

WHOLESALE-RETAIL CODE CHANGE PROPOSAL

Change Proposal Reference <i>(To be completed by the Panel Secretary)</i>	CPW077	Version No	0.2
Type of Change Proposal: <i>(delete as appropriate)</i>	Change Proposal		
	Charging Change Proposal		
Submission Date	18 September 2019		
Title: of Change Proposal	Indicator on Trade Effluent Sample Strengths		
Summary: of Change Proposal <i>(40 to 50 Words Maximum)</i>	This change proposal seeks to add indicators within the Central Systems (CMOS) against the current Chemical Oxygen Demand (Ot) and Suspended Solids (St) values to highlight the methodology used by wholesalers to establish chargeable effluent strength.		
General Details of the Proposer			
Name of Proposer	Carl Elsworth		
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 the Trade Effluent Issues Committee (TEIC)		
Contact Email	Carl.elsworth@water-plus.co.uk		
Telephone Number	07703718177		
The Proposer recommends that this Change Proposal should initially: <i>(delete as appropriate)</i>	Proceed to Assessment		
	Proceed to Consultation		
	Proceed to Recommendation		
Is the change Urgent (Yes/No)? If yes, please provide reason for urgency (if applicable)	No		

Related Documents	
Reference of any associated Code Panel Change Proposal	N/A
Documents Accompanying Form	
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).	
<p>This change proposal seeks to add indicators within CMOS against the current Ot and St values to highlight the methodology used by wholesalers to establish chargeable effluent strengths (eg Agreed Strength, Regional Strength, 6 monthly Average, 12 monthly average etc). Retailers currently have no visibility of this within CMOS and where asked the question by customers, they are reliant on having to contact wholesalers to ask the specifics each and every time. The change should reduce the need for bi-lateral communication in these situations and allow swifter customer query resolution directly from retailers.</p> <p>The codes allow for each wholesaler to apply this calculation however they see fit, all wholesalers will do it slightly differently and to further compound the problem each wholesaler will likely have multiple different methods they apply within their own regions. Likewise, there is no specific obligation for wholesalers to provide the details on each of the separate calculation methodologies. Retailers have ZERO visibility of any of this background information so when questioned by customers have no choice but to raise bilateral query with wholesalers in order to obtain it</p> <p>Currently in CMOS only current Ot and St values are displayed, there is no supporting detail of how the numbers have been calculated by the wholesaler or any indication of the time period they are likely to be applicable for.</p> <p>The impact of absence of this information within CMOS creates unnecessary delays for retailers when addressing these issues, which should be an easy process. Although the severity of this issue is low and retailers can peruse the Form G/01 to ascertain this information, we believe that creating an indicator in CMOS can remove the excessive contact with wholesalers whilst ensuring that customer queries are resolved in a quick manner. Although the financial materiality of this issue is difficult to measure and assess, on average we (Waterplus) receive 4 queries on a monthly basis pertaining to trade effluent sample strengths.</p>	
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).	
<p>The proposed solution seeks to create a new data item into the T121.W (Submit DPID) and T122.W (Update Trade Effluent Operating Data) transactions with the list of valid entries for sampling methodologies. It is worth noting that subsequent .M transactions issued by the Market Operator, for the respective transactions shall also be amended to incorporate the new data item. The new data item will allow wholesalers to select the preferred choice of sampling methodology</p>	

for the respective Discharge Points (DPIDs). The table below shows the entirety of the sampling methodologies compiled by wholesalers;

- No MOGDEN Charge
- Standard Strength
- Continuous Fixed Strength
- 1YR Fixed Strength
- 3YR Fixed Strength
- Seasonal Strength
- Settlement Period Strength
- 12-month Rolling Average
- 6-month Rolling Average
- 3-month Rolling Average
- Sample Number Rolling Average
- Most Recent Actual Sample
- OTHER
- UNDEFINED

The proposed solution also seeks to amend the MDS_DPIDs report to hold the new data item. The amendment of MDS_DPIDs report will be essential in ensuring that retailers are kept informed of any changes to the different sampling methodology. Although each wholesaler is permitted to use its own methodology to determine the charging strength, the TEIC believes this solution would be more beneficial as trading parties could report on the different sampling methods for wholesalers.

A data initialisation exercise shall also be carried out to ensure that all existing DPIDs are updated. Wholesalers may undertake a data cleanse exercise to update the respective data items in CMOS as part of their BAU processes.

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	An efficient process to ensured that information is shared.
Proportionality	Y	
Transparency	Y	Delivers clarity to retailers and customers on the sample methodology and provide information on the next review date.
Simplicity, cost-effectiveness and security	Y	A simple change to the central systems even though the estimated cost is likely to be high.
Barriers to entry	N	

Non-discrimination	N	
Customer participation	Y	Delivers greater customer experience via quicker query resolution route.
Customer contact	N	
Seamless markets	N	
No limit on upstream competition	N	
Business Terms Objectives	N	
Operational Terms Objectives	Y	
Market Terms Objectives	N	
Description of the impact of the 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	<ul style="list-style-type: none"> • CSD 0206 Trade Effluent Process; • CSD 0301 Data Catalogue; and • CSD 0302 Standing Reports and Data Extracts
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	Amendments to T121.W (Submit DPID), T122.W (Update TE Operating Data) and subsequent .M transactions
Trading Party systems which interface with Central Systems and other relevant Trading Party systems/ business processes.	Y	
Scottish Core Industry Documents	N	

Further Information

Description of any discussions on the topic of the 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

Key

	To be completed by the Market Operator
	To be completed by the Proposer