

---

## Wholesale-Retail Code Change Proposal – Ref CPW033

<b>Modification proposal</b>	Wholesale Retail Code Change Proposal CPW033 – Meter effective to date field in MDS_METER report
<b>Decision</b>	Ofwat has decided to approve this code modification
<b>Publication date</b>	28 March 2018
<b>Implementation date</b>	28 September 2018

### Background

Trading Parties have obligations under the market codes to maintain accurate and complete data items for which they are data owners. To fulfil this obligation, Trading Parties need the appropriate tools to effectively identify data inaccuracies and effectively prioritise data correction activity.

A number of standing reports are issued to Trading Parties to aid them in the understanding of market data, one of which is the MDS\_METER report. Wholesalers are using the data in the MDS\_METER report to identify data inaccuracies and fulfil their market obligation to maintain accurate and complete data records for data. The detailed specification of the MDS\_METER report, including column headers and data items reported, is set out in CSD 0302 – Standing Reports and Data Extracts.

It is argued that the lack of a means for trading parties to be able to identify which meters are active and inactive on the MDS\_METER report is hindering their ability to meet this obligation. This Change Proposal therefore seeks to add a meter “effective to” date field to the MDS\_METER Report. This field would allow users to quickly identify which meters in the report are active and which meters in the report are inactive, in order to allow users to more appropriately prioritise their data cleansing activities and remove the need for inefficient manual workarounds that some Trading Parties have in place to identify active and inactive meters within this report.

### The issue

The MDS\_METER report currently contains all active meters and meters that have been removed or exchanged in the last two years, in accordance with CSD 0104 – Maintain SPID Data. United Utilities (The Proposer) contends that it is not possible to

identify active meters without the use of cumbersome workarounds. In addition, the current report structure is hindering Trading Parties ability to:

- 1) Maintain accurate data records e.g. ensuring each meter specified has an appropriate tariff;
- 2) Ensure that Trading Party systems remain in alignment with the market data set; and
- 3) Investigate data anomalies specified in the User Exception Settlement Report

## **The modification proposal<sup>1</sup>**

The proposal seeks to add an “effective to” date field to the MDS\_METER report. This data field would correspond to a “meter effective to” date field available to CMOS Low Volume Interface (LVI) users and allow Trading Parties to quickly filter between active and inactive meters.

## **Industry consultation and assessment**

This Change Proposal was discussed at the User Forum in February 2018, and in parallel a Request for Information (RFI) was issued by MOSL to provide Trading Parties the opportunity to provide views on the proposed solution and to provide additional feedback to enhance the proposal.

The RFI was issued on 5 February 2018 with a response deadline of 19 February 2018. The questions and responses have been summarised in Appendix 1 of this document.

## **Panel recommendation**

At its meeting on 27 February 2018, the Panel unanimously recommended this Change Proposal for approval to the Authority for implementation, on the basis of improving the principles of Efficiency, Transparency, Simplicity, Cost Effectiveness and Security and Proportionality.

---

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

## **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 CPW033 will better facilitate the principles and objectives of the Wholesale Retail Code (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.

### **Efficiency**

Implementing this Change Proposal will remove the need for manual work arounds and prevents inaccurate reporting. We also note that whilst this change does not directly impact end customers, the improvements in data cleansing activity as a result of implementing this change could have the impact of customers receiving more accurate and appropriate bills.

### **Transparency**

The Change Proposal allows Trading Parties to more easily and clearly identify the status of a meter, when previously it has not been possible.

### **Proportionality**

We note the views raised in the RFI responses, in particular that Trading Parties unanimously agreed that the benefits of implementing this Change Proposal outweighs the costs on their organisations. We therefore agree with the Panel that this change is proportionate to the issue it is seeking to address.

## **Decision notice**

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

**Emma Kelso**  
**Senior Director, Customers and Casework**

## **Appendix 1 Summary of responses to Request for Information**

**Question 1: Do you agree with the proposed solution in CPW033? Please explain your answer.**

Out of 18 Trading Parties, all agreed with the proposed solution. Trading Parties agreed with the introduction of this field highlighting that the change would improve the Market Dataset's usability, as it would allow inactive SPIDs to be filtered out of the dataset. Trading Parties consistently agreed that this change would be beneficial to them.

One Trading Party also indicated that they agreed with the principle of CPW033 but suggested that the opportunity be taken to look into any further changes that could be made to the MDS reporting through an Industry Consultation.

**Question 2: Do you agree with the proposed red lined changes in CPW033?**

Out of 18 Trading Parties, all agreed with the proposed legal drafting associated with this change. However, one Trading Party suggested that the code clarifies whether an "effective to date" is an inclusive or exclusive date i.e. whether the meter is inactive on the "effective to date" or after it.

**Question 3: Please outline the extent to which existing systems and business processes developed by your organisation may need to be amended following the implementation of CPW033.**

Trading Parties in general identified that there would be minimal or no amendments required following this change. Others indicated that there would be system development requirements and amendments to make to their systems. However, Trading Parties that identified required changes clarified that they would not be significant in most cases.

**Question 4: Please outline any implementation costs to your organisation following implementation of CPW033.**

Trading Parties were in agreement that, although this change would incur costs to their organisations, the costs would be minimal. The range of costs provided to implement this change ranged from £0 to £2,500.

Some Trading Parties also highlighted that the costs of the change would be balanced by the savings made from the change.

**Question 5: Please outline any ongoing operational costs to your organisation following implementation of CPW033.**

Trading Parties were in agreement that there would be no ongoing operational costs following this change, or that any ongoing costs following this change would be minimal.

**Question 6: Do you believe that the benefits of this change outweigh the implementation and operational costs to your organisation?**

Out of 18 Trading Parties, all were in agreement that the benefits of this change would outweigh the costs of implementation, given that the costs of implementation should be minimal if any and that potential benefits could be substantial.

**Question 7: Do you agree that the proposed change better facilitates the Objectives and Principles of the WRC? Please explain your answer.**

Out of 18 Trading Parties, 17 agreed and one disagreed that this change would improve the principles of transparency and efficiency, as it will help data issues be identified and resolved. Some Trading Parties also proposed that it would improve simplicity and cost effectiveness, given the minimal impacts of the change.

One Trading Party who disagreed with this question clarified that there were still merits to the change, despite the fact they did not feel it was facilitating the principles and objectives of the WRC.

**Question 8: Do you agree with the proposed implementation date of September 2018? Please explain your answer.**

Out of 18 Trading Parties, 17 agreed and one disagreed with the implementation date, although some did also suggest that it needed to be implemented sooner.

The one Trading Party who disagreed with the proposed date suggested that the change should be implemented sooner.