

August 2021

**CPW070a / CPM043a – Phase 2 –
Bilateral Transaction Programme
Approval: Bilateral Hub Submission
Guidance**

Approval: Bilateral Hub Submission Guidance

As part of Ofwat's decision on [CPW070a/CPM043a – Phase 2 – Bilateral Transaction Programme](#), and as an interim solution and to mitigate the risk of customer detriment where bulk submission may occur in the Bilateral Hub, we required the development of the Bilateral Hub Submission Guidance¹. The Bilateral Hub Submission Guidance (which can be viewed in appendix 1 of this document) has been developed by the Market Operator, MOSL, in consultation with Trading Parties.

Development of the Bilateral Hub Submission Guidance was a necessary customer protection measure due to the nature of the Bilateral Hub, which provides enhanced functionality for Trading Parties to bulk submit Requests. Ofwat's most recent decision on '[CPW067 – bulk submission via Microsoft excel](#)' considered the potential consequences related to bulk submissions. We expressed concerns relating to potential detrimental impacts for customers if bulk submissions are not appropriately governed.

The Bilateral Hub Submission Guidance provides interim governance for the submission of Requests, in particular, Requests which do not form part of 'business as usual' activities – i.e. those which are part of a bespoke one-off data cleansing exercise. This guidance does not restrict submission of 'business as usual' Requests, including in circumstances where there may be a higher than usual volume of 'business as usual' of Requests. To support this, the guidance prevents stockpiling of Requests – they must be submitted as soon as reasonably practicable following receipt and, in any event, in accordance with the timescales provided by the Wholesale Retail Code.

Trading Parties may agree to stagger Bulk Submissions and or utilise Deferrals to alleviate the risk of Operational Performance Standard failure. We expect Deferrals to be used in exceptional circumstances, and Trading Parties should note that MOSL may monitor the use of Deferrals relating to bulk submissions.

¹ Unless otherwise specified, the terms used in this document are those defined in the Wholesale Retail Code approved by CPW070a/CPM043a.

Amendments

We have made the following amendments to the Bilateral Hub Submission Guidance that was submitted to us:

1. Amendment to the definition of 'BAU' so that it only excludes 'bespoke one-off data cleansing activities' (including cleansing exercises which relate to 'multi-site SPIDs' and 'multiple SPIDs subject to related or similar data issues'). This amendment has been made to avoid potential negative outcomes for customers where they do not initiate a Request but the requirement for a Request to be raised for issues affecting 'multi-site SPIDs' or 'multiple SPIDs subject to related or similar issues' is instead identified by a Trading Party (through the usual course of business, rather than as part of a data cleansing exercise). These Requests should be progressed in line with the relevant SLAs as set out in the Operational Terms to avoid potential delays for customers in rectifying identified issues.
2. Amendment to the governance arrangements in the document to ensure that any changes to the Bilateral Hub Submission Guidance are approved by the Authority. This amendment has been made due to the codified nature of this guidance document and to ensure the Authority has oversight to assess the potential customer impacts prior to changes being made to the guidance.

Approval Notice

The Authority approves the Bilateral Hub Submission Guidance (as amended) which will be implemented on 22 September 2021.

The Bilateral Hub Submission Guidance provides a temporary solution which delivers a level of mitigation against potential delays for customers which might result from bulk submissions if they are not appropriately governed. It is intended that this guidance shall only apply until implementation of the enduring solution and provides a proportionate solution to only being applicable, in the first instance, to one operational process. We expect the enduring solution to sufficiently address the issues which were identified within our decision on CPW067.

This guidance document has been approved as an interim measure with the enduring solution to be developed during the next phase of the programme. Trading Parties should note that they are obliged to comply with this guidance document.

Georgina Mills
Director, Business Retail Market

Bilateral Hub Submission Guidance

MOSL

Change History

Version Number	Date of Issue	Reason for Change	Change control reference	Sections affected	Target Review Date
CPW070a/CPM043a v0.1	-	Initial draft version	CPW070a/CPM043a	All	-
CPW070a/CPM043a v0.2 (internal)	-	Revised solution	CPW070a/CPM043a	All	-
CPW070a/CPM043a v0.3	-	Revised solution	CPW070a/CPM043a	All	-

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Definitions

Unless expressly stated otherwise, for the purposes of this guidance document:

- (a) terms defined in the Wholesale-Retail Code Part 1 (Objectives, Principles and Definitions) shall apply; and
- (b) capitalised terms relating to the titles of Data Items or Data Transactions described in CSD 0301 (Data Catalogue) and/or CSD 0601 (Bilateral Data Catalogue) shall have the meaning attributed therein.

Term	Definition
BAU	Standard day to day business as usual Requests, including Customer initiated Requests and Requests resulting from cyclic metering activity, but excluding Requests which are not customer initiated and relate to (a) multi-site SPIDs; (b) multiple SPIDs subject to related or similar issues; and (c) bespoke one-off data cleansing activity which would result in a higher-than-normal volume of Requests.
Bulk Submission	The simultaneous submission of multiple Requests within the Bilateral Hub where the reasons permitted by section 2.2 of the Bilateral Hub Submission Guidance apply.

1. Introduction

1.1. Purpose and Scope

This Bilateral Hub Submission Guidance sets out:

- the circumstances in which Trading Parties shall be permitted to submit Requests in bulk via the Bilateral Hub;
- the circumstances in which an informal SLA may be agreed between Trading Parties, and the Market Operator's role; and
- how the submission of Requests via the Bilateral Hub shall be identified;

For the purpose of this guidance, an informal SLA is an agreement between Trading Parties that sets out expected timelines and/or Request volumes. Informal SLAs will not impact the application and reporting of OPS.

All Trading Parties are required to comply with Bilateral Hub Submission Guidance and any breach of this guidance should be reported to the Market Operator. The Market Operator may subsequently refer such cases to the Authority.

1.2. Governance arrangements

The solution set out within this Bilateral Hub Submission Guidance is considered to be an interim solution. The Market Operator, in conjunction with Trading Parties, shall review the terms and operation of the Bilateral Hub Submission Guidance on a regular basis with the intent to incorporate enduring provisions into the Wholesale Retail Code. Any proposed amendments to this guidance document must be presented to the Authority for final decision and prior to implementation.

The Market Operator will monitor the operational performance of this guidance and may monitor the performance of the Trading Parties against this guidance.

2. Submitting Requests via the Bilateral Hub

2.1. Key Principles

- All Requests must be submitted as soon as reasonably practicable and in any event in accordance with any timeframes stipulated in the Operational Terms or applicable CSD/OSD.
- Requests that are initiated by or have a direct impact on Non-Household Customers must not be stockpiled by a Trading Party. Stockpiling in this context refers to failing to action BAU activities as soon as reasonably practicable, resulting in the sending of Requests as unauthorised Bulk Submissions.
- Trading Parties cannot impose restrictions on the volume of Requests submitted, except where Trading Parties are agreeing a Bulk Submission for non-BAU Requests.
- The Bulk Submission process must not be used for BAU activity.

2.2. Bulk Submission

The submission of Requests through Bulk Submission is only permitted where the Retailer and Wholesaler both agree that Bulk Submission relates to ~~non-BAU activity~~ (for example, bespoke one-off data cleansings ~~exercises~~ including data cleansing exercises which relate to multi-site SPIDs and multiple SPIDs subject to the same or similar data issues) and will yield genuine overall efficiency gains.

Bulk Submissions shall be agreed on a case-by-case basis and Wholesalers must consider fairness, equity and level playing field when agreeing limits with different Retailers. The agreement of Trading Parties to a Bulk Submission must not have a detrimental impact upon the ability of Trading Parties to deal with BAU Requests and adhere to relevant SLAs/KPIs.

Trading Parties that have agreed to a Bulk Submission will remain accountable to the standard SLAs/KPIs prescribed within the relevant OSDs and CSD 0002 (Market Performance Framework) regardless of any informal SLA that has been agreed outside of the Bilateral Hub. Therefore, Trading Parties may agree to stagger Bulk Submissions and or utilise Deferrals to alleviate the risk of SLA/KPI failure. Where Trading Parties agree to use a Deferral as part of a Bulk Submission, the T213.W (Start Service Request Deferral) shall include the Request Deferral Code (D8229) RETAILER and the statement BULK in the Additional Information (D8213).

Trading Parties are required to monitor progress against informal SLAs and use best endeavours to meet agreed timelines.

The agreement of a Bulk Submission shall take place outside of the Bilateral Hub. Contracting Trading Parties shall contact each other directly where either Trading Party seeks to initiate negotiations. Where contact has been made, Trading Parties have ten (10) Business Days to negotiate and either agree a Bulk Submission (through completion of Appendix 1) or agree that the relevant Requests shall be submitted as BAU. Instances of unresolved agreements or non-engagement shall be referred to the Market Operator, who will then consider next steps.

Trading Parties shall use the template provided in Appendix 1 to record an agreed Bulk Submission. The agreement shall include as a minimum:

- Agreed start date;
- Agreed completion date;
- Number of Requests to be completed (split by process if applicable);
- Reason for the Bulk Submission; and
- Method to update on progress (for example, weekly informal reporting).

2.3. Identification of Requests within the Bilateral Hub

BAU Requests do not require additional labelling when submitted through the Bilateral Hub. However, where Trading Parties have agreed a Bulk Submission for non-BAU activity, the Requestor shall state BULK in the Additional Information (D8213) of the Data Transactions used to initiate the relevant Requests.

Where Trading Parties agree to use a Deferral as part of a Bulk Submission, the T213.W (Start Service Request Deferral) shall include the Request Deferral Code (D8229) RETAILER and the statement BULK in the Additional Information (D8213).

Appendix 1

Bulk Submission Agreement

For use by Wholesalers and Retailers

This form shall be used to record any Bulk Submission agreed between a Contracting Retailer and a Contracting Wholesaler for non-BAU activity. Where a Bulk Submission has been agreed, either Trading Party may initiate the confirmation process by completing section 1 and either section 2 (Retailer) or section 3 (Wholesaler) of this form, before requesting the other to complete the relevant remaining declaration section.

Please note that sections 2 and 3 of this form may contain or lead to the identification of personal data.

1. Bulk Submission Agreement	
Insert new rows for additional information if required.	
Agreed start date	
Agreed completion date	
Number of Requests to be completed	
Reason for Bulk Submission	
Method to update on progress	

2. Declaration - Retailer	
I hereby acknowledge and declare that the information provided in this form is correct to the best of my knowledge and up to date at the time of signature.	
Signature	
Date (dd/mm/yyyy)	
Full name (in capitals)	

Role in the company or job title	
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3. Declaration - Wholesaler

I hereby acknowledge and declare that the information provided in this form is correct to the best of my knowledge and up to date at the time of signature.

Signature	
Date (dd/mm/yyyy)	
Full name (in capitals)	
Role in the company or job title	

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