
Wholesale Retail Code Change Proposal – CPW017

Modification proposal	Wholesale Retail Code Change Proposal CPW016 – CSD 0105 (Error Rectification and Retrospective Amendments) Clarifications and Updates
Decision	Ofwat has decided to accept this change proposal
Publication date	1 September 2017
Implementation date	2 October 2017

Background

The Wholesale Retail Code (WRC) sets out the relationship between Wholesalers and Retailers, and how the market will operate. The WRC includes a number of Code Subsidiary Documents (CSD), which are the detailed processes and responsibilities that further describe and facilitate the performance of duties under the Market Terms, as set out in Schedule 1 Part 5 of the WRC. This proposal seeks to amend CSD 0105 in order to align the document with the central system (CMOS) design, resolve some inconsistencies and provide additional clarity on how certain corrective transactions (TCORRs) should be used.

The issue

CSD 0105 Error Rectification and Retrospective Amendments sets out the controlled processes and procedures for the correction of Data Items held in the Central Systems.

The current content of CSD 0105 contains several inconsistencies, which have emerged because of misalignment with the design of the Central Market Operator Systems (CMOS) or due to lack of clarity on how TCORRs should be used.

The modification proposal¹

¹ The proposal and accompanying documentation is available on the MOSL website at <https://www.mosl.co.uk/market-codes/change#scroll-track-a-change>

Market Operator Services Ltd (MOSL), as the Market Operator and proposer of this change, seeks to enhance CSD 0105 to align it with CMOS design, resolve some inconsistencies and provide additional clarity on the use of certain TCORRs. MOSL contends that some of the current specifications in CSD 0105 are incomplete and not in alignment with the design of CMOS, or not clear enough to provide sufficient information to Trading Parties. Without carrying out the amendments proposed in this Change Proposal, there is a potential for ambiguity and confusion to be created amongst Trading Parties.

Specifically, this Change Proposal seeks to make the following changes:

1. Amend Section 5.1.9(b) of CSD 0105 to fully cover the range of Water Chargeable Meter Sizes between 20mm and 30mm.
2. Amend CSD 0105 section 6.2.6 (b) to align it with section 2.5.3 so that both sections refer to the same timescales for Self-Certified Retrospective Amendment “i.e. meter read date is either within the current month or the previous 8 preceding months.”
3. Clarify the date on which TCORR177.W can be used to amend the Supply Point Effective From Date (commencement date). Introducing this clarity in the transaction will assist Trading Parties to use this transaction correctly.
4. A typo has been identified in the current section 6.3.5 (b)
5. Amend section 6.3.7 to clarify how TCORR115.W needs to be submitted to erase a Supply Point and that it can be used to notify a temporary disconnection, a permanent disconnection or a reconnection of a supply point to the market operator. There will be no change in functionality to TCORR115.W by making these amendments to CSD 0105.

It is recommended that these modifications come into effect on 2 October 2017.

Industry consultation and assessment

In total, seven Trading Parties responded to the industry consultation, all of whom were Wholesalers. Key points arising from the consultation are set out below.

- All parties agreed with the proposed changes and agreed that the proposed changes improve the quality of CSD 0105, stating that the changes provide clarification on Data Transaction submission and reduce the risk of confusion.

- Four Wholesalers stated that they would not be impacted by proposed changes in CPW017 and two stated that although there would be no system impact, but there would be a need to update user guides and understanding.
- All Trading Parties agreed that the proposed changes better facilitated the Objectives and Principles of the WRC, citing that they remove ambiguity in the codes, add consistency to the CSDs and make it easier to interpret requirements.
- All Trading Parties agreed with the proposed implementation date of October 2017.

Panel recommendation

At its meeting on 25 July 2017, the Panel recommended, by unanimous decision, that Ofwat approve this change for implementation on 3 March 2018. The Panel submitted its recommendation report to Ofwat on 28 July 2017, which set out the Panel's view that this change improves the Principles of transparency and simplicity, cost effectiveness and security.

Our decision

We have carefully considered the issues raised by the modification proposal and the supporting documentation provided in the Panel's recommendation report. We have concluded that the implementation of CPW017 will better facilitate the principles and objectives of the WRC, detailed in Schedule 1 Part 1 Objectives, Principles and Definitions and is consistent with our statutory duties.

Reasons for our decision

We set out below our views on which of the applicable Code Principles are better facilitated by the modification proposal.

Transparency

We consider that this proposal improves the overall quality of CSD 0105 and enhances certain provisions in the code document by making them more clearly expressed and aligning them to the design of the Central Systems. In addition, by clearly explaining how certain TCORR transactions work, these provisions are made visible and readily accessible to Trading Parties.

Simplicity, cost effectiveness and security

We think that this proposal improves the description of certain TCORR transactions as detailed in CSD 0105 and corrects some requirements in the code document,

thus ensuring that they are as clear and complete as possible and reflect the processes established under the Market Terms.

Decision notice

In accordance with paragraph 7.2.8 of the Market Arrangements Code, Ofwat approves this change proposal.

Priya Sinha
Director, Market Outcomes