
Wholesale Retail Code Change Proposal – CPW016

Modification proposal	Wholesale Retail Code Change Proposal CPW016 – CSD 0104 (Meter Networks) Clarification
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 0104 in order to introduce further clarity on the configuration of meter networks.

The issue

CSD 0104 Maintain SPID Data documents the processes by which Data Owners update SPID Data in the Central Systems in reaction to key events or changes in circumstances at an Eligible Premises. The SPID Data held in the Central Systems should accurately reflect the circumstances at each Supply Point.

The current content of CSD 0104 could be improved to align the document to changes made in CSD 0301 as part of WRC032 "CSD0301 Updates – Meter Networks (Future)" and provide additional clarity in respect of requirements which deal with Non-Market Meters and Cross-Border Meters. In addition, the current wording of section 18 of CSD 0104, which deals with the configuration of meter networks, is not clear enough, and introduces unnecessary complications with the way some of the statements are written.

The modification proposal¹

Market Operator Services Ltd (MOSL), as the Market Operator and proposer of this change, seeks to align CSD 0104 with CSD 0301, provide additional clarity in relation to Non-Market Meters and Cross Border Meters, and rewrite section 18 to provide more clarity to Trading Parties in respect of Meter Networks. This change does not affect the functionality described or place additional obligations on Trading Parties or the Market Operator. MOSL contends that some of the current specifications in CSD 0104 are incomplete, not in alignment with other provisions described in CSD 0301, or not as clear as they could be. Without carrying out the amendments proposed in this Change Proposal, there is potential for confusion to be created amongst Trading Parties.

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

1. Clarify which data items need to be submitted by the Wholesaler on the T104.W, and which data items are set by CMOS. This concerns non-market meters and cross boarder meters.
2. Update Section 17 of CSD 0104, which describes the behaviour of T114.W (Update Meter Chargeable), to ensure that it is consistent with the changes made to CSD 0301.
3. Rewrite section 18 of CSD 104 (which describes the processes to follow when adding/removing Meter Networks) to ensure language is clear and that it aligns with CSD 0301.

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 0104, stating that the changes provide clarification on Data Items and Data Transaction submission.

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>

- Three Wholesalers stated that they would not be impacted by CPW016, with two Wholesalers stating that although there would be no system impact, there would be minor impacts of communicating the update to their Wholesale Services division and updates to user guides. One Wholesaler stated that CPW016 would require changes to their interfaces and technical changes as outlined in Change Proposal WRC032.
- All Trading Parties agreed that the proposed changes better facilitated the Objectives and Principles of the WRC, citing that they provide clarity of the information requested when submitting transactions. In addition, Trading Parties added that not implementing this Change Proposal may result in new entrants being misled.
- 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 CPW016 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 0104 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, missed requirements in relation to Non-Market Meters and Cross Border Meters will be added, thus making them visible and readily accessible to Trading Parties.

Similarly, by amending the description of Meter Networks, requirements will be more concise and clearly explained.

Simplicity, cost effectiveness and security

We think that this proposal improves the description of Meter Networks as detailed in CSD 0104 and adds missed requirements in relation to Non-Market Meters and Cross Border Meters, thus ensuring that the requirements in CSD 0104 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