
Wholesale Retail Code and Market Arrangements Code Change Proposals – Ref CPW114 and CPM037

Modification proposal	Wholesale Retail Code and Market Arrangements Code Change Proposals – CPW114 and CPM037– Housekeeping changes to Market Terms, CSD's and MAC
Decision	The Authority has decided to approve this Change Proposal
Publication date	16 March 2021
Implementation date	14 May 2021

Background

The Market Operator (MOSL) maintains a log of errors within the Wholesale Retail Code (WRC) and Market Arrangements Code (MAC). The purpose of this log is to capture any errors or inconsistencies discovered during the implementation of Change Proposals and use. This log is reviewed on a regular basis and Change Proposals raised as appropriate to address such errors.

The issue

During a recent review of code documentations, a number of typographical errors were identified. The affected documents are as follows:

- CSD 0002 Market Performance Framework
- CSD 0501 Change Management
- WRC Schedule 1 Part 4 Market Terms
- Market Arrangements Code (MAC)

The Change Proposal¹

Change Proposals CPW0114 and CPM037 have been raised as housekeeping changes to address typographical and referencing errors identified in the WRC and MAC. The Panel's Final Report summarises the changes as follows:

1. Changes within CSD 0002 Market Performance Framework:

- a. Correcting a spelling mistake in Section 1.4.6.
- b. Correcting the reference "Section 5.4" to "Section 5.3" in Section 4.2.11, Section 4.2.12 and Section 4.2.15.
- c. Clarification of the Key Performance Indicator Operational Performance Standard (OPS) C5a in Table 2 to bring it in line with the Operational Terms phraseology, and to remove the punctuation marks in OPS G4a.
- d. Correction of a reference in Section 4.4.1 to refer to 4.4 instead of 4.3.

2. Changes within CSD 0501 Change Management:

- a. Correcting the definition of "MAC" in Section 1.1.6.
- b. Title updated and date removed on front cover.

3. Changes within Schedule 1 Part 4 Market Terms: Updating a cross-reference in Section 4.3.9(n) following changes included in CPW103 (Interim Supply Process Amendments).

4. Changes within the MAC:

- a. Amending three instances of the word "Chairman" so that the MAC now uses the gender-neutral term "Chair" in Section 5.9.2 as per CPM030.
- b. Fixing the typographical error in the word "redistributed" in Section 9.4.2.
- c. Correcting the reference in Section 10.5.1(b) from "Section 10.4.2 (b)-(e) inclusive" to "Section 10.4.2 (b)-(f) inclusive" to accommodate for additional code sections added by CPM012.
- d. Deleting a duplication of the word "but" in Schedule 13 D Section 1.3 c.

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

An industry consultation for CPW114 and CPM037 was not undertaken. The Panel Final's Report states that it was deemed not necessary on the basis that CPW114 and CPM037 are straightforward housekeeping changes.

View from the Customer Representative

The Customer Representative (CCW) stated that they support the proposal to rectify the typographical errors that have been outlined in the Change Proposal document. Rationale provided was that it is vital that code documents are completely transparent, and easy to understand. Further, ensuring this remains the case reduces the risk of misinterpretation, and errors occurring. CCW also stated that it was important that any identified inaccuracies are rectified as soon as possible.

Panel recommendation

The Panel considered CPW114 and CPM037 at its meeting on 26 January 2021, where members agreed unanimously to recommend the Change Proposals to Ofwat for approval (13 votes in favour). The recommended date of implementation is 14 May 2021, which the Panel noted was driven by scheduled code release dates.

The Panel noted that the suggested implementation dates were driven by the scheduled code releases. The Panel also included a typographical correction and clarification of the timescale for Step 6h in the notes to OPS C5a of CSD 0002.

Our decision and reasons for decision

We have considered the issues raised by the Change Proposals and the supporting documentation provided in the Panel's Final Report and have decided to approve the proposal. We have concluded that the implementation of CPW114 and CPM037 will better facilitate the principles and objectives of the WRC and MAC and is consistent with our statutory duties. The implementation date will be 14 May 2021.

We consider that implementation of the proposed amendments will further the principle of **transparency** as the removal of errors and ensuring consistency through implementation of amendments aids interpretation and effective market

operation. In addition, we agree with the Panel’s assessment that the principle of **simplicity, cost-effectiveness and security** is furthered. The changes are simple and the Panel’s Final Report indicates that there are no costs involved in implementing the amendments. Finally, we also agree that the principle of **non-discrimination** is met by replacing any gendered terminology associated with ‘Chairman’ with gender-neutral terms such as Chair.

Decision notice

In accordance with paragraphs 6.3.7 and 7.2.9 of the Market Arrangements Code, the Authority accepts this Change Proposal.

Georgina Mills
Director, Business Retail Market