises the risks of transfer difficulties arising from poor quality or missing data.

The content and format of the data set out in the data dictionary are based on those currently used within the water industry, and has been developed by us in conjunction with the Technical Advisory Group¹⁵ (TAG) and its CTP sub-group.¹⁶

The data dictionary defines the core data set to support the transfer process and comprises:

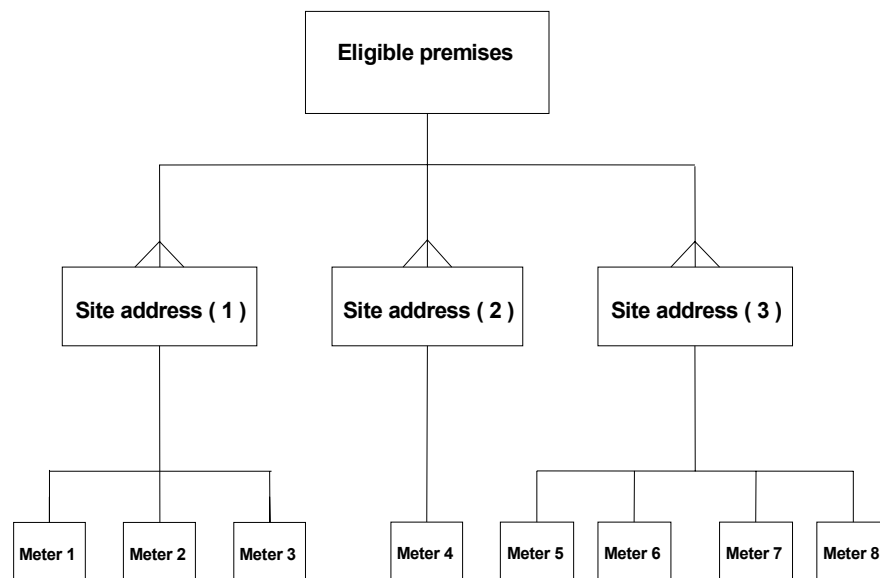
- market data;
- data flow definitions; and
- data fields.

Market data is the set of data on organisation identification of market participants required to ensure interoperability.

A data flow is a logical flow of information between market participants and is defined in terms of its constituent data fields.

Data fields are the individual items of data that are transferred as part of the CTP. Examples include meter readings, eligible premises address, and the PRN.

Figure 4: Illustration of the relationship between eligible premises, multiple premises addresses and multiple meters in the CTP



¹⁵ The industry advisory group set up to advise on and take forward the technical implementation of the water supply licensing policy.

¹⁶ The sub-group of the industry advisory group, made up of water undertakers, potential licensees and Ofwat that has extensive experience of customer transfer in the gas and electricity industries.

The data dictionary supports the relationship between eligible premises, multiple premises addresses (which can arise due to the definition of premises in our eligibility guidance) and multiple meters, as illustrated in figure 4.

Any proposed changes to the data dictionary will only be made following consultation with and approval by market participants in accordance with the CTP change management process set out in chapter 10 of the CTP.

To support the transfer process, the exchange of data needs to occur in accordance with agreed communication media, which need:

- standard file formats and protocols irrespective of the method of communication;
- a level of system security;
- file identification and numbering;
- clarity as to how confirmation of files sent/received will be recorded;
- a file rejection process and a process for remedial follow up; and
- areas for manual intervention.

This will be achieved by Microsoft Excel spreadsheets with Visual Basic validation to ensure that the correct information populates the data fields within each data flow as specified in the data dictionary at appendix 2.

5. Maintaining the transfer registration system

Every primary water undertaker will be responsible for managing customer transfers within its area of appointment. As part of this, every primary water undertaker will maintain a registration system of customers at eligible premises that have transferred. Every primary water undertaker and licensee will require a computer with Internet access and appropriate software with which to support the electronic transfer of information and adhere to the key CTP principles.

Communication between water undertakers and licensees using data flows will take place with standard Microsoft Excel spreadsheets sent via e-mail. Headers and footers in the spreadsheets will assist in identifying the data flow and checking data, thus reducing timescales.

In addition to allowing data to be sent and received, the registration system will:

- allow for the number of customer transfers to be monitored;
- demonstrate compliance and understanding of the CTP; and
- ensure consistency of functionality, application and maintenance of data.

5.1 Changes and updates

Changes and updates to the transfer registration system are described in the process on maintaining and updating customer details in section 9.3.

5.2 Customer involvement

The customer must be informed by the new supplier that the transfer process has started and should be informed of the progress of the transfer. This should help to reduce the occurrence of erroneous transfers.

5.3 Sewerage undertakers

Although the CTP does not involve the sewerage undertaker sending any data flows, it will continue to receive meter readings from a new supplier in accordance with section 205 WIA91.

However, it is recognised that new arrangements may have to be agreed where the water and sewerage undertakers are different and where other specific arrangements may exist, such as with trade effluent.

5.4 Concurrent registrations and registration periods

Where a customer transfer registration has been made, the primary water undertaker will apply a 'lock out' period 20 working days before the customer transfer supply start date. This allows for successful registrations to be completed and prevents further registration attempts. Registrations may be made no more than 30 working days and no less than 20 working days before the transfer date. This will not apply

where an erroneous transfer or a change in the customer's premises has occurred and the customer is returning to the original supplier or the primary water undertaker (which may also be the original supplier). A customer transfer will also be rejected if there is already a valid transfer in progress from an alternative supplier.

6. Timescales

Customer transfers should be completed within relatively short timescales, given that the access terms will be negotiated before the start of the CTP. The CTP timescales are consistent with those currently used for customer transfers within the gas and electricity industries.

All timescales are expressed in working days, which for the purposes of the despatch/receipt of data flows are defined as 8.00 am to 6.00 pm. Therefore, a data flow despatched or received before 6.00 pm would be deemed to have been despatched/received on day one, but if despatched or received after 6.00 pm this time would be deemed to have been despatched/received on day two.

The request to register a change of supplier (DF001) should be submitted to the primary water undertaker who may begin to process the DF001 no less than 20 working days (day minus 20 or D-20) or no more than 30 working days in advance of the transfer.

The date of transfer may fall on a weekend or public holiday. Where the date of transfer is on a non-working day, then the transfer process must be started at least 20 working days before that date.

The confirmation or rejection of a change of supplier (DF002) should be issued by the primary water undertaker within a further three days (on D-17) with the notification of a change of supplier data flow (DF003) being sent at the same time.

The old supplier will then have five working days to issue a notification of an objection to a change of supplier (D-12) and a further five working days from receipt of the notification (objection resolution period) within which the objection could be removed (D-6).

Where an objection is removed (or no objection is raised), the primary water undertaker will have a further three working days to issue the notification of metering and premises details (DF004) to the new and old suppliers (D-2). The new supplier would be expected to obtain the meter reading(s) within a two-day window either side of the transfer date and process this reading(s) within a further three working days (D+5).

The proposed timeframe both in terms of elapsed time from the start of the transfer and in relation to the transfer date (D) is set out in table 1.

Table 1: CTP transfer timetable

| Data flow | Elapsed time | Timescale |
|---|---------------------|------------------|
| Request to register a change of supplier (DF001) | 1 | D-20 |
| Confirmation or rejection of a change of supplier (DF002) | 4 | D-17 |
| Notification of a change of supplier (DF003) | 4 | D-17 |
| Notification of an objection to a change of supplier (DF006) | 9 | D-12 |
| Confirmation or rejection of a notification of an objection (DF007) | 10 | D-11 |
| Removal of an objection to a change of supplier (DF008) | 15 | D-6 |
| Notification of a removal of an objection (DF009) | 16 | D-5 |
| Confirmation of a registration objection (DF010) | 16 | D-5 |
| Notification of metering and premises details (DF004) | 19 | D-2 |
| Meter reading (DF005) | 26 | D+5 |
| Meter reading window | | D±2 |

7. Objection rules

Old suppliers are entitled to raise an objection to a customer transfer in certain circumstances. Sewerage undertakers are not able to object to a customer transfer. Circumstances where an objection might be made are in the specific circumstances of debt, where a valid contract exists for the supply of water, and where co-operative or customer-requested objections occur.

The old supplier may object to a transfer where the charges for water supplied to the customer have been demanded in writing (in an invoice for payment) by the old supplier and have remained owing for more than 30 days at the time of processing the registration request. To allow the transfer to continue, we propose that where possible an agreement could be made to allow the debt to be assigned to the new supplier (in effect the old supplier is paid by the new supplier). In these circumstances the new supplier would need to agree such arrangements with both the customer and old supplier.

Where transfers occur between water undertakers and licensees, the assignment of debt could form part of the access agreement.

A co-operative objection can also be made. These have been put to good effect within the gas and electricity industries and reduce the occurrence of erroneous transfers. Co-operative objections will occur when the new supplier acknowledges that it has submitted a request to register change of supplier in error and the old supplier then agrees to raise an objection to prevent the transfer proceeding and thus preventing erroneous transfer.

The reasons for objection are:

- charges for water supplied that have been invoiced for payment and are owing to the old supplier for more than 30 days at the time of the registration request; or
- the customer is being supplied by the old supplier under a contract which will neither expire nor be terminated on or before the proposed transfer date; or
- the new supplier has contacted the old supplier and both suppliers have agreed that the new supplier's registration has been made in error (a 'co-operative objection'); or
- the customer at the premises has advised the old supplier that it has not entered into a contract with the new supplier (a 'customer requested objection').

8. Rejection rules

Primary water undertakers can also prevent a transfer from taking place in specific circumstances. These are referred to as 'rejections'. Rejections can be raised where:

- incorrect or missing data is provided such as 'sending organisation ID not recognised', 'file was addressed to wrong organisation', or 'file is empty or records could not be read';
- there is no access agreement in place, or where the start date of the access agreement is inconsistent with the date of transfer;
- the transfer date is more than 30 or less than 20 working days from transfer registration (DF001); and
- a customer transfer is already in progress by an alternative supplier.

When a registration request is rejected as a result of the water undertaker's intervention, the customer transfer ceases. However, it can be restarted once the data is corrected or an appropriate access agreement is put in place.

9. Customer transfer operational processes

As far as possible, the CTP has been designed to minimise disputes and avoid transfers that should not occur. However, it is prudent to have processes in place should these instances happen. In conjunction with stakeholders, we have developed operational processes to resolve the following issues:

- erroneous transfers;
- disputed transfer meter readings; and
- maintenance of key standing customer data critical to successful future customer transfers.

If other issues are identified, further processes can be developed by the industry.

9.1 Erroneous transfer process

9.1.1 Purpose of the erroneous transfer process

This process sets out the procedure available to licensees and water undertakers to resolve erroneous transfers (ETs). An ET occurs where a customer has been transferred under the CTP in error. An ET may occur in the following circumstances:

- proven forgery or mis-selling;
- incorrect customer details;
- cancelled contract not actioned; and
- misleading information/suspected improper marketing practice.

Table two sets out the reasons for an ET, with a definition and typical business scenario for each.

Table 2: Table setting out the reasons for erroneous transfer

| Code | Reason for ET | Definition | Typical Business Scenarios |
|-------------|--|--|--|
| PF | Proven forgery or mis-selling | Where an ET is proven to be the result of fraudulent marketing practices by the new supplier or its employee or agent | <ul style="list-style-type: none"> • Forgery of contract |
| IC | Incorrect customer details/PRN selected | Where an ET is recorded in circumstances where the customer's premises has been incorrectly identified | <ul style="list-style-type: none"> • The customer premises details include a site address that is not part of the premises • Wrong PRN keyed in |
| CC | Cancelled contract not actioned | Where an ET is recorded because the new supplier failed to act upon the valid cancellation of the contract by the customer | <ul style="list-style-type: none"> • Data input error • If internal systems show that the customer had previously contacted the supplier and validly cancelled the contract |
| MI | Misleading information/suspected improper marketing practice | Where an ET is recorded due to the provision of misleading information by the new supplier or its employee or agent; or duress by the employee or agent or the provision of misleading information | <ul style="list-style-type: none"> • Customer or customer's authorised representative claims that the customer did not know that he was signing a contract • Customer claims that the agent was very aggressive and the customer feared that not signing the contract could have repercussions • Customer has found out that savings quoted by the agent were not accurate and they do not want to proceed • Customer claims that the agent said the contract was no more than a request for information • Customer claims that the agent came to read the meter and then asked the customer to sign the contract |

9.1.2 Scope and objectives

The scope of the process is limited to errors at transfer and covers the following situations:

- new supplier identifies a potential erroneous transfer;
- customer believes that it has been erroneously transferred and contacts the new supplier; and
- customer believes that it has been erroneously transferred and contacts the old supplier.

There is a specific timeframe for raising an ET of two billing periods plus one month. The time restrictions for raising an ET are therefore:

- three months for monthly billed customers; and
- seven months for quarterly billed customers.

There are circumstances where it may be impracticable to raise ETs within the time restrictions identified. In these circumstances, if the affected suppliers wish to use the CTP to resolve an ET, they should feel free to do so under a bilateral informal agreement.

A principle of this process is that the old supplier will endeavour to take the customer back, depending on whether they have a subsisting contract. However, it is recognised that in some instances, such as where the customer's contract with the old supplier has since expired, the old supplier and the customer would have to agree new terms and conditions.

The scope of the ET process does not extend to the resolution of disputed billing issues.

9.1.3 Procedure for raising an erroneous transfer

The objective of the ET process is to establish channels of communication between suppliers so that issues can be resolved. The process supports this by establishing common reasons for an ET and sets out best practice.

Where an ET is identified within the objection period, the old and new supplier should try to resolve it by raising a co-operative objection.

Only the new supplier can raise an ET on its own behalf, stating the reason why the transfer has taken place. However, a customer can tell either supplier if it believes it has been erroneously transferred. If the customer's initial contact is with the old supplier, then it should also be encouraged to contact the new supplier.

The ET process may also be used where the new supplier agrees to return a customer to the old supplier on a goodwill basis under the category of 'customer adamant not under contract'.

Registration of the customer to the wrong supplier for prolonged periods must be avoided as far as possible.

i) Determine requirement and initiate the erroneous transfer process

Where the customer believes it has been erroneously transferred, it may contact either the new or old supplier. If the contacted supplier believes that the transfer is erroneous, it should discuss this with the customer and initiate the ET process on the customer's behalf.

The new supplier may also initiate the ET process on its own behalf where it recognises that it has transferred a customer in error.

Where the initiating supplier is the new supplier, it should make reasonable endeavours to initiate the ET process by sending the DF020 (notification of an erroneous transfer) to the old supplier within eight working days of receipt of notification of a potential ET.

Where the initiating supplier is the old supplier, it should make reasonable endeavours to initiate the ET process by sending the DF022 (notification of an erroneous transfer) to the new supplier within two working days of receipt of notification of a potential ET.

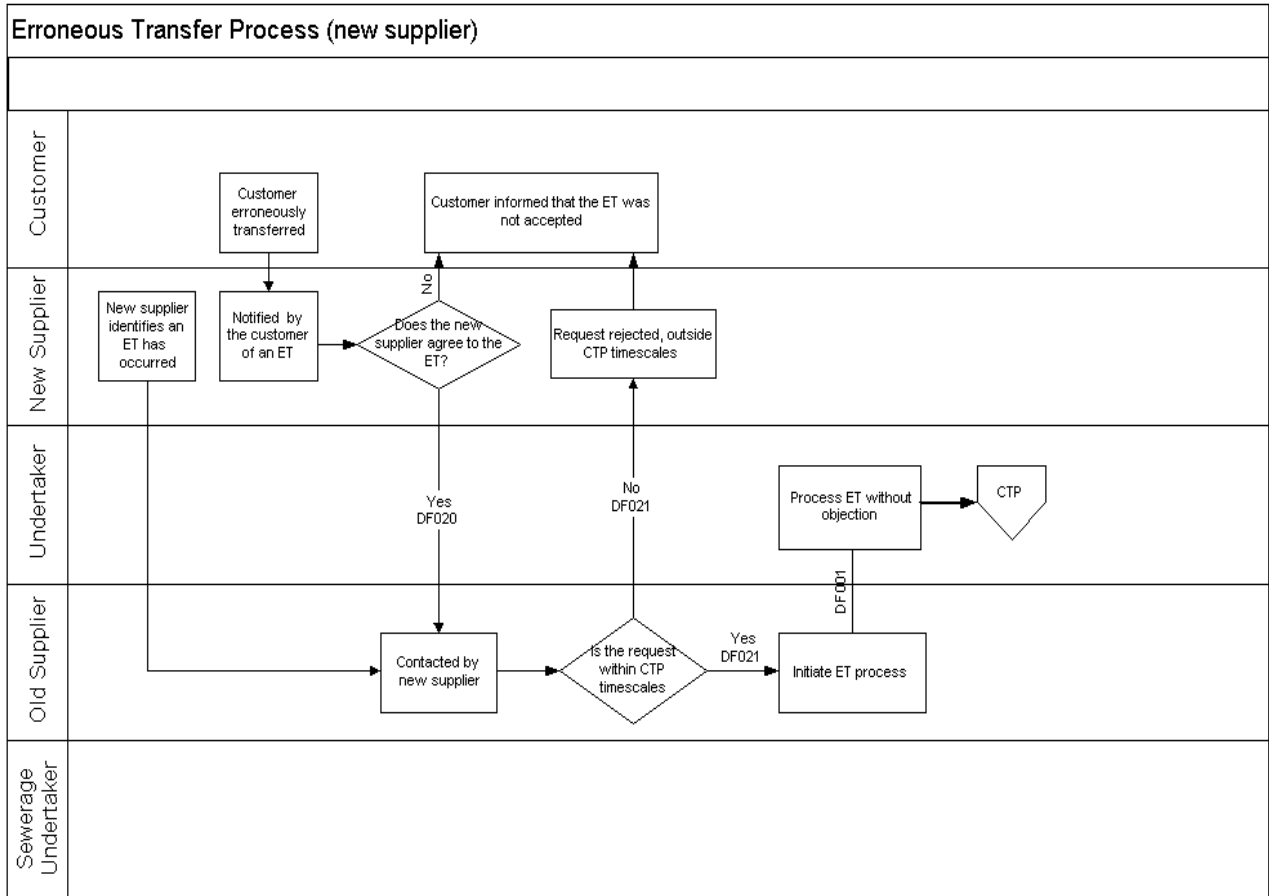
The initiating supplier should send the DF020 or DF022 (notification of erroneous transfer) to the other supplier using the CTP registration system. The data flow should include the PRN(s) believed to have been erroneously transferred and provide a reason why it is an ET. Where the initiating supplier is the old supplier, it should provide the reason given by the customer. The identity of the other supplier may be determined from information provided by the customer or by contacting the primary water undertaker. The initiating supplier should inform the customer within five working days of the initial contact that it believes an ET has taken place and the actions being taken to resolve the ET.

ii) Proposed course of action acceptable to both suppliers

Where both suppliers agree that the customer is to be returned to the old supplier and the initiating supplier is the new supplier, the following process applies:

- within two working days of receipt of the initial request, the old supplier should return the DF021 to the initiating supplier with data item 'status of erroneous transfer' marked 'E' – accepted by the old supplier,
- within ten working days of the initial request having been returned to the new supplier with the data item 'status of erroneous transfer' marked 'E' – accepted by old supplier, the old supplier should submit a DF001 to re-register the customer,
- where the old supplier does not accept the initial request, it should return the DF021 to the initiating supplier data item 'status of erroneous transfer' marked 'I' – rejected by the old supplier,
- where such a customer transfer request is invalid, the old supplier should use reasonable endeavours to re-submit a valid customer transfer request as soon as possible thereafter.

Figure 5: The ET process where the customer contacts the new supplier



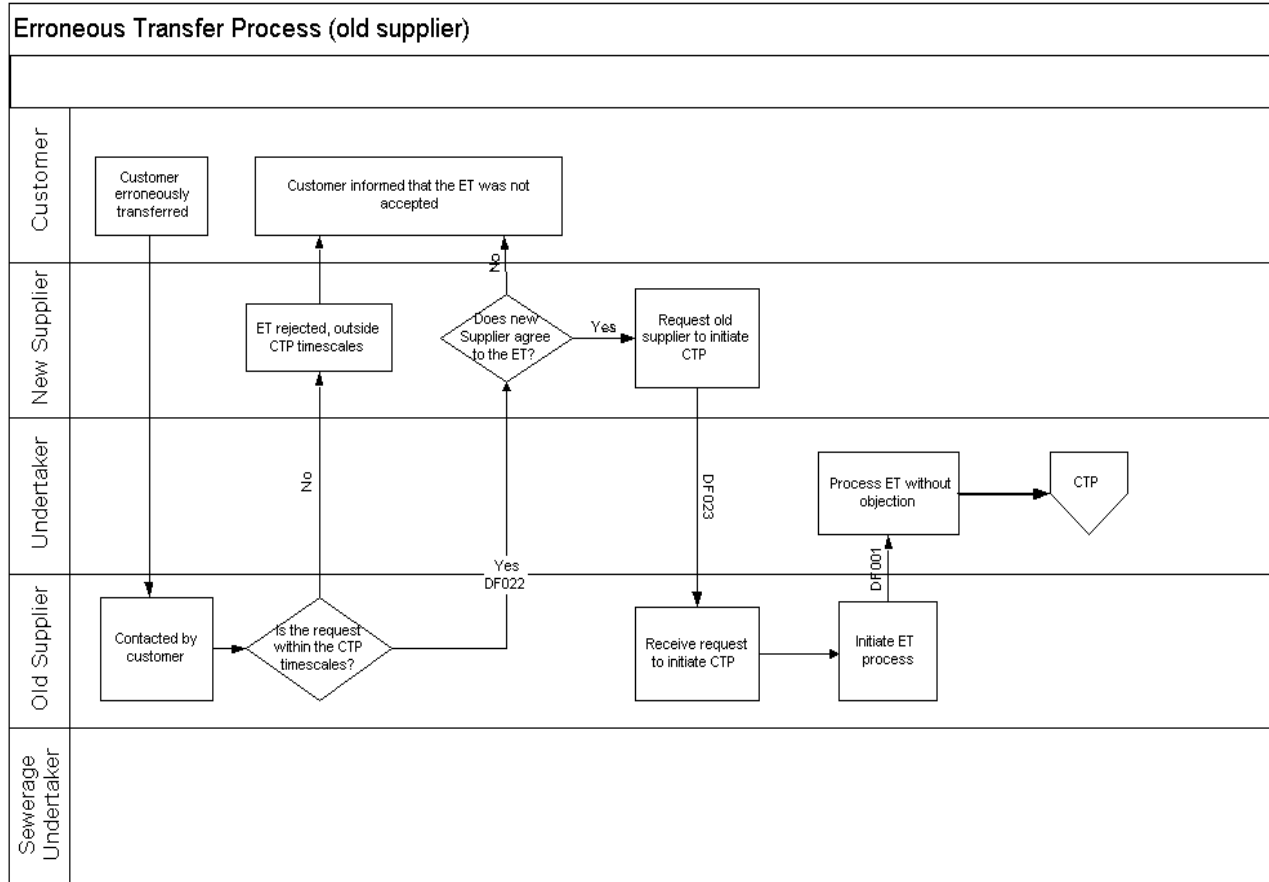
Where the initiating supplier is the old supplier, the following process applies:

- within eight working days of receipt of the initial request, the new supplier should return the DF023 to the initiating supplier with the data item 'status of erroneous transfer' marked 'B' – accepted by new supplier,
- the initiating supplier should within ten working days of having received the DF023 from the new supplier with the data item 'status of erroneous transfer' marked 'B' – accepted by new supplier, submit a customer transfer request DF001 to the primary water undertaker to re-register the customer,
- where the new supplier does not accept the initial request, it should return the DF023 to the initiating supplier data item 'status of erroneous transfer' marked 'I' – rejected by the new supplier,
- the initiating supplier shall, where such an application for registration is invalid, use reasonable endeavours to re-submit a valid application for registration as soon as possible thereafter.

Where the new supplier agrees that an ET has taken place, the new supplier should **not object** to the re-registration of the relevant customer by the old supplier.

Unless it has already done so, within 20 working days of their initial contact, the initiating supplier should provide the customer with confirmation that it should expect to be returned to its old supplier via the ET process.

Figure 6: The ET process where the customer contacts the old supplier



9.1.4 Recommended timings

Table 3: Erroneous transfer timetable where the new supplier is the initiating supplier

| Action | Phase | Timing |
|---|--|---|
| New supplier sends initial request | Determine requirement and raise ET | Within eight working days of initial customer contact |
| Old supplier responds to initial request | Contact between involved suppliers to agree course of action for ET resolution | Within two working days of initial request |
| Process starts to return customer to old supplier | Request old supplier to initiate CTP using DF001 | Within ten working days of initial request |

Table 4: Erroneous transfer timetable where the old supplier is the initiating supplier

| Action | Phase | Timing |
|--|--|---|
| Old supplier sends initial request to new supplier | Determine requirement and raise ET | Within two working days of initial customer contact |
| New supplier responds to initial request | Contact between involved suppliers to agree course of action for ET resolution | Within eight working days of initial request |
| Process starts to return customer to old supplier | Initiate CTP using DF001 | Within ten working days of initial request |

9.2 Disputed transfer meter reading process

9.2.1 Purpose of the disputed transfer meter reading process

This is a process for resolving disputed transfer meter readings. It relates to disputed readings at customer transfer only, but can be developed to produce a code of practice for post-transfer disputes.

Experience of competition in electricity and gas shows disputed transfer meter readings to be very time-consuming and require expensive administrative resources. The following process has therefore been created to minimise uncertainty and the potential for disputed transfer meter readings.

9.2.2 Scope and objectives

The customer or the old supplier can raise a dispute. The customer can raise a dispute with regard to closing bills from the old supplier, opening readings or the first post-transfer bill from the new supplier. The old supplier can raise a dispute with regard to closing bills.

Any dispute by the primary water undertaker (where it is not the old supplier) is outside the scope of this process. However, we acknowledge that the primary water undertaker may legitimately dispute readings, but these should be resolved separately and bilaterally.

Similarly, in the unlikely event of a sewerage undertaker disputing a meter reading, that dispute should be pursued through the primary water undertaker outside the scope of this process.

To minimise disputes and the time spent on resolution, the below points should be followed:

- All readings taken on transfer should be 'actual' readings, taken where possible by the new supplier. If the new supplier has a problem accessing the meter, then the customer can read the meter. However, the customer reading should be an 'actual' reading taken within two working days either side of the transfer date. If no 'actual' reading is obtained within the timescales then market participants should begin the disputed transfer meter reading process.
- Estimates should only be used as a last resort to resolve disputed meter readings and should be calculated in accordance with an agreed methodology that is to be developed by the industry.
- Any dispute should not delay the transfer. The transfer should proceed irrespective of disputed reading issues.
- To reduce liquidity risks, all market participants should pay the undisputed amount of any disputed invoices (actual or estimated) within their contract credit period terms. Disputes should be reconciled separately.
- Reasonable endeavour should be made to raise a dispute within five working days of suspecting the transfer reading is in error. The new supplier should remind customers that it is in their interest to raise a dispute within 30 working days of discovering the possible error to enable it to be resolved.

- Any market participant involved in a dispute must provide evidence (historical consumption, changes in production patterns etc) to support its position.
- This process does not provide for meter changes, which will be covered by a separate operational code of practice. However, where meters are suspected of being faulty, they should be replaced. Consumption until the time of replacement should be estimated and, where appropriate, added to the actual consumption recorded by the new meter reading on installation when raising the next meter reading (and bill).
- The process includes an escalation process if disputes cannot be resolved.
- All timescales are expressed in working days, which for the purposes of the despatch/receipt of calculating timescales in this process are defined as 8:00 am to 6:00 pm. Therefore, a data flow despatched or received, or a meter reading taken prior to 6:00 pm would be deemed to have been despatched/received or taken on day one. A data flow despatched or received, or a meter reading taken after 6:00 pm would be deemed to have been despatched/received or taken on day two. Working days exclude weekends and bank holidays.

9.2.3 Dispute process

Meter reading disputes can arise in several circumstances, set out in the figures below. The circumstances are not exhaustive. Market participants will need to adapt approaches to actual circumstances, provided that they keep to the process. They should pay particular attention to the formal dispute process with its use of standard data flows.

Figure 7: The disputed transfer meter reading process initiated from the final bill from the old supplier

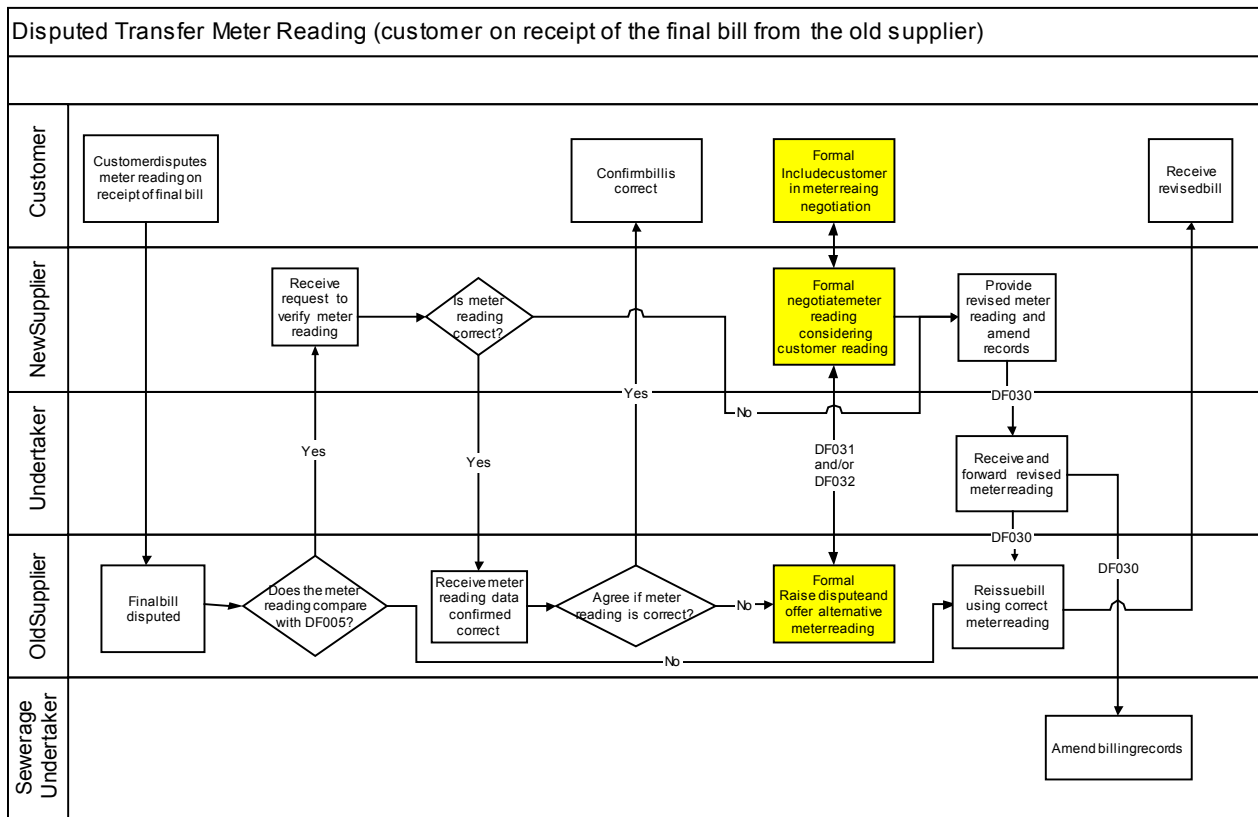


Figure 8: The disputed transfer meter reading process initiated from the final bill from the new supplier

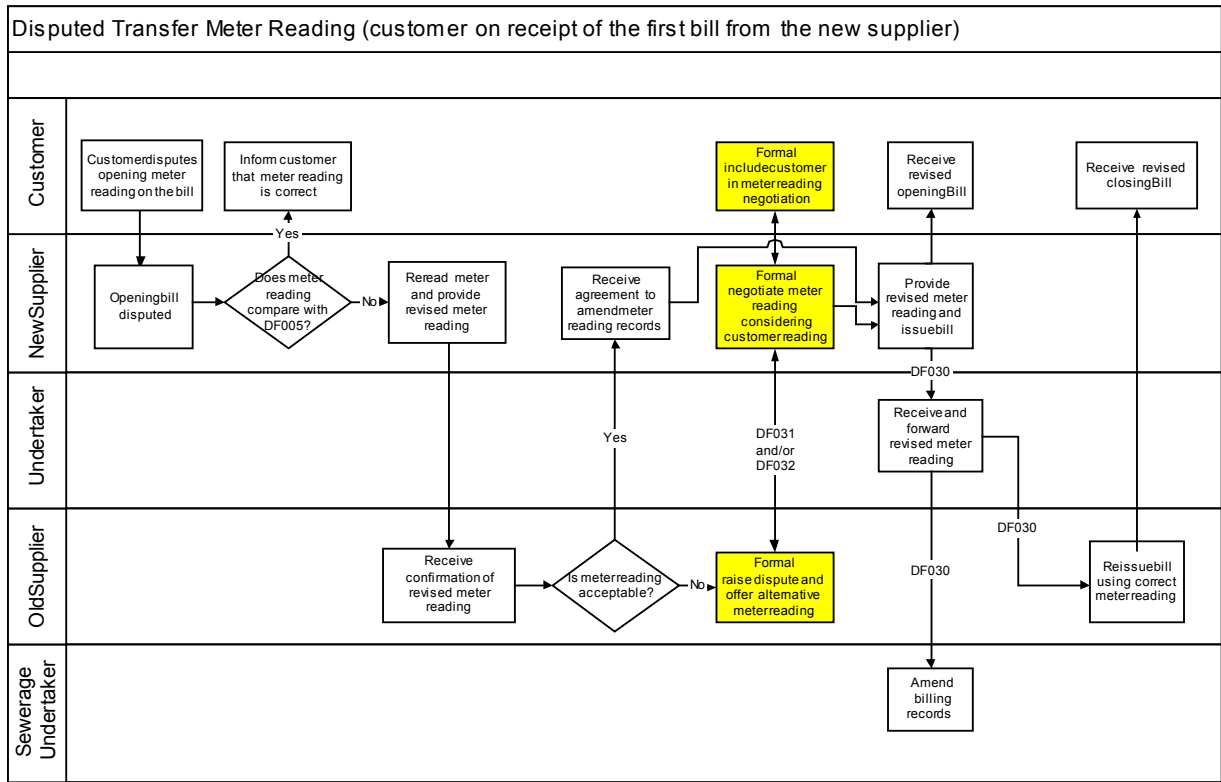
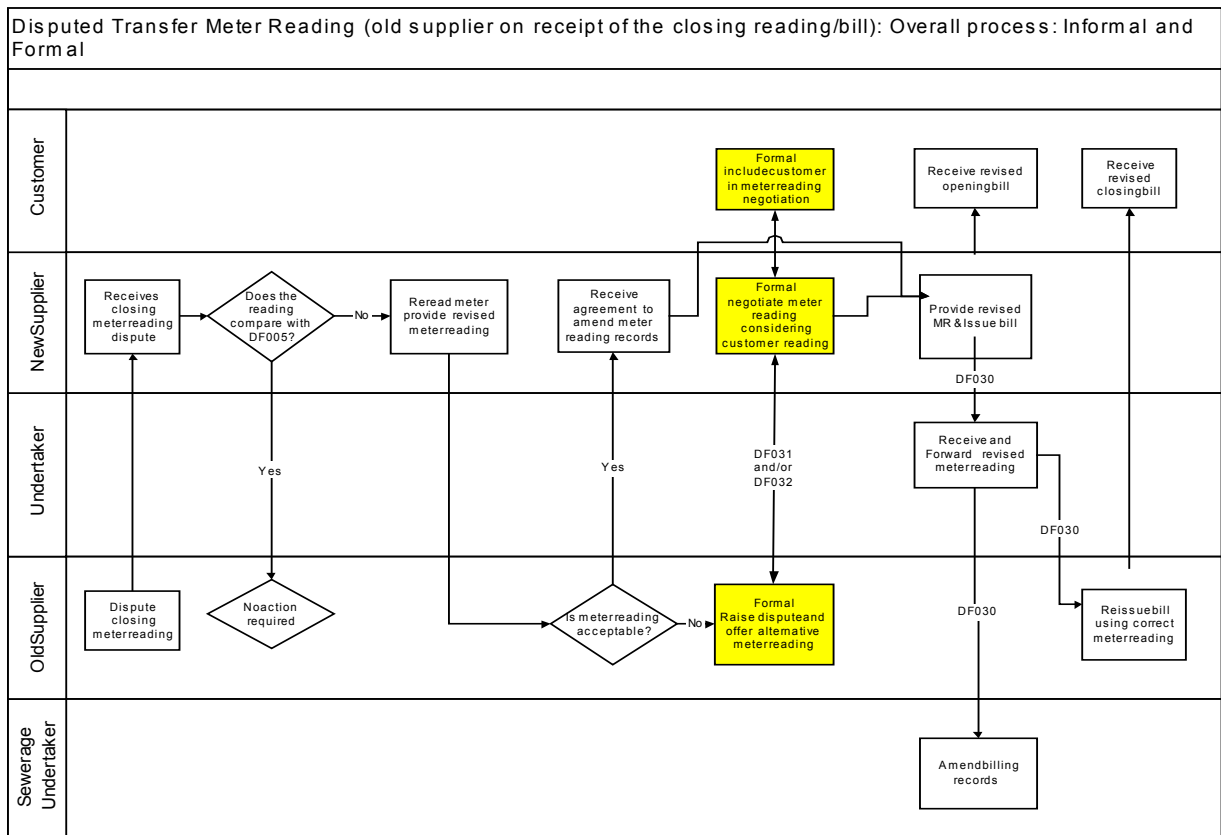


Figure 9: The informal disputed transfer meter reading process



We have set out two levels of dispute resolution as follows:

i) Informal dispute process

Market participants should first attempt to resolve disputes informally by telephone or e-mail. Many disputes may arise out of clerical or transposition errors or erroneous readings and may be quickly resolved.

All market participants should publish and keep updated a list of contact telephone numbers and e-mail addresses for initial queries.

Suppliers should respond to such approaches within two working days, but where a revised meter reading is involved this may be extended to five working days (provided they have informed the other supplier that a further meter reading will be made).

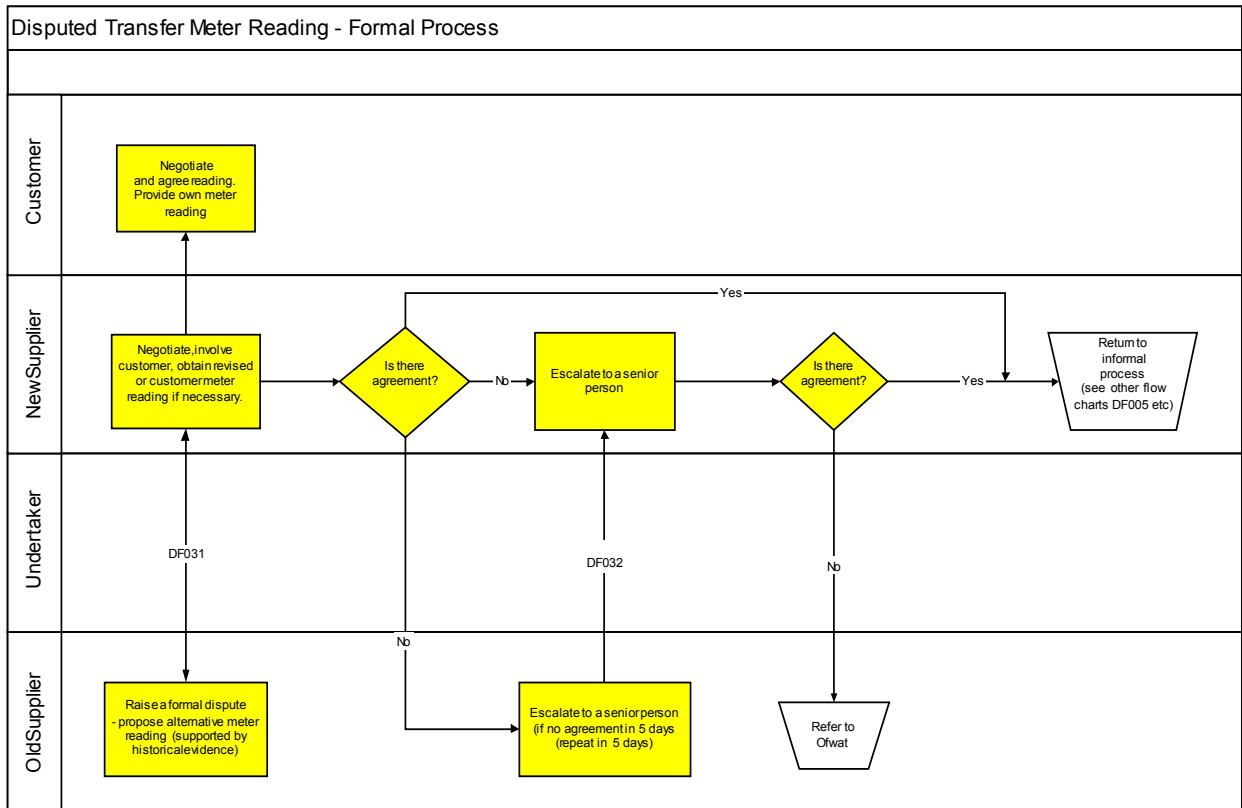
All market participants should maintain a register of informal disputes. This should include such details as volumes, key dates and resolution status. Even if the old supplier is not directly involved in any dispute, the new supplier should always consult with the old supplier if it proposes any changes to an existing reading.

As a general procedural principle, where new readings are finally agreed in informal and formal disputes, both suppliers should update their records. The new supplier should immediately send a DF030 (notification of agreed revised meter reading) to the primary water undertaker. The primary water undertaker should then send the DF030 to the old supplier and sewerage undertaker within two working days. All market participants concerned should review their billing records and issue any appropriate revised bills.

Table 5: The disputed transfer meter reading process for informal disputes

| Informal disputes | | | |
|---------------------------|---|---|------------------------|
| Who | Reason | Period (all working days) | Condition |
| Customer/old supplier | Raise initial dispute | Ideally within five and no later than 30 days after discovery | Recommended |
| New supplier/old supplier | Responding to queries: <ul style="list-style-type: none"> • Basic • following a meter reading | Two days Five days | Mandatory Mandatory |
| Old supplier | Trigger to raise formal dispute with DF031 if no response to query | Five days | Mandatory |

Figure 10: The formal disputed transfer meter reading process



ii) Formal dispute process

Where there is failure to resolve a dispute informally within five working days of the old supplier sending out a query or proposed alternative reading, the old supplier should raise a formal dispute. This is shown in figure 10 above.

The old supplier should send a DF031 (formal notification of a disputed transfer meter read) to the new supplier. This contains details of the relevant PRN, the meter whose reading is being disputed, and a proposed alternative reading with supporting evidence.

The new supplier should consider the proposal and consult with the customer. If appropriate the customer may provide its own reading. Alternatively, estimated readings can be considered. The new supplier should respond to any DF031 within five working days.

If no agreement is reached within five working days of sending the DF031, the old supplier should send a DF032 (escalation of disputed transfer meter reading) to a senior person at the new supplier. If no agreement is reached within a further five working days (ten days after DF031), the old supplier should send a second DF032.

If there is no agreement within 15 working days of sending the DF031, the old supplier should refer the dispute to us and notify the new supplier by issuing a third and final DF032.

All market participants should publish a list of contact telephone numbers and e-mail addresses for formal disputes, including senior contacts for escalated disputes, and keep the list updated. They should also maintain a register of formal disputes, including details on volumes, key dates and resolution status.

Formal dispute negotiations should be conducted by telephone or e-mail, via the nominated individuals of both the old and new supplier.

When agreement is reached, the new supplier should immediately send a confirmatory DF030 (notification of agreed revised meter reading) to the primary water undertaker, who then must send it on to the old supplier and sewerage undertaker within two working days. All parties concerned should review their billing records and issue any revised bills.

If a faulty meter is suspected, any party can request a meter replacement within a target request period of ten working days. An estimated transfer reading should aim to be agreed, and notification provided on the agreed reading, in accordance with this process.

Table 6: The disputed transfer meter reading process for formal disputes

| Formal disputes | | | |
|--|---|-----------------------|------------------|
| Who | Reason | Period | Condition |
| Old supplier/new supplier | To attempt to resolve after DF031 | Five days | Recommended |
| Old supplier | Trigger to send 1st DF032 if no resolution | Five days after DF031 | Mandatory |
| Old supplier | Trigger to send 2 nd DF032 if no resolution | Ten days after DF031 | Mandatory |
| Old supplier | No resolution. Trigger to send 3 rd DF032 and refer to Ofwat | 15 days after DF031 | Mandatory |
| Old supplier/new supplier/primary water undertaker | Change meter | Ten days | Recommended |
| Primary water undertaker | Send DF030 to old supplier and sewerage undertaker | Two days | Mandatory |

9.2.4 Role of the primary water undertaker

If the primary water undertaker is not satisfied with any revised meter reading received via a DF030, it should dispute this separately with the parties concerned.

9.3 Maintenance and update of customer details process

9.3.1 Purpose of the maintenance and update of customer details process

The primary water undertaker must keep a register of all eligible premises within its area of appointment that have been part of a supply transfer via the CTP. The information related to the CTP is shown in the data dictionary in appendix two.

This registration system is to ensure that relevant customer details are updated and maintained, to minimise problems and possible rejections in subsequent customer transfers.

The primary undertaker is only required to hold information about eligible premises once those premises have been subject to a supply transfer via the CTP.

9.3.2 Scope and objectives

This process on the maintenance and update of customer details relates to:

- customers at eligible premises which have transferred at least once;
- changes in customer data related to premises address, metering and customer information (eg special consumer); and
- changes to the sites within a customer's premises (eg where a site is added or removed).

The process employs the same general principles and transmission medium of the CTP, with the use of recognised data flows from the data dictionary.

In this process, the current supplier is referred to as the 'new supplier'.

9.3.3 Customer data changes

Changes in customer data can originate from the:

- primary water undertaker, such as meter changes (ie new meter serial number); and
- new supplier, such as changes to special consumer, address details.

To maintain the continuity and timeliness of the data in registration systems, primary water undertakers and new suppliers should ensure that their own internal processes provide distinct triggers to maintain up-to-date customer data.

The primary water undertaker must inform all relevant suppliers and sewerage undertakers of any changes it has made to its register. The new supplier must also inform the primary water undertaker of any changes to its customer's premises. This must be done within two working days of becoming aware of the changes. The primary water undertaker must then update its register with the information and make all relevant suppliers and sewerage undertakers aware of the change.

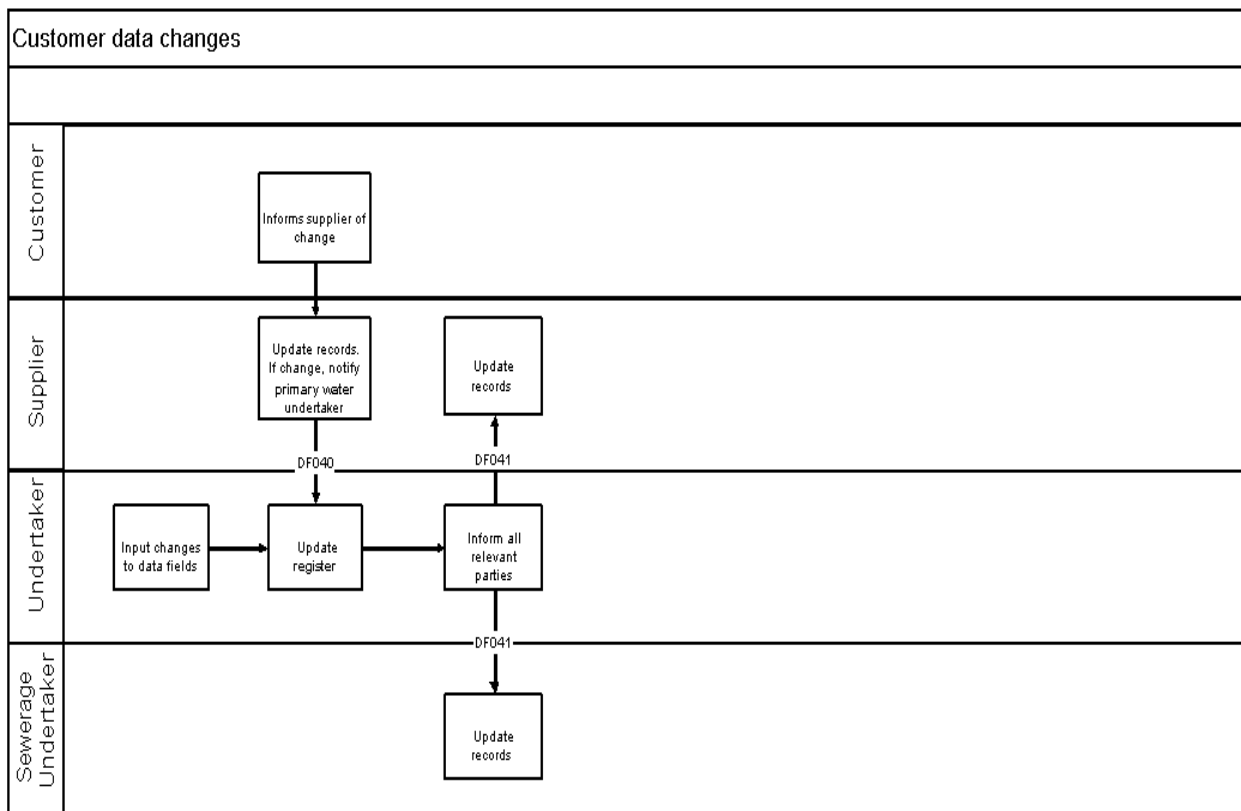
Where the new supplier recognises that a change in customer data has occurred, it should notify the primary water undertaker by sending a DF040 (notification of a change of register details).

The primary water undertaker should then update its register within two working days, confirming the change in data back to the new supplier. The primary water undertaker should then advise the sewerage undertaker by issuing a DF041 (confirmation of a change of register details).

The new supplier should also update its records within two working days.

On receiving the revised information, all other market participants should update their own records of information. This should prevent administrative delays in subsequent transfers, in ongoing meter readings and billing.

Figure 11: Customer data changes procedure



9.3.4 Customer premises changes

For the circumstances where a customer’s premises are no longer eligible to be supplied by a licensee, please refer to our guidance on eligibility and the New Customer Exception Regulations.

The licensee, rather than the water undertaker, should ensure that the premises of a customer or a potential customer are eligible to be supplied by them. It is a criminal offence for a licensee to supply premises of customers that are ineligible and any

licensee that contravenes the eligibility requirements could face enforcement action by us under section 18 WIA91 and may incur financial penalties.

Licensees will have declared that the premises of its customers are eligible to be supplied when negotiating the access agreement. Once the customer has transferred to a new supplier, the new supplier must inform the primary water undertaker if the customer's premises change and are no longer eligible.

The most common circumstances of change to a customer's premises include the following. Other circumstances can also be adapted to include these general principles.

i) Customer contract with the new supplier expires or is terminated

Where the new supplier is made aware that its contract with a customer is to expire or be terminated and not renewed, the new supplier must inform the primary water undertaker immediately. The new supplier should write to the customer, informing it that it should engage an alternative supplier or transfer to the primary water undertaker.

Where the customer has not made arrangements to transfer to an alternative supplier, the primary water undertaker should then transfer the customer back to itself using a DF001 and follow the customer transfer process. In this case, the new supplier (which becomes the old supplier) should not unnecessarily delay the transfer, although this is subject to the objection rules (chapter 7) in relation to outstanding debt.

ii) Site within a customer's premises is sold off or split, or a new site is added

Where the premises change and the new premises (there will be two or more sets of premises where the original premises are split) are still eligible for supply by a licensee, the new supplier should write to the customer(s) of the premises concerned within two working days of becoming aware of the change. This should inform the customer(s) of the various options for taking a supply. Issues of who is to supply whom in these circumstances will have to be resolved by the various parties and will depend in part on the terms of existing agreements. They should be addressed by the customer(s) at the time of the sale or split of the premises. However, for the purpose of the CTP, the presumption is that customers will remain with the new supplier unless and until they conclude a contract with an alternative supplier. The foregoing is subject to any contractual arrangements that have been entered into with the customers.

The new supplier should inform the primary water undertaker within two working days of the change. The primary water undertaker will then within two working days:

- raise a new PRN for each new eligible premises (including an enlarged premises where a new site has been added);
- advise the new supplier and sewerage undertaker via a DF042 (notification of a change of PRN); and
- update its register.

The primary water undertaker and the new supplier's contract may also provide for the conclusion of a new contract between them if there are any changes to a set of eligible premises. This should be done when the new PRN is raised. However, such new contracts should not be varied unreasonably from the original, and must comply with that set out in our access code guidance.

Where the premises change and only one resulting set of premises is still eligible for supply by a licensee, the new supplier should write to the customer who is assumed to be still eligible within two working days of becoming aware of the change. The new supplier should inform the customer of the eligibility requirement and that it is entering into a 'new undertaking'. This is subject to any contractual arrangements that have been entered into with the customer.

The new supplier should inform the primary water undertaker within two working days of the change. The primary water undertaker will then within two working days:

- raise a new PRN for the revised eligible premises;
- advise the new supplier and sewerage undertaker via a DF042 (notification of a change of PRN); and
- update its register.

The new supplier should write to the customer who is not eligible within two working days of becoming aware of the change, informing that customer that it must transfer to the primary water undertaker. The ineligible customer will take a supply from the primary water undertaker under section 63AC WIA91 (the interim supply duty), subject to any contractual arrangements that have been entered into between the primary water undertaker and the customer.

The new supplier should inform the primary water undertaker of the address(es) and meters that are no longer eligible.

The primary water undertaker (which becomes the new supplier) will then within two working days:

- transfer the ineligible premises by raising a DF001 and follow the customer transfer process. In this case, the new supplier (which becomes the old supplier) should not unnecessarily delay the transfer, although this is subject to the objection rules (chapter 7) in relation to outstanding debt;
- confirm the transfer to customer; and
- update its register.

9.3.5 Recommended timings

Table 7: The timing for customer data changes

| Who | Reason | Working days | Status |
|--------------------------|---|---------------------|---------------|
| New supplier | Inform primary water undertaker of change in register details (DF040) | Two | Mandatory |
| Primary water undertaker | Inform new supplier and sewerage undertaker of change in register details (DF041) | Two | Mandatory |

Table 8: The timing for customer premises changes

| Who | Reason | Working Days | Status |
|--------------------------|--|---------------------|---------------|
| New supplier | Expired contact – inform primary water undertaker | Same day | Mandatory |
| Primary water undertaker | Start transfer back | Same day | Mandatory |
| New supplier | Write to all customers if still eligible and inform the primary water undertaker | Two | Mandatory |
| Primary water undertaker | Issue new PRN; Issue DF042 and update register | Two | Mandatory |
| New supplier | Write to ineligible customer informing of transfer to alternative supplier or primary water undertaker | Two | Mandatory |

9.4 Determinations

Compliance with the CTP is mandatory, by reason of standard licence condition 6 and condition of appointment S. We can enforce compliance with the CTP under the enforcement provisions contained in section 18 WIA91. We believe that nearly all disputes concerning customer transfers can and will be resolved by adherence to the CTP. We recognise, however, that disputes may occur in the operation of the CTP

and for the competitive market to function effectively, such disputes need to be resolved as quickly as possible.

Standard licence condition 6(6) and condition of appointment S(6) provide that, where we so determine, the CTP shall provide for specified matters or types of matters to be referred to and determined by us. The following matters may be referred to us for determination:

- customer transfer process;
- erroneous transfers;
- disputed transfer meter readings; and
- any other matter whose determination is relevant to those matters.

9.5 Operational codes of practice

In order to ease further operational activities in the wider water industry, codes of practice between market participants will need to be developed and agreed. These codes of practice will be outside the CTP.

In addition, the codes of practice will need to clarify the roles and responsibilities of market participants. This should include the roles of sewerage undertakers (for example, if sewerage is currently collected by the primary water undertaker and is to be subject to change where a relationship exists directly between the supplier/customer and the sewerage undertaker). Operational codes of practice will include but are not limited to the following list:

- Sending multiple meter readings.
- Provision of, and responsibility for, routine meter readings to an agreed minimum frequency.
- Provision of new premises and customer details to water and sewerage undertakers.
- Change in eligible customer premises details:
 - change of meters;
 - change of premises correspondence address;
 - change of special consumer; and
 - change of occupancy or ownership of premises.
- Multiple register meters.
- Dual site registration.
- New connections.
- Disconnections.
- Dealing with incidents.
- Emergency procedures.
- Unmetered supplies.
- Faulty meters – replacement.
- Provision of management information for reporting purposes.
- Meter reading disputes (non change of supplier).
- Estimated meter readings.

- Missing data (eg, if additional meters are identified post transfer).
- Billing queries.
- Customer dissatisfaction.
- Rejection due to infringement of Water Supply (Water Fittings) Regulations.

10. Customer transfer protocol change management

We recognise the need for a structure to be in place to allow all parties to have input to the running of, and changes to the CTP as a result of changes in the market. Processes and data structures will inevitably change over time and it is essential that the management of change be controlled to allow all participants in the market the chance to review proposed changes.

Under standard licence condition 6 and condition of appointment S, water undertakers and licensees have an obligation to comply with the CTP and they will be able to manage its future development. Failure to comply with the CTP would be a breach of those obligations, which would require us, subject to certain exceptions, to take enforcement action.

In order to keep the CTP under review, there will be a formal framework to provide a process for resolving operational issues. Also, a change management process will set out details of the process for initiating change, the timing and implementation of such changes, any rights of appeal, funding and voting arrangements and our role in reviewing the CTP.

The framework will contain a degree of self-regulation to allow all stakeholders (including customers) to play an appropriate part in shaping the pace and direction of change. Change proposals should be dealt with quickly and management costs should be kept to a minimum. Any decisions taken should be transparent, with no exclusion of relevant information or views and contributions should be allowed from all interested parties.

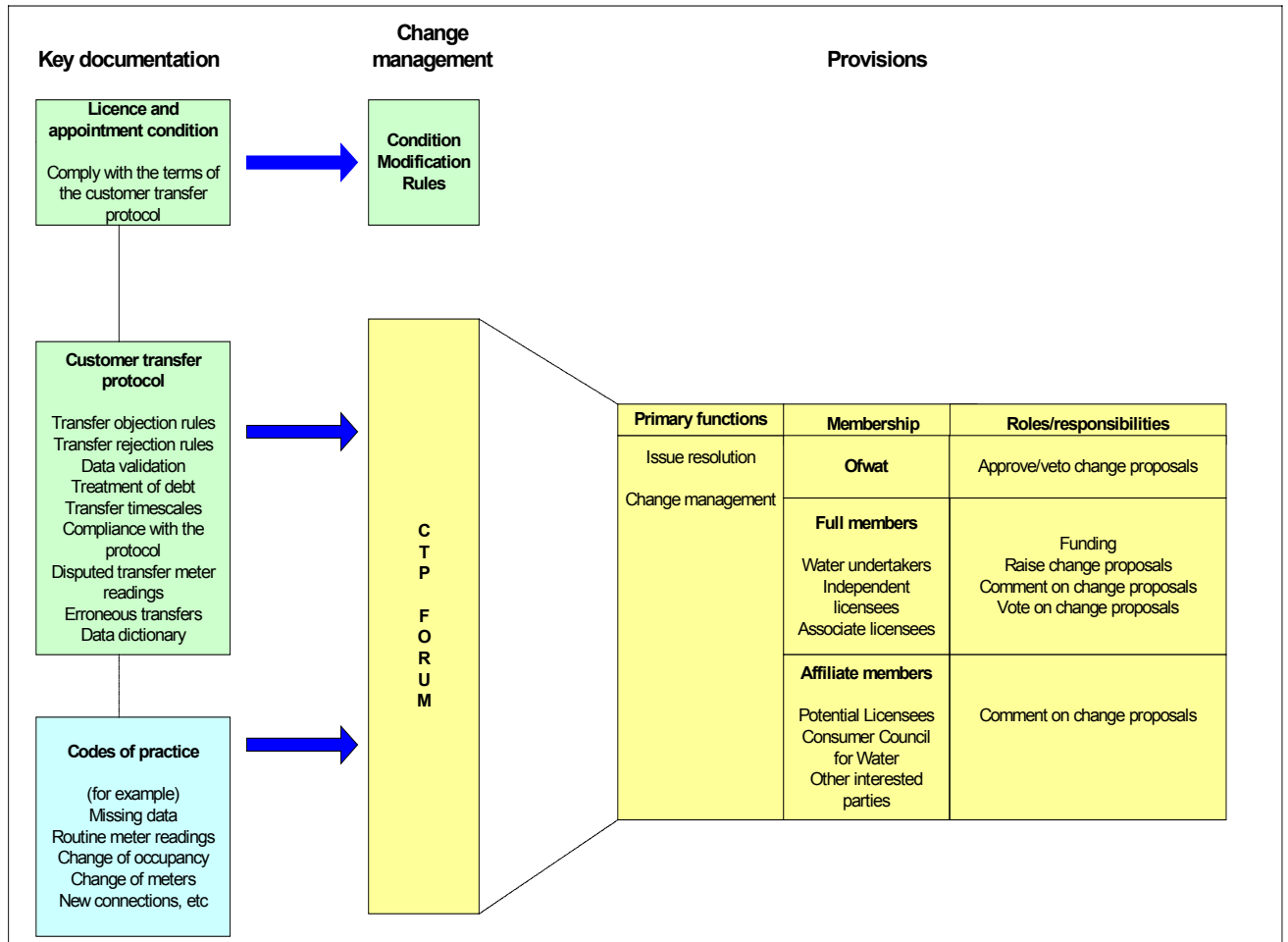
Change management and rules for change control will be operated for the benefit of all full CTP forum members without undue influence from any one of them. There should also be some overall objectives by which to judge the desirability of change.

Change management should be responsive to the needs of market participants. There should be feedback on the operation of the rules governing change and how they could be improved, and the ability to change them.

10.1 Customer transfer protocol forum

The most effective means of implementing change management is through a CTP forum. The CTP forum will be established to oversee, review and develop the CTP, including the data dictionary and other operational codes of practice. Figure 12 sets out the issues that will be considered by the CTP forum, including membership, roles and responsibilities.

Figure 12: CTP Forum



10.1.1 Purpose of the forum

In addition to providing issue resolution and change management functions, the CTP forum should provide:

- a platform for the discussion of matters relating to customer transfers;
- formal channels of communication between water undertakers, licensees and other interested parties on CTP issues;
- a means for the exchange of information, either acquired as a result of the activities outlined above or acquired by other means that is deemed to be of collective value to the members;
- a review of the processes, including data flows, with the purpose of improving all such processes;
- the commission of research and promote the organisation of meetings, seminars, publications or such other activities related to the CTP as forum members may require; and
- an appeal mechanism to Ofwat where members are unable to agree amicably on CTP related processes/issues.

In addition to us, there will be two types of member of the forum – full and affiliate. All water undertakers, on which we formally serve the CTP, and licensees will be full members by virtue of condition of appointment S and standard licence condition 6 obliging them to comply with the terms of the CTP. Any potential licensee that has commenced the licence application process before 1 December 2005 will be classed as a full member. Potential licensees that have started the licence application process after 1 December 2005 will be affiliate members. The Consumer Council for Water (CCWater) and other interested parties, such as Water UK and Department for Environment, Food and Rural Affairs (Defra), can become affiliate members by choice.

Full members will be responsible for overall ownership of the forum and its funding and will be able to raise, comment upon and vote in respect of change proposals to the CTP and operational codes of practice. Affiliate members will be entitled to attend forum meetings and comment upon any change proposals, but they will not be eligible to vote on proposed changes.

Given the mandatory nature of the CTP and as specified in standard licence condition 6 and condition of appointment S, our role is different to that of a full or affiliate member. Our role allows us to veto changes that full members have agreed on or to determine whether the change to the CTP can be made where full members are in deadlock. We will also maintain the CTP and determine CTP disputes that are referred to us.

All full and affiliate members and we should receive the minutes of forum meetings and associated papers.

10.1.2 Organisation of the forum

Once established, the CTP forum will meet every three months, subject to there being sufficient issues for discussion. Additional meetings may be requested by members as and when required.

The meeting agendas may contain any items required by any member giving five days' notice to the chairman. Exceptional and important items may be raised without notice at the meeting at the discretion of attendees.

10.1.3 Role of the secretariat

We will provide the secretariat function initially. As experience develops, the role will be competitively tendered to appoint a secretary who will then manage the forum and CTP independently from us.

The secretary will provide the following services:

- membership (capturing and maintaining contact details and voting rights of each member organisation);
- accession of new forum members;

- meeting management (provision of venues, preparation and circulation of agendas);
- production of the minutes;
- change control (production of change control document templates; drafting of change proposals, circulation of change proposals, compilation of votes including collection of proxies, and recording of outcome to agreed timescales);
- editing and maintaining key documentation (CTP including the data dictionary, operational codes of practice, forum constitution), to reflect agreed changes;
- release management (production and release of approved documentation in agreed format); and
- general administrative support.

10.1.4 Funding arrangements

Funding of the CTP forum will be in accordance with two methodologies.

At first, we will chair, organise and fund the CTP forum. Once an independent secretary is appointed, the funding arrangement will change. The forum will thereafter be funded on an equitable basis with costs apportioned equally among all full members as follows:

$$\text{Proportion of costs} = \frac{T}{N}$$

T = total costs

N = number of full members

10.1.5 Voting arrangements

We propose that voting arrangements would be limited to full members based on 3 constituencies:

1. Water undertakers.
2. Associate licensees.¹⁷
3. Independent licensees.

Each constituency would have one-third of the total vote with the share of the vote within each constituency determined by its members. For example, water undertakers could apportion votes based on their relative total asset values or turnover related to water services (as detailed in the June return); associate licensees could adopt a one member one vote basis; and independent licensees votes could weight their votes based on their market share by volume (eligible premises).

Where members of the constituency cannot determine how voting rights are to be distributed amongst them, we would make the determination.

¹⁷ Licensees that are related to water undertakers, as defined in standard licence condition 7 and condition of appointment R(5).

In order for a change proposal to be approved, a majority of 67% of the votes cast by full members need to be in favour of the resolution.

Votes cast would be calculated from attendance either in person or by proxy, with abstentions not included. Where a constituency has no members, voting would still be determined by reference to the volume of votes cast. We would either formally approve each change proposal or use a veto.

In the event of a member not agreeing with a decision of the forum, the matter would be referred to a further meeting as an appeal, with the additional option of referring the matter to us for a determination. Examples of disputes and agreements that may be presented to the forum and passed to us for determination are:

- change agreed but disputed by a forum member on the grounds it might unfairly prejudice the rights of market participants;
- change rejected but disputed by a forum member on the grounds that the failure to make the change might unfairly prejudice the rights of market participants;
- industry change that is irreconcilable, ie deadlock exists;
- misinterpretation of the information in the CTP; and
- inappropriate use of voting, which may unfairly prejudice the rights of market participants.

For a meeting of the forum to be quorate, more than 50% of the full members must have a representative present in person or by proxy. If a full member does not have a representative in attendance, it may lodge a written proxy vote with the secretary before the meeting is held.

11. Glossary of terms

There follows a brief description of some of the terms used in the WSL regime. Readers should refer to WIA91 for precise statutory meanings.

Access: The wholesale supply of water by a water undertaker to a licensee for the purpose of making a retail supply of water to the premises of the licensee's customer; and/or the introduction of water by the licensee into a water undertaker's supply system for that purpose.

Access agreement: An agreement between a water undertaker and a licensee for access by a licensee to a water undertaker's supply system pursuant to the retail authorisation and/or supplementary authorisation.

Access code: A water undertaker's document that sets out all principal aspects of access to its supply system and the terms and conditions on which it will grant access to its supply system by a licensee. The access code comprises the standard terms and conditions common to all water undertakers and the terms and conditions specific to that water undertaker.

Access terms: The terms under which a water undertaker and a licensee agree access to a water undertaker's supply system.

Combined licence: A retail licence with the supplementary authorisation, authorising the holder to introduce water into a water undertaker's supply system and to supply that water to a customer's eligible premises (section 17A(6) WIA91).

Combined supply: A supply made pursuant to a combined licence.

Conditions of appointment: Conditions imposed on water undertakers pursuant to under section 11 WIA91.

Customer transfer protocol: Clear, simple and standardised transfer process for the timely and efficient transfer of customers from one supplier to another.

Data dictionary: Catalogue of core customer data generated to support the customer transfer process.

Data fields: Individual items of data that are transferred as part of the CTP.

Data flow: A logical flow of information between market participants that is defined in terms of its constituent data fields.

Defra: Department for Environment, Food and Rural Affairs.

DWI: Drinking Water Inspectorate.

Eligible premises: Premises that satisfy the eligibility requirements in section 17A(3) WIA91.

Licensee: A company holding either a retail licence or a combined licence; also referred to as a licensed water supplier.

New supplier: The supplier that registers a customer transfer in order to acquire a water supply to that customer at eligible premises via the CTP.

Old supplier: The supplier that ceases to supply the customer at eligible premises via the CTP.

Primary water undertaker: For the purposes of section 66A WIA91 (wholesale water supply by primary water undertaker) and section 66C WIA91 (wholesale water supply by secondary water undertaker), a water undertaker is the primary water undertaker of a licensee if the undertaker's supply system is to be used for the purposes of making the supply to the premises of the licensee's customer.

Premises reference number (PRN): Unique number assigned to an eligible premises for the purpose of identifying premises that are transferring within the CTP.

Registration system: An information technology system to enable the electronic transfer of customer information within the CTP.

Retail authorisation: An authorisation to a company to use a water undertaker's supply system for the purpose of supplying water to the eligible premises of customers of the company (section 17A(2) WIA91).

Retail licence: A Water Supply Licence giving the holder the retail authorisation, entitling the holder to purchase wholesale a supply of water from the water undertaker and to supply it retail to a customer's eligible premises (section 17A(4) WIA91).

Secondary water undertaker: A water undertaker other than a licensee's primary water undertaker (section 66C(1)(a)(i) WIA91).

Sewerage undertaker: A company appointed to provide wastewater services to a defined geographic area.

Standard licence conditions: The standard terms and conditions of Water Supply Licences determined and published by the Secretary of State (for the Environment Food and Rural Affairs) pursuant to section 17H WIA91.

Supplementary authorisation: An authorisation to a company to introduce water into a water undertaker's supply system for the purpose of making a retail supply of water to a customer under section 17A(5) WIA91.

Supply system: Any water mains and other pipes used for the purposes of conveying water from a water undertaker's treatment works to its customer's premises and any water mains and other pipes used to convey non-domestic water from any source to premises that are not connected directly or indirectly to any water

mains or pipes connected to those treatment works. This term is defined in section 17B(5) WIA91.

Water Supply Licence: A licence granted to a company giving it the retail authorisation, or both the retail authorisation and the supplementary authorisation.

Water undertaker: A company appointed under section 6 WIA91 to provide water services in respect of a defined geographic area of England and Wales.

WIA91: The Water Industry Act 1991 (as amended by the Water Act 2003).

Wholesale supplies: Supply of water to a licensee by a water undertaker for the purposes of retail by the licensee to its customer's premises.

Appendix 1: Flow charts illustrating the customer transfer process with and without an objection

Figure 13: CTP process overview

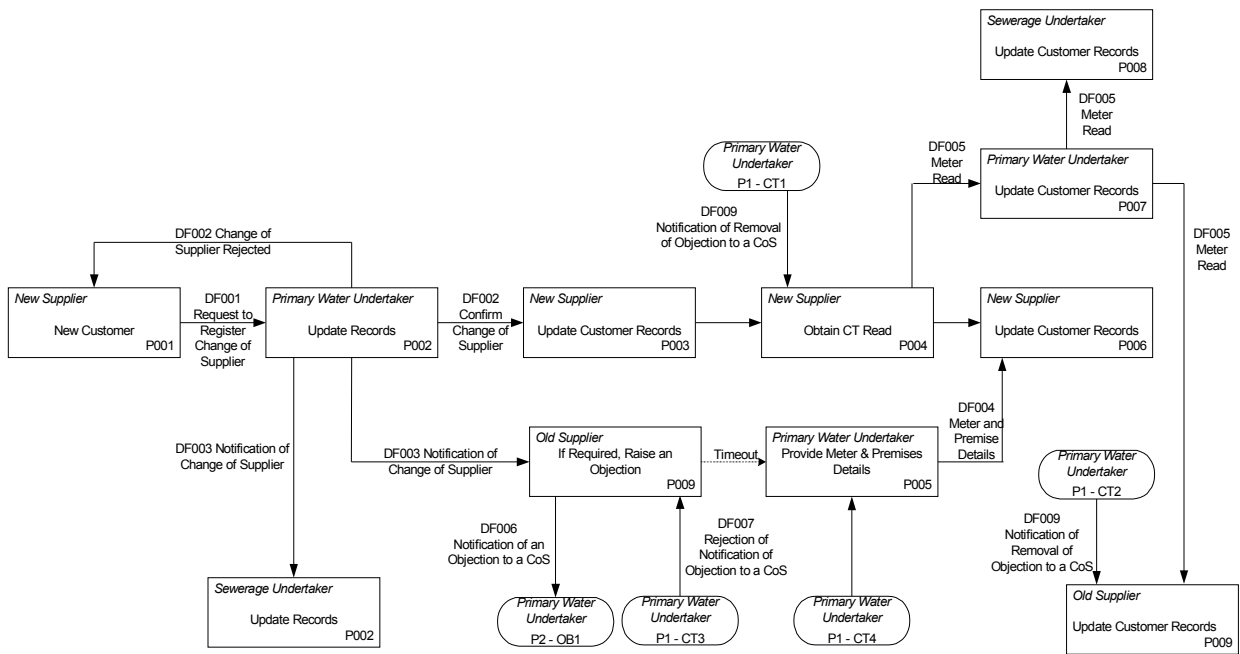
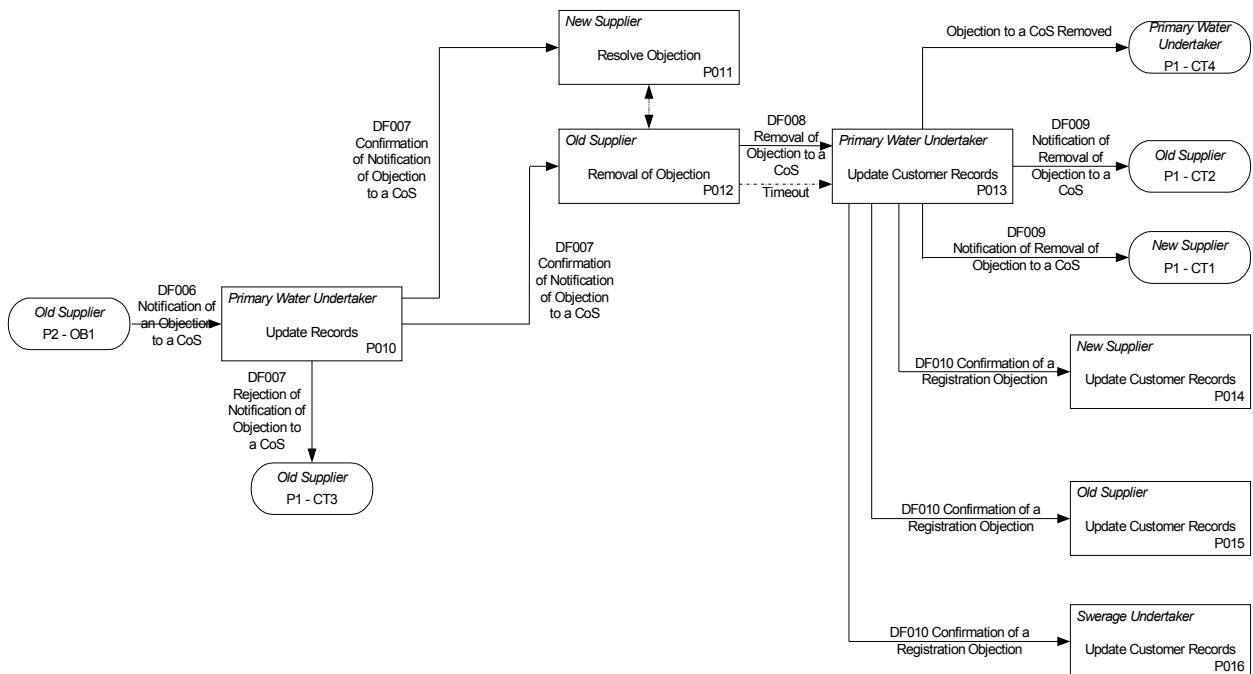


Figure 14: CTP process overview where there is an objection to customer transfer



Appendix 2: Customer transfer protocol data dictionary

Background

To support the customer transfer process, there are defined:

- data fields;
- data flow definitions; and
- market data.

The data flows are used to communicate information between market participants and the data fields are the information within each flow.

The customer transfer process has been designed to contain the minimum number of individual processes and data interchanges in order that customers can easily change supplier in a timely and effective manner.

Data fields

Data fields are the individual items of data which need to be transferred as part of the CTP. Examples include, meter readings, addresses, dates and premises reference number.

Data Item No: **WD1**

Field Name: **Record type identifier**

Format: Character

Length: 3

Allowed Values: AFH Header record
 ZFT Trailer record
 DFnnn where nnn is from 001 to 999 but limited to those flows defined in the data flow section

Comments:

Data Item No: **WD2**

Field Name: **Sending organisation ID**

Format: Character

Length: 3

Allowed Values: See organisation ID in the market data section

Comments:

Data Item No: WD3
Field Name: Receiving organisation ID
Format: Character
Length: 3
Allowed Values: See organisation ID in the market data section
Comments:

Data Item No: WD4
Field Name: Data flow
Format: Character
Length: 5
Allowed Values: DFnnn where nnn is from 001 to 999 but limited to those flows defined in the data flow section
Comments:

Data Item No: WD5
Field Name: Data flow version
Format: Numeric (nnn)
Length: 3
Allowed Values: As defined in the data flow section
Comments: The current version of the data flow

Data Item No: WD6
Field Name: File identifier
Format: Character (faaannnnnn)
Length: 10
Allowed Values: Must be unique
Comments: f is the code for the file identifier
aaa is the code for the related sending organisation
nnnnnn is the numeric file number

Data Item No: WD7
Field Name: Flow date
Format: Date (ccyymmdd)
Length: 8
Allowed Values: Valid date within this format
Comments:

Data Item No: WD8
Field Name: Flow time
Format: hhmmss
Length: 6
Allowed Values: Valid time within this format
Comments:

Data Item No: WD9
Field Name: Test flag
Format: Character
Length: 4
Allowed Values: NULL each record in the file contains live data
TEST each record in the file contains test data which should not be processed as live data

Comments:

Data Item No: WD10
Field Name: Record count
Format: Integer
Length: Maximum 5
Allowed Values: <65,536
Comments: Total number of lines of data, excluding standard header and standard trailer records

Data Item No: WD11
Field Name: File acceptance or rejection code
Format: Numeric
Length: 2
Allowed Values: 10 File received and passed for processing
11 Sending organisation ID not recognised
12 Receiving organisation ID not recognised
13 File empty or records cannot be read
14 Number of records does not match header/trailer
15 File was addressed to the wrong organisation
16 Data flow not recognised
17 Data flow Version not recognised
18 Invalid header/trailer record
19 Maximum number of records exceeded
20 File identifier error
21 Mandatory field missing
22 Test flag not valid
23 None of the above (explanation provided in the comments field)
Comments: Acceptable file acceptance and rejection codes

Data Item No: **WD12**
Field Name: **Premises reference number**
Format: Alphanumeric (aaannnnn)
Length: 8
Allowed Values: Must be unique
Comments: aaa is the code for the related primary water undertaker (see market data section)
nnnnn is a premises reference number for each premises that is issued by a primary water undertaker

Data Item No: **WD13**
Field Name: **Business type**
Format: Character
Length: 2
Allowed Values:

- A Agriculture, hunting and forestry
- B Fishing
- C Mining and quarrying
- CA Mining and quarrying of energy producing materials
- CB Mining and quarrying except energy producing materials
- D Manufacturing
- DA Manufacture of food products, beverages and tobacco
- DB Manufacture of textiles and textile products
- DC Manufacture of leather and leather products
- DD Manufacture of wood and wood products
- DE Manufacture of pulp, paper and paper products; publishing and printing
- DF Manufacture of coke, refined petroleum products and nuclear fuel
- DG Manufacture of chemicals, chemical products and man-made fibres
- DH Manufacture of rubber and plastic products
- DI Manufacture of other non-metallic mineral products
- DJ Manufacture of basic metals and fabricated metal products
- DK Manufacture of machinery and equipment not elsewhere classified
- DL Manufacture of electrical and optical equipment
- DM Manufacture of transport equipment
- DN Manufacturing not elsewhere classified
- E Electricity, gas and water suppliers
- F Construction
- G Wholesale and retail trade; repair of motor vehicles, motorcycles and personal and household goods
- H Hotels and restaurants
- I Transport, storage and communication
- J Financial intermediation
- K Real estate, renting and business activities
- L Public administration and defence; compulsory social security
- M Education

- N Health and social work
- O Other community, social and personal service activities
- P Private households with employed persons
- Q Extra-territorial organisations and bodies

Comments: The UK Standard Industrial Classification of Economic Activities (UK SIC(92)) that is used to classify business establishments and other statistical units by the type of economic activities they are engaged in.

Data Item No: **WD14**
Field Name: **New supplier ID**
Format: Character
Length: 3
Allowed Values: See organisation ID in market data section
Comments:

Data Item No: **WD15**
Field Name: **Old supplier ID**
Format: Character
Length: 3
Allowed Values: See organisation ID in market data section
Comments:

Data Item No: **WD16**
Field Name: **Meter serial number**
Format: Character
Length: Maximum 20
Allowed Values: Valid meter serial number
Comments:

Data Item No: **WD17**
Field Name: **Meter manufacturer ID**
Format: Character
Length: 2
Allowed Values: KT Kent
 SC Schlumberger
 AS AHS
 FW Flowmeter
 AB ABB
 SO Socam
 SM Smartmeter
 FU Fusion
 AO Another
Comments: Meter manufacturers

Data Item No: WD18
Field Name: Meter model
Format: Character
Length: 20
Allowed Values: Valid model of the meter
Comments:

Data Item No: WD19
Field Name: Meter type
Format: Character
Length: 2
Allowed Values: DP Differential pressure
EC Electromagnetic – Combimeter
EF Electromagnetic – Full Bore
T Turbine
U Ultrasonic
V Vane
A Another

Comments:

Data Item No: WD20
Field Name: Meter size
Format: Numeric
Length: Maximum 4
Allowed Values:
Comments: Internal diameter of meter bore, expressed in millimetres (mm) or inches

Data Item No: WD21
Field Name: Meter location
Format: Character
Length: Maximum 255
Allowed Values: Any valid characters within defined character set
Comments: Examples of meter location details:
Location types: (boundary box, boiler room, entrance hall, unknown, kitchen, meter house), (agricultural, pit, touch pad location, radio), (internal, external)
GPS location
Other kit installed with meter, eg pulse heads, and ability to visually read the dial

Data Item No: WD22
Field Name: Meter installation date
Format: Date (ccyymmdd)
Length: 8
Allowed Values: Valid date within this format
Comments:

Data Item No: WD23
Field Name: Meter multiplier
Format: Integer
Length: 3
Allowed Values: Valid within format
Comments:

Data Item No: WD24
Field Name: Meter reading
Format: Integer
Length: Maximum 8
Allowed Values:
Comments: Default value is null
Meter readings are expressed as whole numbers

Data Item No: WD25
Field Name: Meter reading date
Format: Date (ccyymmdd)
Length: 8
Allowed Values: Valid date within this format
Comments:

Data Item No: WD26
Field Name: Meter reading type
Format: Character
Length: 2
Allowed Values: CA Customer actual reading
SA New supplier actual reading
OA Old supplier actual reading
OE Old supplier estimate
SE New supplier estimate
Comments:

Data Item No: WD27
Field Name: Meter OS location
Format: Alphanumeric
Length: 8
Allowed Values: Any valid characters within defined character set
Comments: Ordnance survey co-ordinates location

Data Item No: WD28
Field Name: Transfer date
Format: Date (ccyymmdd)
Length: 8
Allowed Values: Valid date within this format
Comments:

Data Item No: WD29
Field Name: Primary water undertaker ID
Format: Character
Length: 3
Allowed Values: See organisation ID in market data section
Comments:

Data Item No: WD30
Field Name: Change of supplier acceptance or rejection code
Format: Numeric
Length: 2
Allowed Values:

| | |
|----|--|
| 10 | Change of supplier request accepted |
| 11 | Change of supplier request rejected – Invalid primary water undertaker ID |
| 12 | Change of supplier request rejected – Invalid new supplier ID |
| 13 | Change of supplier request rejected – Invalid old supplier ID |
| 14 | Change of supplier request rejected – Data mismatch on old supplier ID |
| 15 | Change of supplier request rejected – Data mismatch on number of meters |
| 16 | Change of supplier request rejected – No access arrangements in place |
| 17 | Change of supplier request rejected – Invalid customer (not a recognised premises on the water undertakers network) |
| 18 | Change of supplier request rejected – Invalid premises reference number |
| 19 | Change of supplier request rejected – Notice of registration greater than 30 or less than 20 working days before transfer date |
| 20 | Change of supplier request rejected – transfer already in progress |

Comments: Acceptable file acceptance and rejection codes for inclusion in the file header when sending a flow. When using code 18, it is intended that where a primary water undertaker is unable to reconcile the details in the request for registration, with the access agreement details for that supplier, it should reject the application. Further discussion between the parties may be required to clarify the ambiguous application.

Data Item No: WD31
Field Name: Eligible premises address line 1
Format: Character
Length: Maximum 100
Allowed Values: Any valid characters within defined character set
Comments: Customer at the eligible premises

Data Item No: WD32
Field Name: Eligible premises address line 2
Format: Character
Length: Maximum 100
Allowed Values: Any valid characters within defined character set
Comments: Sub-building name or number, eg warehouse

Data Item No: WD33
Field Name: Eligible premises address line 3
Format: Character
Length: Maximum 100
Allowed Values: Any valid characters within defined character set
Comments: Building name or number

Data Item No: WD34
Field Name: Eligible premises address line 4
Format: Character
Length: Maximum 100
Allowed Values: Any valid characters within defined character set
Comments: Dependent thoroughfare

Data Item No: WD35
Field Name: Eligible premises address line 5
Format: Character
Length: Maximum 100
Allowed Values: Any valid characters within defined character set
Comments: Thoroughfare

Data Item No: WD36
Field Name: Eligible premises address line 6
Format: Character
Length: Maximum 100
Allowed Values: Any valid characters within defined character set
Comments: Double dependent locality

Data Item No: WD37
Field Name: Eligible premises address line 7
Format: Character
Length: Maximum 100
Allowed Values: Any valid characters within defined character set
Comments: Dependent locality

Data Item No: WD38
Field Name: Eligible premises address line 8
Format: Character
Length: Maximum 100
Allowed Values: Any valid characters within defined character set
Comments: Locality (post town)

Data Item No: WD39
Field Name: Eligible premises address line 9
Format: Character
Length: Maximum 100
Allowed Values: Any valid characters within defined character set
Comments: County

Data Item No: WD40
Field Name: Eligible premises address postcode
Format: Character
Length: Maximum 8
Allowed Values: Valid postcode
Comments:

Data Item No: WD41
Field Name: Confirmation or rejection of a notification of objection code
Format: Numeric
Length: 2
Allowed Values: 10 Notification of objection accepted
11 Notification of objection rejected – Invalid new supplier ID
12 Notification of objection rejected – Objection outside objection period
Comments:

Data Item No: WD42
Field Name: Objection reason
Format: Numeric
Length: 2
Allowed Values: 10 Customer debt
11 Existing contract
12 Co-operative objection
13 Customer requested objection
Comments:

Data Item No: WD43
Field Name: Special consumer
Format: Character
Length: 1
Allowed Values: Y Yes
N No
Comments: This field is an indicator of a special consumer residing at the premises

Data Item No: WD44
Field Name: Number of meters
Format: Integer
Length: Maximum 3
Allowed Values:
Comments:

Data Item No: WD45
Field Name: Comments
Format: Character
Length: Maximum 255
Allowed Values: Any valid characters within defined character set
Comments: Free format for additional comments

Data Item No: WD46
Field Name: Sending organisation role code
Format: Character
Length: 1
Allowed Values: S Supplier
U Primary water undertaker
Comments:

Data Item No: WD47
Field Name: Receiving organisation role code
Format: Character
Length: 1
Allowed Values: S Supplier
U Primary water undertaker
W Sewerage undertaker
Comments:

Data Item No: WD48
Field Name: Method of meter reading
Format: Character
Length: 1
Allowed Values: V Visual
R Radio
T Touch Pad
Z Remote
Comments:

Data Item No: WD49
Field Name: Meter size units
Format: Character
Length: 1
Allowed Values: M Metric
I Imperial

Comments:

Data Item No: WD50
Field Name: Erroneous transfer category
Format: Character
Length: 2
Allowed Values: PF Proven forgery or mis-selling
MI Misleading information/suspected improper marketing practice
IC Incorrect customer details
CC Cancelled contract not actioned

Comments:

Data item No: WD 51
Field Name: Erroneous transfer date
Format: Date (ccyymmdd)
Length: 8
Allowed Values: Valid date within this format
Comments: The date refers to the date the original transfer date

Data item No: WD 52
Field Name: Erroneous transfer category
Format: Character
Length: 1
Allowed Values: E Notification of erroneous transfer accepted
I Notification of erroneous transfer rejected as invalid

Comments:

Data item No: WD 53
Field Name: Erroneous transfer category
Format: Character
Length: 1
Allowed Values: B Notification of erroneous transfer accepted
I Notification of erroneous transfer rejected as invalid

Comments:

Data item No: WD 54
Field Name: Date of first raising formal transfer meter reading dispute
Format: Date (ccyymmdd)
Length: 8
Allowed Values: Valid date within this format
Comments:

Data item No: WD 55
Field Name: Escalation of a transfer meter reading dispute issue number
Format: Numeric
Length: 2
Allowed Values: 10 First issue of escalation of a transfer meter reading dispute
11 Second issue escalation of a transfer meter reading dispute
12 Notification of referral to Ofwat

Comments:

Data item No: WD 56
Field Name: Proposed alternative meter reading
Format: Integer
Length: Maximum 8
Allowed Values:
Comments: Default value is null
Meter reads expressed as whole numbers

Data item No: WD 57
Field Name: Former premises reference number
Format: Alphanumeric (aaannnnn)
Length: 8
Allowed Values: Must be unique
Comments: aaa is the code for the related primary water undertaker (see market data section)
nnnnn is a premises reference number for each premises that is issued by a primary water undertaker

Data flows

A data flow is a flow of information between market participants and is defined in terms of its constituent data fields.

The first ten data flows below define the customer transfer process and associated objection process. Data flows DF020 to DF023 are sent in the erroneous transfer process; DF030 to DF032 are sent in the disputed transfer meter reading process and DF040 to DF042 are associated with the maintenance of customer transfer data. The number of data flows in these processes may increase where required with experience of transfers.

Flow Name: DF001
Flow Version: 100
Flow Description: Request to register a change of supplier

| From | To |
|--------------|--------------------------|
| New supplier | Primary water undertaker |

| Data Item No. | Field Name | Validation |
|---------------|------------------------------------|-------------------------|
| WD14 | New supplier ID | Mandatory |
| WD15 | Old supplier ID | Conditional (if known) |
| WD12 | Premises reference number | Mandatory |
| WD44 | Number of meters | Conditional (if known) |
| WD29 | Primary water undertaker ID | Mandatory |
| WD31 | Eligible premises address line 1 | Conditional (if known) |
| WD32 | Eligible premises address line 2 | Conditional (if exists) |
| WD33 | Eligible premises address line 3 | Conditional (if exists) |
| WD34 | Eligible premises address line 4 | Conditional (if exists) |
| WD35 | Eligible premises address line 5 | Conditional (if exists) |
| WD36 | Eligible premises address line 6 | Conditional (if exists) |
| WD37 | Eligible premises address line 7 | Conditional (if exists) |
| WD38 | Eligible premises address line 8 | Conditional (if exists) |
| WD39 | Eligible premises address line 9 | Conditional (if exists) |
| WD40 | Eligible premises address postcode | Conditional (if exists) |

| | | |
|------|---------------|-----------|
| WD28 | Transfer date | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF002
Flow Version: 100
Flow Description: Confirmation or rejection of a change of supplier

| | |
|--------------------------|--------------|
| From | To |
| Primary water undertaker | New supplier |

| Data Item No. | Field Name | Validation |
|---------------|---|-------------------------|
| WD12 | Premises reference number | Mandatory |
| WD15 | Old supplier ID | Mandatory |
| WD44 | Number of meters | Mandatory |
| WD30 | Change of supplier acceptance or rejection code | Mandatory |
| WD31 | Eligible premises address line 1 | Conditional (if known) |
| WD32 | Eligible premises address line 2 | Conditional (if exists) |
| WD33 | Eligible premises address line 3 | Conditional (if exists) |
| WD34 | Eligible premises address line 4 | Conditional (if exists) |
| WD35 | Eligible premises address line 5 | Conditional (if exists) |
| WD36 | Eligible premises address line 6 | Conditional (if exists) |
| WD37 | Eligible premises address line 7 | Conditional (if exists) |
| WD38 | Eligible premises address line 8 | Conditional (if exists) |
| WD39 | Eligible premises address line 9 | Conditional (if exists) |
| WD40 | Eligible premises address postcode | Conditional (if exists) |
| WD45 | Comments | Optional |

Notes:

Use of the rejection code may be applied to applications for a registration, that are no more than 30 working days before the transfer date and no less than 20 working days before the transfer date.

Flow Name: DF003
Flow Version: 100
Flow Description: Notification of a change of supplier

| From | To |
|--------------------------|---------------------|
| Primary water undertaker | New supplier |
| Primary water undertaker | Old supplier |
| Primary water undertaker | Sewerage undertaker |

| Data Item No. | Field Name | Validation |
|---------------|------------------------------------|-------------------------|
| WD12 | Premises reference number | Mandatory |
| WD14 | New supplier ID | Mandatory |
| WD31 | Eligible premises address line 1 | Conditional (if known) |
| WD32 | Eligible premises address line 2 | Conditional (if exists) |
| WD33 | Eligible premises address line 3 | Conditional (if exists) |
| WD34 | Eligible premises address line 4 | Conditional (if exists) |
| WD35 | Eligible premises address line 5 | Conditional (if exists) |
| WD36 | Eligible premises address line 6 | Conditional (if exists) |
| WD37 | Eligible premises address line 7 | Conditional (if exists) |
| WD38 | Eligible premises address line 8 | Conditional (if exists) |
| WD39 | Eligible premises address line 9 | Conditional (if exists) |
| WD40 | Eligible premises address postcode | Conditional (if exists) |
| WD16 | Meter serial number | Mandatory |
| WD28 | Transfer date | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF004
Flow Version: 100
Flow Description: Notification of metering and premises details

| From | To |
|--------------------------|--------------|
| Primary water undertaker | New supplier |
| Primary water undertaker | Old supplier |

| Data Item No. | Field Name | Validation |
|---------------|------------------------------------|---|
| WD12 | Premises reference number | Mandatory |
| WD13 | Business type | Mandatory |
| WD43 | Special consumer | Conditional (if exists) |
| WD31 | Eligible premises address line 1 | Conditional (where different to premises) |
| WD32 | Eligible premises address line 2 | Conditional (where different to premises) |
| WD33 | Eligible premises address line 3 | Conditional (where different to premises) |
| WD34 | Eligible premises address line 4 | Conditional (where different to premises) |
| WD35 | Eligible premises address line 5 | Conditional (where different to premises) |
| WD36 | Eligible premises address line 6 | Conditional (where different to premises) |
| WD37 | Eligible premises address line 7 | Conditional (where different to premises) |
| WD38 | Eligible premises address line 8 | Conditional (where different to premises) |
| WD39 | Eligible premises address line 9 | Conditional (where different to premises) |
| WD40 | Eligible premises address postcode | Conditional (where different to premises) |
| WD16 | Meter serial number | Mandatory |
| WD17 | Meter manufacturer ID | Mandatory |
| WD18 | Meter model | Conditional (if exists) |
| WD19 | Meter type | Conditional (if known) |
| WD20 | Meter size | Mandatory |
| WD49 | Meter size units | Mandatory |
| WD21 | Meter location | Mandatory |
| WD27 | Meter OS location | Conditional (if known) |
| WD48 | Method of reading | Mandatory |
| WD22 | Meter installation date | Mandatory |
| WD23 | Meter multiplier | Conditional (if exists) |
| WD45 | Comments | Optional |

Notes:

Where more than one address is used to identify the eligible premises, the location of a meter can be expressed as an address where used, to aid location and linking to special requirements at the premises.

Where meter location is available as a map reference, this should be provided.

Flow Name: DF005
Flow Version: 100
Flow Description: Meter reading

| From | To |
|--------------------------|--------------------------|
| New supplier | Primary water undertaker |
| Primary water undertaker | Old supplier |
| Primary water undertaker | Sewerage undertaker |

| Data Item No. | Field Name | Validation |
|---------------|---------------------------|------------|
| WD12 | Premises reference number | Mandatory |
| WD16 | Meter serial number | Mandatory |
| WD24 | Meter reading | Mandatory |
| WD25 | Meter reading date | Mandatory |
| WD26 | Meter reading type | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF006
Flow Version: 100
Flow Description: Notification of an objection to a change of supplier

| From | To |
|--------------|--------------------------|
| Old supplier | Primary water undertaker |

| Data Item No. | Field Name | Validation |
|---------------|---------------------------|------------|
| WD12 | Premises reference number | Mandatory |
| WD14 | New supplier ID | Mandatory |
| WD42 | Objection reason | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF007
Flow Version: 100
Flow Description: Confirmation or rejection of a notification of an objection to a change of supplier

| From | To |
|--------------------------|--------------|
| Primary water undertaker | New supplier |
| Primary water undertaker | Old supplier |

| Data Item No. | Field Name | Validation |
|---------------|--|------------|
| WD12 | Premises reference number | Mandatory |
| WD41 | Confirmation or rejection of a notification of an objection code | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF008
Flow Version: 100
Flow Description: Removal of an objection to a change of supplier

| From | To |
|--------------|--------------------------|
| Old supplier | Primary water undertaker |

| Data Item No. | Field Name | Validation |
|---------------|---------------------------|------------|
| WD12 | Premises reference number | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF009
Flow Version: 100
Flow Description: Notification of a removal of an objection to a change of supplier

| From | To |
|--------------------------|--------------|
| Primary water undertaker | Old supplier |
| Primary water undertaker | New supplier |

| Data Item No. | Field Name | Validation |
|---------------|---------------------------|------------|
| WD12 | Premises reference number | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF010
Flow Version: 100
Flow Description: Confirmation of a registration objection

| From | To |
|--------------------------|---------------------|
| Primary water undertaker | Old supplier |
| Primary water undertaker | New supplier |
| Primary water undertaker | Sewerage undertaker |

| Data Item No. | Field Name | Validation |
|---------------|---------------------------|------------|
| WD12 | Premises reference number | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF020
Flow Version: 100
Flow Description: Notification of an erroneous transfer

| From | To |
|--------------|--------------|
| New supplier | Old supplier |

| Data Item No. | Field Name | Validation |
|---------------|------------------------------------|-------------------------|
| WD12 | Premises reference number | Mandatory |
| WD14 | New supplier ID | Mandatory |
| WD44 | Number of meters | Mandatory |
| WD29 | Primary water undertaker ID | Mandatory |
| WD50 | Erroneous transfer category | Mandatory |
| WD31 | Eligible premises address line 1 | Conditional (if known) |
| WD32 | Eligible premises address line 2 | Conditional (if exists) |
| WD33 | Eligible premises address line 3 | Conditional (if exists) |
| WD34 | Eligible premises address line 4 | Conditional (if exists) |
| WD35 | Eligible premises address line 5 | Conditional (if exists) |
| WD36 | Eligible premises address line 6 | Conditional (if exists) |
| WD37 | Eligible premises address line 7 | Conditional (if exists) |
| WD38 | Eligible premises address line 8 | Conditional (if exists) |
| WD39 | Eligible premises address line 9 | Conditional (if exists) |
| WD40 | Eligible premises address postcode | Conditional (if exists) |
| WD51 | Erroneous transfer date | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF021
Flow Version: 100
Flow Description: Acceptance or rejection of a notification of an erroneous transfer

| From | To |
|--------------|--------------|
| Old supplier | New supplier |

| Data Item No. | Field Name | Validation |
|---------------|--|------------|
| WD12 | Premises reference number | Mandatory |
| WD15 | Old supplier ID | Mandatory |
| WD44 | Number of meters | Mandatory |
| WD51 | Erroneous transfer date | Mandatory |
| WD52 | Acceptance or rejection of a notification of an erroneous transfer | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF022
Flow Version: 100
Flow Description: Notification of an erroneous transfer

| From | To |
|--------------|--------------|
| Old supplier | New supplier |

| Data Item No. | Field Name | Validation |
|---------------|------------------------------------|-------------------------|
| WD12 | Premises reference number | Mandatory |
| WD15 | Old supplier ID | Mandatory |
| WD44 | Number of meters | Mandatory |
| WD29 | Primary water undertaker ID | Mandatory |
| WD50 | Erroneous transfer category | Mandatory |
| WD31 | Eligible premises address line 1 | Conditional (if known) |
| WD32 | Eligible premises address line 2 | Conditional (if exists) |
| WD33 | Eligible premises address line 3 | Conditional (if exists) |
| WD34 | Eligible premises address line 4 | Conditional (if exists) |
| WD35 | Eligible premises address line 5 | Conditional (if exists) |
| WD36 | Eligible premises address line 6 | Conditional (if exists) |
| WD37 | Eligible premises address line 7 | Conditional (if exists) |
| WD38 | Eligible premises address line 8 | Conditional (if exists) |
| WD39 | Eligible premises address line 9 | Conditional (if exists) |
| WD40 | Eligible premises address postcode | Conditional (if exists) |
| WD51 | Erroneous transfer date | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF023
Flow Version: 100
Flow Description: Acceptance or rejection of a notification of an erroneous transfer

| From | To |
|--------------|--------------|
| New supplier | Old supplier |

| Data Item No. | Field Name | Validation |
|---------------|--|------------|
| WD12 | Premises reference number | Mandatory |
| WD15 | Old supplier ID | Mandatory |
| WD44 | Number of meters | Mandatory |
| WD51 | Erroneous transfer date | Mandatory |
| WD53 | Acceptance or rejection of a notification of an erroneous transfer | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF030
Flow Version: 100
Flow Description: Notification of an agreed revised meter reading

| From | To |
|--------------------------|--------------------------|
| New supplier | Primary water undertaker |
| Primary water undertaker | Old supplier |
| Primary water undertaker | Sewerage undertaker |

| Data Item No. | Field Name | Validation |
|---------------|---------------------------|------------|
| WD12 | Premises reference number | Mandatory |
| WD16 | Meter serial number | Mandatory |
| WD24 | Meter reading | Mandatory |
| WD25 | Meter reading date | Mandatory |
| WD26 | Meter reading type | Mandatory |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF031
Flow Version: 100
Flow Description: Formal notification of a disputed transfer meter reading

| From | To |
|--------------|--------------|
| Old supplier | New supplier |

| Data Item No. | Field Name | Validation |
|---------------|------------------------------------|------------|
| WD12 | Premises reference number | Mandatory |
| WD16 | Meter serial number | Mandatory |
| WD24 | Meter reading | Mandatory |
| WD25 | Meter reading date | Mandatory |
| WD26 | Meter reading type | Mandatory |
| WD56 | Proposed alternative meter reading | Mandatory |
| WD45 | Comments | Mandatory |

Notes:

It is expected that the old supplier will populate the flow with the meter reading causing the dispute and the proposed alternative meter reading, including details to inform of the reason in the comments field.

Flow Name: DF032
Flow Version: 100
Flow Description: Escalation of a disputed transfer meter reading

| | |
|--------------|--------------|
| From | To |
| Old supplier | New supplier |

| Data Item No. | Field Name | Validation |
|----------------------|---|-------------------|
| WD12 | Premises reference number | Mandatory |
| WD55 | Escalation of a transfer meter reading dispute issue number | Mandatory |
| WD54 | Date of first raising formal transfer meter reading dispute | Mandatory |
| WD16 | Meter serial number | Mandatory |
| WD24 | Meter reading | Mandatory |
| WD25 | Meter reading date | Mandatory |
| WD26 | Meter reading type | Mandatory |
| WD56 | Proposed alternative meter reading | Mandatory |
| WD45 | Comments | Mandatory |

Notes:

It is expected that the old supplier will populate the flow with the meter reading causing the dispute and the proposed alternative meter reading, including details to inform of the reason in the comments field.

Flow Name: DF040
Flow Version: 100
Flow Description: Notification of a change of register details

| From | To |
|--------------|--------------------------|
| New supplier | Primary water undertaker |

| Data Item No. | Field Name | Validation |
|---------------|------------------------------------|------------------------|
| WD12 | Premises reference number | Mandatory |
| WD13 | Business type | Mandatory |
| WD43 | Special consumer | Mandatory (if changed) |
| WD31 | Eligible premises address line 1 | Mandatory (if changed) |
| WD32 | Eligible premises address line 2 | Mandatory (if changed) |
| WD33 | Eligible premises address line 3 | Mandatory (if changed) |
| WD34 | Eligible premises address line 4 | Mandatory (if changed) |
| WD35 | Eligible premises address line 5 | Mandatory (if changed) |
| WD36 | Eligible premises address line 6 | Mandatory (if changed) |
| WD37 | Eligible premises address line 7 | Mandatory (if changed) |
| WD38 | Eligible premises address line 8 | Mandatory (if changed) |
| WD39 | Eligible premises address line 9 | Mandatory (if changed) |
| WD40 | Eligible premises address postcode | Mandatory (if changed) |
| WD44 | Number of meters | Mandatory (if changed) |
| WD16 | Meter serial number | Mandatory (if changed) |
| WD17 | Meter manufacturer ID | Mandatory (if changed) |
| WD18 | Meter model | Mandatory (if changed) |
| WD19 | Meter type | Mandatory (if changed) |
| WD20 | Meter size | Mandatory (if changed) |
| WD49 | Meter size units | Mandatory (if changed) |
| WD21 | Meter location | Mandatory (if changed) |
| WD27 | Meter OS location | Mandatory (if changed) |
| WD48 | Method of reading | Mandatory (if changed) |
| WD22 | Meter installation date | Mandatory (if changed) |
| WD23 | Meter multiplier | Mandatory (if changed) |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF041

Flow Version: 100

Flow Description: Confirmation of a change of register details

| From | To |
|--------------------------|---------------------|
| Primary water undertaker | New supplier |
| Primary water undertaker | Sewerage undertaker |

| Data Item No. | Field Name | Validation |
|----------------------|---------------------------|------------------------|
| WD12 | Premises reference number | Mandatory |
| WD13 | Business type | Mandatory (if changed) |
| WD16 | Meter serial number | Mandatory (if changed) |
| WD17 | Meter manufacturer ID | Mandatory (if changed) |
| WD18 | Meter model | Mandatory (if changed) |
| WD19 | Meter type | Mandatory (if changed) |
| WD20 | Meter size | Mandatory (if changed) |
| WD21 | Meter location | Mandatory (if changed) |
| WD27 | Meter OS location | Mandatory (if changed) |
| WD22 | Meter installation date | Mandatory (if changed) |
| WD23 | Meter multiplier | Mandatory (if changed) |
| WD45 | Comments | Optional |

Notes:

Flow Name: DF042
Flow Version: 100
Flow Description: Notification of a change of premises reference number

| From | To |
|--------------------------|---------------------|
| Primary water undertaker | New supplier |
| Primary water undertaker | Sewerage undertaker |

| Data Item No. | Field Name | Validation |
|---------------|------------------------------------|------------------------|
| WD12 | Premises reference number | Mandatory |
| WD57 | Former premises reference number | Mandatory |
| WD13 | Business type | Mandatory (if changed) |
| WD29 | Primary water undertaker ID | Mandatory |
| WD43 | Special consumer | Mandatory (if changed) |
| WD31 | Eligible premises address line 1 | Mandatory (if changed) |
| WD32 | Eligible premises address line 2 | Mandatory (if changed) |
| WD33 | Eligible premises address line 3 | Mandatory (if changed) |
| WD34 | Eligible premises address line 4 | Mandatory (if changed) |
| WD35 | Eligible premises address line 5 | Mandatory (if changed) |
| WD36 | Eligible premises address line 6 | Mandatory (if changed) |
| WD37 | Eligible premises address line 7 | Mandatory (if changed) |
| WD38 | Eligible premises address line 8 | Mandatory (if changed) |
| WD39 | Eligible premises address line 9 | Mandatory (if changed) |
| WD40 | Eligible premises address postcode | Mandatory (if changed) |
| WD44 | Number of meters | Mandatory (if changed) |
| WD16 | Meter serial number | Mandatory (if changed) |
| WD17 | Meter manufacturer ID | Mandatory (if changed) |
| WD18 | Meter model | Mandatory (if changed) |
| WD19 | Meter type | Mandatory (if changed) |
| WD20 | Meter size | Mandatory (if changed) |
| WD49 | Meter size units | Mandatory (if changed) |
| WD21 | Meter location | Mandatory (if changed) |
| WD27 | Meter OS location | Mandatory (if changed) |

| | | |
|------|-------------------------|------------------------|
| WD48 | Method of reading | Mandatory (if changed) |
| WD22 | Meter installation date | Mandatory (if changed) |
| WD23 | Meter multiplier | Mandatory (if changed) |
| WD45 | Comments | Optional |

Notes:

Market data

Market data is the set of data on organisation identification of market participants required to ensure operability.

MSD item: **Organisation ID**
Format: Character
Length: 3

| Values: | Organisation ID | Organisation |
|----------------|------------------------|------------------------------|
| | ALB | Albion |
| | ANH | Anglian |
| | BRL | Bristol |
| | BWH | Bournemouth & West Hampshire |
| | CAM | Cambridge |
| | CHL | Cholderton |
| | DVW | Dee Valley |
| | FLK | Folkestone & Dover |
| | MKT | Mid Kent |
| | MSE | South East |
| | NES | Northumbrian |
| | NWT | United Utilities |
| | PRT | Portsmouth |
| | SES | Sutton & East Surrey |
| | SRN | Southern |
| | SST | South Staffordshire |
| | SVT | Severn Trent |
| | SWT | South West |
| | THD | Tendring Hundred |
| | TMS | Thames |
| | WSH | Dŵr Cymru (Welsh) |
| | WSX | Wessex |
| | YKY | Yorkshire |
| | TVN | Three Valleys |

Annex A: File header definition

| Data Item No. | Field Name | Validation |
|----------------------|-----------------------------------|-----------------------------------|
| WD1 | Record type identifier | Mandatory |
| WD2 | Sending organisation ID | Mandatory |
| WD46 | Sending organisation role code | Mandatory |
| WD3 | Receiving organisation ID | Mandatory |
| WD47 | Receiving organisation role code | Mandatory |
| WD4 | Data flow | Mandatory |
| WD5 | Data flow version | Mandatory |
| WD6 | File identifier | Mandatory |
| WD7 | Flow date | Mandatory |
| WD8 | Flow time | Mandatory |
| WD9 | Test flag | Conditional (exists if test flow) |
| WD10 | Record count | Mandatory |
| WD11 | File acceptance or rejection code | Conditional |

Annex B: File trailer definition

| Data Item No. | Field Name | Validation |
|----------------------|------------------------|-------------------|
| WD1 | Record type identifier | Mandatory |
| WD6 | File identifier | Mandatory |
| WD10 | Record count | Mandatory |