

Northumbrian Water welcomes the publication of the consultation on the Wholesale Retail Code (WRC) and the opportunity to comment on the proposals.

Consultation Questions

We would be grateful for comments on the issues raised in Sections 3.1 to 3.3 and the associated drafting together in particular whether the WRC is in a form ready to be issued by Ofwat and whether the draft Designation Document is acceptable. In addition we would welcome any suggested improvements to the WRC for the purposes of Market Opening.

The WRC comprises many individual documents and to aid our consideration of your comments or suggested drafting it would be helpful if you could ensure that you make a full reference to the document where you are making a comment or suggesting a change

In addition, you should explain the rationale for the comment or suggested change together with your view on whether the change is needed prior to Market Opening and why. You should also explain why this change has not been raised earlier to the ICP or indeed whether this change has already been considered by the ICP.

We have reviewed the proposed changes and are supportive of the suggested changes and consider the WRC in its proposed form to be acceptable subject to our specific comments detailed below;

- We note the positions on derogations to the WRC and welcome the availability of such a process.
- We welcome the additional clarity on the precedence of the relevant documents in order to remove any ambiguity.
- We are supportive of the proposed approach to arrange a mass signing event for the MAC Framework Agreement but believe that the signing of any Wholesale Retail Contract should be a matter for the relevant parties to agree. We would support Market Participants being encouraged to facilitate contract signing on the same day as the MAC signing event, as this provides obvious logistical benefits, but this should be entirely optional and to be mutually agreed by the relevant parties.

- We have been specifically requested to comment on whether the WRC is in a form ready to be issued. The WRC as proposed includes a number of approved changes that are not yet implemented in the Central Market Operating System (CMOS). Accordingly we can only confirm our support with the proviso that the changes included are implemented in CMOS prior to market opening. Should any required functionality be unavailable then the WRC will need amending or a method of deferring the requirement to comply with any affected section of the WRC is put in place until such time as the central system has the required functionality.

Northumbrian Water (Wholesale)
Dec 2016