

# WHOLESALE-RETAIL CODE CHANGE PROPOSAL/ CHARGING CHANGE PROPOSAL

<b>Change Proposal Reference</b> <i>(To be completed by the Panel Secretary)</i>	<b>CPW028</b>	Version No	<b>1</b>
<b>Type of Change Proposal:</b> <i>(delete as appropriate)</i>	Change Proposal		
	<del>Charging Change Proposal</del>		
<b>Submission Date</b>	24 November 2017		
<b>Title:</b> of Change Proposal/Charging Change Proposal	Unpaired SPIDs		
<b>Summary:</b> of Change Proposal/Charging Change Proposal <i>(40 to 50 Words Maximum)</i>	There are a high number of incorrectly unpaired SPIDs in the market. The change proposal seeks to enable better utilisation and visibility of existing data items & obtain new functionality to provide useful query display & reporting capabilities. This will support data improvement and sustainable management of SPID pairing in future.		
<b>General Details of the Proposer</b>			
<b>Name of Proposer</b>	Paul Stelfox		
Capacity (to submit Change Proposals and Charging Change Proposals – on behalf of a Party, as a Panel member, as the customer representative, or the Market Operator or on behalf of the Authority; or Charging Change Proposals – on behalf of a Wholesaler).	On behalf of United Utilities Water Limited (Wholesaler)		
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The Proposer recommends that this Change Proposal/Charging Change Proposal should initially: <i>(delete as appropriate)</i>	<del>Proceed to Assessment</del>		
	Proceed to Consultation		
	<del>Proceed to Recommendation</del>		
<b>Is the change Urgent (Yes/No)?</b> If yes, please provide reason for urgency (if applicable)	Yes – incorrectly unpaired SPIDs has been identified as the highest priority data issue by wholesaler Trading Parties at the recent (September 2017) User Forum.		

## Related Documents

Reference of any associated Code Panel Change Proposal/ Charging Change Proposal

Not applicable

Documents Accompanying Form

## Change Proposal/ Charging Change Proposal Details

Description of (i) the issue or defect which this Change Proposal seeks to address, or (ii) the modified or new charging method or charging structure required pursuant to this Charging Change Proposal, as required under the Market Arrangements Code Section 6.2.1(b).

The Unpaired SPID report currently highlights a high volume of unpaired SPIDs (circa. 450,000). It is recognised that this is a position that needs to be improved and sustained by Wholesalers.

In order for the market to function correctly and for accurate, complete and consistent data to be effectively maintained via market transactions, wholesalers must ensure that SPIDs for different service categories, which are associated with a single eligible premises, are correctly paired on a single SPID Core.

The Unpaired SPIDs that are currently reported have been assessed to fall into the following categories (albeit this is not an exhaustive list):

1. Water SPIDs that are genuinely without a Sewerage SPID (e.g. a trough or fountain may not require a paired sewerage SPID)
2. Sewerage SPIDs that are genuinely without a paired Water SPID (e.g. a site with private borehole or landfill site with no water supply)
3. Sewerage SPIDs that are a tenant SPID with SWHD services only, that could/should have a Landlord SPID populated to reference the SPID with water/sewerage services.
4. Water or Sewerage SPIDs that are cross-border with Welsh companies, and the other SPID is not eligible, and therefore the SPID is genuinely unpaired.
5. Water or Sewerage SPIDs that are cross-company (both companies are in the Market) and for one reason or another the other SPID has not been registered or paired correctly.
6. Water or Sewerage SPIDs that are single-company (both SPIDs with same company) and for one reason or another the other SPID has not been registered or paired correctly.
7. SPIDs of the same service category at the same premises, where the services have been incorrectly spread across multiple SPIDs (e.g. one sewer SPID with measured sewerage, paired with a Water SPID, and then another unpaired Sewerage SPID with SWHD).

Categories 1 to 4 are considered compliant from a market code perspective, but it is not currently possible to record this fact in CMOS once the SPID has been initially uploaded. In the case of category 3, it would be possible to derive this 'genuine unpaired SPID' information for a tenant SPID, based on the presence or absence of the Landlord SPID reference, but in the other cases an explicit capability is required.

The lack of visibility of genuinely unpaired SPIDs in the Market Data Sets and the CMOS portal is an issue that prevents the effective identification of, and differentiation between, SPIDs that are genuinely or incorrectly unpaired.

Category 5 is challenging to rectify as it is not possible for one wholesaler to see unpaired SPIDs of another wholesaler that might be required to be paired with one of their own.

Categories 6 & 7 are more prevalent within individual wholesaler areas. A high number of SPIDs were uploaded into the market by trading parties during the initial data upload, at which time data item D2086 Pairing Reason Code, was required for MPs to assert a reason for a SPID being without a pair, where one was known to be without its pair. Trading parties had no options to distinguish between different “unpaired” categories. Furthermore, this data item is not accessible from within CMOS or the MDS files.

This change request therefore seeks to:

- Create visibility of D2009, D2086, D2091 & D4018 in the CMOS portal and the MDS reports.
- Enable wholesalers to update D2009, D2086 & D4018 by processing transactions.
- Provide a greater range of options for wholesalers to state why a SPID may be genuinely unpaired consequently utilising D2086.
- Provide supporting capabilities to allow wholesalers to see other wholesaler SPIDs, in areas where cross-company SPIDs are likely to occur.

Description of the Change Proposal/ Charging Change Proposal, its nature and purpose and (for Change Proposals only) how it is consistent with the Principles and falls within the Objectives noted below, as required under the Market Arrangements Code Section 6.2.1(c).

The proposed change seeks to enable better utilisation of existing data items (specifically D2009 Pairing Reference, D2086 Pairing Reason Code, D2091 Other SPID & D4018 Other Wholesaler Id); as originally intended by the market codes by allowing these to be visible in the CMOS portal & MDS report. The change proposed also seeks to allow these data fields to be updated by wholesaler transactions. In addition to this a further change seeks to enable wholesalers to view bordering SPIDs within agreed boundaries with neighbouring wholesalers.

With regards to D2009, D2086, D2091, the proposed requirements are:

1. Provide visibility of Pairing Reference & Pairing Reason Code in the CMOS portal. This will enable users to interactively confirm the wholesaler data items are correctly set and stored in CMOS.
2. Include Pairing Reference, Pairing Reason Code & Other SPID in the MDS reports. This will enable wholesalers to apply automated verification techniques and data profiling of the unpaired SPID reason code. It will also provide value-add to retailers to provide assurances to them that they are not erroneously missing a SPID in their market profiling and customer relationship management. If the Other SPID (D2091) field is populated it will indicate that the SPID is paired & the SPID it is paired with. This requires a change to CSD 0302 (Standing Report & Data Extracts), section 2, for the WSPID and SSPID reports.
3. Add 4 new values for D2086 which will be NE\_NOSEWERAGE, NE\_NOWATER, NE\_LANDLORD, and NE\_CROSSBORDER. This will allow more informed rationale to be provided by wholesalers for why a SPID might be genuinely unpaired.
4. The following amendment to CSD 0104 (Maintain SPID data), to add new section 12.1.1 (c) “updates to the pairing reason code”

With regards to D4018, the proposed requirements are:

5. Provide visibility of the other wholesaler ID in the CMOS portal. This will enable users to interactively confirm the wholesaler data item is correctly set and stored in CMOS.
6. CMOS to preserve the D4018 value provided by a wholesaler, even if the other wholesaler fails to register their SPID or for whatever reason, it fails to correctly pair.

- In this way, if D2086 is <blank>, and D4018 is populated with another wholesaler id that is not the same as the wholesaler id of D4025 (Wholesaler ID), then it becomes very easy to systematically profile for SPID Cores that do not have both SPIDs, but the population of D4018 was the expectation of one of the wholesalers to be a paired SPID.
7. In the transaction required to update data item D2086 (see item 4 above) if the pairing reason code is set as NE\_CROSSBORDER then D2009 (Pairing Reference) & D2091 (Other SPID) must be NULL. D4018 can be populated with the intended other wholesaler or can be NULL. This would be an addition to CSD0301.
  8. The following amendment to CSD 0104 (Maintain SPID data), to add new section 12.1.1 (d) “updates to the other wholesaler ID” to provide guidance on the correct usage of D4018 other wholesaler id.

With regards to D2009, D2086 & D4018, the proposed transaction capabilities are:

9. Introduce a transaction capability to maintain D2009 Pairing Reference, D2086 Pairing Reason Code & D4018 Other Wholesaler ID, This will enable wholesalers to start utilising the extended code list to update the Pairing Reference & Pairing Reason Code with added value rationale, & the Other Wholesaler ID with the intended other wholesaler. At the moment the market enables the setting of these value in the T101.W, but does not facilitate subsequent maintenance of this data item. This will require a change to CSD 0301 (Data Catalogue) for the definition of a new transaction. The new transaction to specifically target these data items will be T155.W (Update Pairing Details), further details are defined below.
  - T155.W (Update Pairing Details)

<b>Transaction Number</b>	<b>T155.W</b>	
<b>Transaction Name</b>	Update Pairing Details	
<b>From</b>	Wholesaler	
<b>To</b>	Market Operator	
<b>Data Item Number</b>	<b>Name</b>	<b>Notes</b>
<b>D2001</b>	SPID	Required
<b>D4006</b>	Effective From Date	Required
<b>D2009</b>	Pairing Reference	Required only on change
<b>D2086</b>	Pairing Reference Reason Code	Required only on change
<b>D4018</b>	Other Wholesaler ID	Required only on change
<b>D4003</b>	Text Comment Field	Optional
<b>Description</b>	Wholesaler update to pairing details	

<b>Additional Notes</b>		
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- T155.M (Notify Pairing Details)

<b>Transaction Number</b>	T155.M	
<b>Transaction Name</b>	Notify Pairing Details	
<b>From</b>	Market Operator	
<b>To</b>	Other Wholesaler, Retailer, Other Retailer, Incoming Retailer	
<b>Data Item Number</b>	<b>Name</b>	<b>Notes</b>
D2001	SPID	Will be included
D4006	Effective From Date	Will be included
D2009	Pairing Reference	Will be included if provided in T155.W
D2086	Pairing Reference Reason Code	Will be included if provided in T155.W
D4018	Other Wholesaler ID	Will be included if provided in T155.W
D4003	Text Comment Field	Will be included if provided in T155.W
<b>Description</b>	Notification to Trading Parties of updates to the pairing details	
<b>Additional Notes</b>		

10. When the Other Wholesaler ID is updated/populated with the T155.W, the Other Wholesaler will receive a T155.M (as per the standard CMOS behavior). In addition to this, a T137.M (Request Confirmation of Any Services) will be sent. This will allow the Other Wholesaler the opportunity to respond to the request using the T137.W (Notify Confirmation of Any Services). This will, in effect, mimic the process that happens when a T101.W is submitted with the Other Wholesaler ID populated. Thus, when a T137.M is received, the Other Wholesaler can confirm that there are other services provided and proceed with pairing, or can confirm that there are no other services provided. Based on this response (if no services are provided), the Wholesaler that submitted the initial

T155.W can update the Pairing Reference Reason Code to something suitable which reflects that the SPIDs are genuinely unpaired.

Furthermore, the proposed change seeks to allow the sharing of information between wholesalers via the CMOS portal and CMOS MDS reporting to provide useful query, display and reporting capabilities to maximise the use of the information held in D2009, D2086 and D4018, and provide additional utilities to support cross-company SPID analysis. These include:

11. Agreement between wholesalers created in CMOS which allows wholesalers to see each other's SPIDs in the CMOS portal. The agreement will also allow MDS\_WSPID, MDS\_SSPID, MDS\_METER & MDS\_MNETS reports generated for one wholesaler to be generated for the other wholesaler.

With regards to the Unpaired SPIDs report defined in CSD0302 the change proposal seeks to make the following change:

12. Exclude SPIDs from the unpaired SPIDs report which are unpaired with a pairing reference reason code of: NE\_NOSEWERAGE, NE\_NOWATER, NE\_CROSSBORDER, NE\_LANDLORD & NOTELIGIBLE. This would result in any SPID which is unpaired and has any of the above reason codes to be excluded from the report.
13. Remove the T137.M condition from the unpaired SPIDs report. Currently CMOS will create a T137.M business transaction step when the Other Wholesaler has been populated in the T101.W. The report (based on how it is defined in CSD0302), will look at the T137.M and then establish if the SPID should be included or not. If no Other Wholesaler has been included in the T101.W, no business transaction step will be created for T137.M, and therefore the SPID will not appear in the unpaired SPIDs report. There was also no T137.Ms created at the initial SPID upload. These reasons contribute to there being a discrepancy in the number of unpaired SPIDs reported between the report in CMOS, and the one produced by the MOSL digital team.  
By removing the T137.M condition, we believe the report will correctly report on all unpaired SPIDs that should be paired irrespective of why the SPIDs are unpaired. The unpaired SPID report should therefore have the below conditions:
  - SPID is unpaired
  - Pairing Reference Reason Code is not NE\_NOSEWERAGE, NE\_NOWATER, NE\_CROSSBORDER, NE\_LANDLORD & NOTELIGIBLE

In addition to these changes the proposal seeks to make an amendment to CSD0301 around the behaviour of D2009 & D2091 when both fields are completed but with inconsistent data.

14. Currently, CSD 0301 (in the notes for T101.W) specifies that if both D2009 and D2091 are provided, CMOS will consider D2091 as the principal key and pair the SPID with the SPID identified in D2091 even if the pairing reference is of another SPID. This is not desirable functionality as it promotes inconsistency. We propose an additional validation which will reject the T101.W if both D2009 and the D2091 are provided and they point to different SPIDs. If both of these data items are provided & relate to the same SPID the T101.W will be accepted.

## Principles and Objectives

Description of the principles and objectives affected by the Change Proposal on the items below (if applicable) as detailed in Part A of Schedule 1 Part 1: Objectives Principles and Definitions.

Principles	Affected (Y/N)	Description
Efficiency	Y	<p>The change will allow wholesalers to see &amp; amend the pairing reason code in the CMOS portal thus allowing previously unpaired SPIDs to be identified &amp; paired. By pairing all SPIDs &amp; correctly marking unpaired SPIDs this will help wholesalers fulfil their statutory duties under their wholesale contracts.</p> <p>Reduction in the number of unpaired SPIDs will reduce bilateral data queries between retailer to wholesaler.</p>
Proportionality	N	
Transparency	Y	<p>Providing visibility of the Pairing Reason Code in the CMOS portal &amp; MDS report will allow this data item to be accessible to retailers.</p>
Simplicity, cost-effectiveness and security	Y	<p>Allowing the other wholesaler ID field to be updated by transaction will send a market transaction to the other wholesaler &amp; allow for simpler pairing.</p>
Barriers to entry	Y	<p>A reduction in unpaired SPIDs will give retailers more assurance that they are quoting based on the correct SPIDs. This will remove some uncertainty from the market which may have been seen by retailers as barriers to entry.</p>
Non-discrimination	N	
Customer participation	N	

Customer contact	Y	A reduction in unpaired SPIDs will reduce the likelihood of unwanted contact to retailers from their customers after switching has taken place. For example customer still receiving invoices from 2 different retailers due to unpaired SPIDs.
Seamless markets	Y	When pairing cross border SPIDs the customer will not be aware of the pairing activity going on in CMOS. They will also be unaware when SPIDs are marked as not eligible for pairing.  The changes will support a more positive customer switching experience.
No limit on upstream competition	N	
Business Terms Objectives	Y	The change will enhance to use of the Pairing Reason Code & Other Wholesaler ID fields
Operational Terms Objectives	Y	The change will facilitate the performance by the contracting wholesaler to pair up unpaired SPIDs.
Market Terms Objectives	Y	The change will ease the registration of data, increase confidence in the transfer process of non-household customers & enable the calculation of the correct charges for settlement.
Description of the impact of the Change Proposal/ Charging Change Proposal on the following items, as required under the Market Arrangements Code Sections 6.2.1 (f), (g) and (h).		
Configured Item	Impacted (Y/N)	Description
Schedule 1: Terms and Conditions of a Wholesale Contract	N	



Wholesale-Retail Code, Schedule 1 Part 1 (Objectives, Definitions and Principles)	Y	A positive impact on the market terms as described below.
Wholesale-Retail Code, Schedule 1 Part 2 (Business Terms)	N	
Wholesale-Retail Code, Schedule 1 Part 3 (Operational Terms)	N	
Wholesale-Retail Code, Schedule 1 Part 4 (Market Terms)	Y	The change will enhance the transfers of Non-Household Customers from the Contracting Retailer to another Retailer. The change will also improve the calculation of primary charges being recovered by Contracting Wholesalers from Contracting Retailers.
Wholesale-Retail Code, Schedule 1 Part 5 (CSDs)	Y	<ul style="list-style-type: none"> <li>• CSD 0302 (Standing Report &amp; Data Extracts),</li> <li>• CSD 0301 (data catalogue)</li> <li>• CSD 0104 (Maintain SPID data)</li> </ul>
Wholesale-Retail Code, Schedule 1 Part 6 (Operational Forms)	N	
Appointment	N	
Licence	N	
Any other industry code, agreement or document (e.g. the Wholesale Contract or the MOSL Articles) (please specify)	N	
Central Market Operating System	Y	CMOS will need to allow updates to D2086 & D4018 data fields in another transaction outside the T101.W
Trading Party systems which interface with Central Systems and other relevant Trading Party systems/ business processes.	Y	Wholesalers will need to update functionality of their back end systems to send transactions for D2086 & D4018 updates

Scottish Core Industry Documents	N	
<b>Further Information</b>		
Description of any discussions on the topic of the Change Proposal/ Charging Change Proposal at the User Forum (as relevant) or otherwise relevant discussions with parties, as required under the Market Arrangements Code Section 6.2.1(i).		
<p>Identified by Wholesale Trading Parties at the September MOSL User Forum as highest priority data issue impacting the market.</p> <p>Presented to Wholesale Interface Group where the detail of the problem and proposed remedial action was agreed.</p> <p>Presented the output at the October MOSL User Forum and gained agreement for next steps.</p> <p>MOSL review and identification of any additional elements to be included in change proposal - TBC</p>		
<b>Further Comments</b>		
<p>For avoidance of doubt United Utilities Water Limited uses the term cross-border when referring to Wholesalers that share SPIDs with Wholesalers that are not in the open market. United Utilities Water Limited uses the term cross-company when referring to Wholesalers that share SPIDs with Wholesalers that are both in the open market.</p>		

<b>Key</b>	
	To be completed by the Market Operator
	To be completed by the Proposer