
Wholesale Retail Code Change Proposal – CPW014

Modification proposal	Wholesale Retail Code Change Proposal CPW014 – CSD 0301 (Data Catalogue) Updates
Decision	Ofwat has decided to accept this change proposal
Publication date	1 September 2017
Implementation date	3 March 2018

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 0301 in order to align the market codes with the design of the Central Market Operating System (CMOS), and to resolve further inconsistencies in the Data Catalogue and CMOS.

The issue

CSD 0301: Data Catalogue provides definitions for Data Items and Data Transactions used for Trading Party interaction with CMOS. These definitions ensure a managed data exchange between Trading Parties and the Market Operator.

The current content of CSD 0301 contains several inconsistencies, either between different sections of the Data Catalogue itself, or inconsistencies with the design of CMOS. As such, some Data Items and Data Transactions have specifications which are either incomplete or are different to the ones which have been built into the CMOS. Similarly, three Data Transactions have specifications, both in CSD 0301 and CMOS, which are not aligned with the overall design principles of the market.

The modification proposal¹

Market Operator Services Ltd (MOSL), as the Market Operator and proposer of this change, seeks to provide further clarity on certain Data Items and Data Transactions described in CSD 0301, with the overall intent of aligning the Data Catalogue to the design of CMOS and therefore improving the overall quality of CSD 0301 and design of CMOS. MOSL contends that some of the current specifications in CSD 0301 are either incomplete and not in alignment with other provisions described in the Data Catalogue, nor do they fully reflect the design of CMOS. Without carrying out the amendments proposed in this Change Proposal, there is a potential for confusion to be created amongst the users of CMOS.

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

- 1.** Clarify that the Retailer cannot update the meter location details for non-market meters, which should appropriately be solely the responsibility of Wholesalers.
- 2.** Clarify that when updating the meter manufacturer and/or manufacturer meter serial number, both old meter identification and new meter identification must be updated.
- 3.** Amend the name of transaction T132.R in section 4.4 to reflect the correct name of the transaction.
- 4.** Introduce an additional cancellation code (approved by Ofwat on 30th September 2015 WRC007 “30 Sept 2015 MAP: Cross Border Matters”), which can be used for cases where either the Outgoing Retailer or the Incoming Retailer want to cancel a transfer registration application.
- 5.** Reintroduce the ‘NOSPID’ Pairing Reference Reason Code which was mistakenly removed in Version 1.0 of the market codes.

It is recommended that these modifications come into effect on 3 March 2018.

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>

Industry consultation and assessment

In total, eight Trading Parties responded to the industry consultation, ran by MOSL, of which seven were Wholesalers and one was a Retailer.

Key points arising from the consultation are set out below. The Panel, at its meeting on 25 July 2017, recognised that the concerns raised by Business Stream have been addressed through changing the implementation approach and the implementation date of CPW014 to 3rd March 2018.

- All wholesalers agreed with the proposed changes and that they deliver clarity and improve the overall quality of CSD 0301;
- The retailer disagreed with the proposed changes, maintaining that there would also need to be XSD (a validation mechanism built into CMOS) changes for this change to be effective. Note, as set out above, this issue has been addressed in the revised approach which is discussed further below.
- Three Wholesalers stated that they would not be impacted by the proposed changes. Two other Wholesalers stated that they would be impacted in a minor manner, while one Wholesaler asserted that there might be the need for XSD changes in their H2Flow system if deemed necessary.
- The Retailer also stated that they would be impacted by the proposed changes; the level of which is dependent on the changes to the CMOS XSDs.
- All Wholesalers agreed that the proposed changes better facilitate the Objectives and Principles of the WRC, with the Retailer stating that the XSDs for certain data items would have to change in order for CPW014 to be an effective Change Proposal.

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, instead of the originally proposed implementation date of October 2017. The Panel reviewed the consultation responses received and considered its recommendation to the Authority. The Panel agreed that in order to effectively implement CPW014, changes would have to be made to both CSD 0301 and CMOS. The Panel therefore supported the revised implementation approach (which includes issuing new XSDs to reflect changes made in CPW014).

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 CPW014 will better facilitate the principles and objectives of the WRC², 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 0301, and as a consequence of this, improves the compatibility with, and design of, the Central Systems. It also enhances certain provisions in the code document by making them more clearly expressed and aligning them to the design of the Central Systems

Simplicity, cost effectiveness and security

We think that this proposal improves the description of certain Data Items and Data Transactions in CSD 0301 ensuring that they are as clear 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

² Available at <https://www.mosl.co.uk/market-codes/codes>