

CPW067 Bulk Submission of Requests - RFI Response Summary NWL

Q1. Do you agree with the proposed solution in CPW067? Please explain your answer (specifically referencing the speed of task completion and customer experience).

Wholesalers	
Northumbrian Water Limited	<p>We partly agree with the proposed solution. Whilst we agree with the principles and intent of the change we are concerned over a number of practical aspects of the change proposed. Currently Retailers are required to process forms in a timely manner as they arise. This has the potential to worsen the speed of task completion and the customer journey if Retailers simply build up requests in order to submit in bulk on a spreadsheet at a later date. There is no doubt that the ability to use bulk submissions should be encouraged and accommodated but some guidelines should be applied around the rate and frequency of submission. It should not be allowed to simply build up a week or 2 weeks of forms and then submit them all in bulk. We would suggest that any bulk submission, unless mutually agreed with the wholesaler, should not be allowed to be more than 1.5 the average weekly submission rate. This will protect customers against delays in form submissions. Where a Retailer wishes to use a bulk submission to address a back log, or a one off issue that has been identified, then this should be allowable but a processing rate should be agreed with the Wholesaler in advance. This would allow the efficient processing of the forms but it would also enable a Wholesaler to appropriately manage the task in respect of both Customer Experience and OPS Performance.</p>

Q2. Do you agree with the proposed red line changes in CPW067? Please explain your answer.

Wholesalers	
Northumbrian Water Limited	No , the changes need to be adjusted to provide greater clarity on the circumstances of use and what are acceptable rates of bulk submission.

Q3. Are there specific scenarios or forms where the bulk transfer solution presented in CPW067 would be useful (e.g. sudden deregistration of many SPIDs)?

Wholesalers	
Northumbrian Water Limited	Yes - there are many scenarios when it would be useful. Specifically; Single Customer multiple SPID scenarios Back-log submissions of outstanding forms Bulk submissions as a result of "campaign" investigations or actions

Q4. Do you already send or receive bulk requests from other Trading Parties? Please explain your answer.

Wholesalers	
Northumbrian Water Limited	On a case by case basis we have pragmatically dealt with several requests on this basis. They have tended to be data correction/adjustment type tasks rather than any day to day processing of forms.

Q5. Outline the extent to which your organisation's existing systems and business processes developed may need to be amended following the implementation of CPW067.

Wholesalers	
Northumbrian Water Limited	We would insist that all spreadsheets would be submitted via our portal in order to eliminate the risk of transferring personal information via email. We would envisage that minimal system changes would be required to the Portal. Adjustments to our back end systems would be required, we tend to work on the basis of one Form - one Business Process so the ability to generate multiple business processes from a single form would need to be developed in order for us as a wholesaler to benefit from this change.

Q6. Outline the extent of any implementation costs to your organisation following implementation of CPW067.

Wholesalers	
Northumbrian Water Limited	At this stage we haven't done the detailed analysis of this in order to quantify the cost.

Q7. Outline the extent of any ongoing operational costs to your organisation following the implementation of CPW067.

Wholesalers	
Northumbrian Water Limited	Theoretically there should be no additional costs as the volume of forms/requests should overall remain the same. Our concern would be if Retailers are sitting on any existing back logs and the impact this would have on operational costs and performance in the short term.

Q8. Do you agree that the proposed benefits of CPW067 (e.g. improvements to the customer journey, greater efficiency for retailers) outweigh the costs of the change to your organisation? Please explain your answer.

Wholesalers	
Northumbrian Water Limited	At this stage we are not clear that the benefits outweigh the costs. We are fully supportive of this change but only subject to agreeing some practical rules around the use of this method for addressing back log work, or one off campaigns. It will be more efficient to allow Retailers to do this but the potential adverse consequences for Wholesalers need to be addressed.

Q9. Do you agree that the proposed change better facilitates the Objectives and Principles of the WRC? Please explain your answer (specifically relating to those Objectives and Principles set out in the Change Proposal).

Wholesalers	
Northumbrian Water Limited	Overall this change has the potential to deliver efficiency improvements for both Retailers, Wholesalers and Customers. However, if inappropriately used it has the potential to produce worse outcomes for customers.

Q10. Do you agree with the proposed implementation date of 8 November 2019 ? Please explain your answer.

Wholesalers	
Northumbrian Water Limited	Yes, so long as the required drafting changes required to ensure that the circumstances of use are clear.