

# WHOLESALE-RETAIL CODE CHANGE PROPOSAL/ CHARGING CHANGE PROPOSAL

<b>Change Proposal Reference</b> <i>(To be completed by the Panel Secretary)</i>	<b>CPW104</b>	Version No	<b>2.0</b>
<b>Type of Change Proposal:</b> <i>(delete as appropriate)</i>	Change Proposal		
	<del>Charging Change Proposal</del>		
<b>Submission Date</b>			
<b>Title:</b> of Change Proposal/Charging Change Proposal	Housekeeping changes to facilitate the Performance Regime introduced in April 2020		
<b>Summary:</b> of Change Proposal/Charging Change Proposal <i>(40 to 50 Words Maximum)</i>	Following the implementation of CPW078 in April 2020, CSD 0302 and CSD 0202 have to be updated to reflect the intended change in invoicing timeframes, the intended change in the MPS 18 time parameter, as well as the change in the read window for the Meter Read Submission process. Furthermore CSD 0002 needs to be updated as the proposed waiving of MPS 18 charges should apply to charges arising in November 2020 and not July 2020.		
<b>General Details of the Proposer</b>			
Name of Proposer	Sam Webb		
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).	Market Operator		
Contact Email	samantha.webb@mosl.co.uk		
Telephone Number	07498 604236		
The Proposer recommends that this Change Proposal/Charging Change Proposal should: <i>(delete as appropriate)</i>	<del>Proceed to Assessment</del>		
	<del>Proceed to Consultation</del>		
	Proceed to Recommendation		
Is the change Urgent (Yes/No)?	No		

If yes, please indicate which urgency principle(s) apply along with a rationale. Any supporting evidence should be included as an attachment to the Change Proposal form.		
Principle	Applies (Y/N)	Rationale
A significant impact on a party or parties, consumers or other stakeholder(s)	N	
A significant impact on the safety and security of the Central Market Operating System	N	
A material and immediate risk of causing a significant impact on the development and/or operation of the business retail market	N	
The code modification is required to comply with implement any Law	N	
If the change is Urgent please provide the proposed implementation date and the justification for this		
Proposed Implementation Date		
Justification		
<b>Related Documents</b>		
Reference of any associated Code Panel Change Proposal/ Charging Change Proposal	<a href="#">CPW078/CPM20 'Priority Performance Regime Changes for April 2020'</a>	
Documents Accompanying Form		
<b>Change Proposal/ Charging Change Proposal Details</b>		
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).		
This change seeks to update <a href="#">CSD 0302</a> , <a href="#">CSD 0202</a> , and <a href="#">CSD 0002</a> , in order to align with the changes made by <a href="#">CPW078/CPM20 'Priority Performance Regime Changes for April 2020'</a> , which was implemented in April 2020.		

Sections 9.2.2 and 9.2.3 of [CSD 0302 'standing reports and data extracts'](#) (v6.0) currently state that *'The Market Operator provides detailed Market Performance Standard Reports no later than the 10th Business Day of the Month.'* and *'The Market Operator provides an aggregated Market Performance Standard Report no later than the 10th Business Day of the Month.'* These timelines are not in line with those proposed by CPW078.

Similarly, Section 10.2.1 which currently states that *'Within fifteen (15) Business Days of the end of each month, the Market Operator shall compile and publish the Operational Performance Standards Peer Comparison Report on its website.'* and Section 11.2.2, which currently states that *'The Market Operator provides the Market Performance Standard Charges Reports no later than the 10th Business Day of the Month'* do not reflect the timelines set out in CPW078.

Finally, section 11.2.1, which states that *'The Market Operator calculates charges against the Market Performance Standards monthly, on or after the sixth Business Day of the Month, for the preceding Month, in accordance with CSD 0002 (Market Performance Framework)'*, does not align to the timeline set out in CSD 0002 in accordance with CPW078.

The second document to feature in this housekeeping change is [CSD 0202 'meter read submission: process'](#) (v3.0). Section 3.5.2. (a) reads *'the minimum Regular Cyclic Read frequency [...] shall be at intervals of between one hundred (100) and one hundred and forty (140) Business Days'*. However, CPW078 extended Time Parameter 1 from 140 business days to 200 business days and removed Time Parameter 2, and as such this section needs amending.

Section 4.1.6. (b) also needs updated, as it currently states *'The Meter Read Date must be within +/- two (2) Business Days of the relevant Registration Start Date'* despite. CPW078 extending the Time Parameter window for actual reads to 10 business days. This change was reflected in [CSD 0002 'market performance framework'](#) (v13.0) but not CSD 0202.

The last and most significant inaccuracy that this change seeks to address is the wording in CSD 0002 (v13.0), Table 1 Page 45, where in the Notes column for MPS 18 it reads;- *'Meters where the last meter read date is the same or earlier than the Go Live Date will be excluded, on a one-time basis, from the calculation of MPS 18 charges for performance in July 2020.'*

This waiving was set out in CPW078,-with the Draft Recommendation Report (Page 8) for CPW078/Priority Changes stating that: *'there would be a legacy long unread meter "event" 29th July 2020 (i.e. 200 business days after the last Time Parameter 2 event prior to 1st April 2020 on 14th October 2019).'*

However, it has now come to light that there was a miscalculation in the Draft Recommendation Report, and so the actual date these meters will appear will be the 2nd of November 2020 (which coincides with MPS charges resuming after COVID-19). As such the month set out in the Notes column for MPS 18 in CSD 0002, Table 1 Page 45, needs to be amended from July to November otherwise Retailers will be charged contradictory to the intent of CPW078.

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 invoicing timeframes in CSD 0302 need to be updated to be in line with CPW078. This means that the detailed and aggregated Market Performance Standard Reports as well as the Market Performance Standard Charges Reports and the Operational Performance Standards Peer Comparison Report have to be provided no later than the 16th Business Day of the Month.

The charges against the Market Performance Standards are to be calculated on or after the 11th Business Day of the Month.

CSD 0202 needs to be amended so that the minimum Regular Cyclic Read frequency is set at intervals of between 100 and one hundred and 200 Business Days. The drafting also needs to reflect that the Meter Read Date for Transfer Reads submitted using Meter Read Method "Visual" or "Remote" is within two (2) BD before the latest Registration Start Date up until seven (7) BD after the latest Registration Start Date.

To resolve the issue of charges exclusion, the wording in CSD 0002 must replace the word 'July' with the word 'November'. This change would need to be implemented before the 10th BD of December (14/12/20) to ensure it is in force before MPS is run for that month, charging for failures seen in November.

## 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/N	
Proportionality	Y/N	
Transparency	Y	The implementation of these housekeeping changes means that the CSD would be coherent with CPW078.
Simplicity, cost-effectiveness and security	Y	If not implemented by 14/12/20, charges of approx. £146,000 will have to be paid which would have a material impact on Retailers.
Barriers to entry	Y/N	
Non-discrimination	Y/N	
Customer participation	Y/N	
Customer contact	Y/N	
Seamless markets	Y/N	
No limit on upstream competition	Y/N	
Business Terms Objectives		

Operational Terms Objectives	Y	This change helps to facilitate the correct application of clause 1.3.1. of CSD 0002.
Market Terms Objectives		
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)	N	
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)	N	
Wholesale-Retail Code, Schedule 1 Part 5 (CSDs)	Y	CSD 0002 Table 1 page 45; CSD 0202 Sections 3.5.2. (a) and 4.1.6. (b); CSD 0302 Sections 9.2.2, 9.2.3., 10.2.1., 11.2.1. and 11.2.2.
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	N	

Trading Party systems which interface with Central Systems and other relevant Trading Party systems/ business processes.	N	
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).		
Further Comments		

<b>Key</b>	