

# WHOLESALE-RETAIL CODE CHANGE PROPOSAL/ CHARGING CHANGE PROPOSAL

<b>Change Proposal Reference</b> <i>(To be completed by the Panel Secretary)</i>	<b>CPW026</b>	Version No	<b>1.0</b>
<b>Type of Change Proposal:</b> <i>(delete as appropriate)</i>	Change Proposal		
	<del>Charging Change Proposal</del>		
<b>Submission Date</b>	7 <sup>th</sup> November 2017		
<b>Title:</b> of Change Proposal/Charging Change Proposal	Removing SPID version design		
<b>Summary:</b> of Change Proposal/Charging Change Proposal <i>(40 to 50 Words Maximum)</i>	This Change Proposal removes the concept of SPID version from the market codes which will result in all SPIDs having their version as version "1", which cannot be incremented.		
<b>General Details of the Proposer</b>			
Name of Proposer	Mihai Ciurba		
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 Analyst MOSL		
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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>		
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/ Charging Change Proposal

Not applicable

Documents Accompanying Form

Drafting:

- CSD 0105 Error Rectification and Retrospective Amendments
- CSD 0301 Data Catalogue

## 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).

### Background

The SPID format is described in CSD 0301: Data Catalogue (Appendix A) and is an integral part of the non-household retail market design. The SPID number is used to identify Eligible Premises (for Water and Sewerage Services) in the market and is what gets transferred from a Retailer to any other Retailer when a switch takes place.

As currently defined in CSD 0301, a SPID is composed of four (4) parts concatenated into a single, unique, thirteen (13) character string, where each part of a SPID is as follows:

- 1) **SPID Core:** This is comprised of two sub-parts:
  - a. **SPID Core Serial Part:** This is the serial number generated upon adding a Supply Point to the Supply Point Register and identifies a Supply Point without making a distinction between Water or Sewerage Services – the SPID Core is thus unique to each Eligible Premises. This serial number is a nine (9) digit integer.
  - b. **Core Check Code:** This check code enables error detection for the SPID Core and must always be used. The check code is a single character and may either be an integer (0 – 9) or the letter “X”.
- 2) **Category:** This identifies the Service Category of the SPID. W for Water and S for Sewerage.
- 3) **Version:** This identifies the version of the SPID, allowing Deregistered SPIDs to be Registered again with the version number incremented. The version will be a single integer. The first version of a SPID will be “1”. If, exceptionally, over nine (9) versions of a Supply Point are required – then the Supply Point (and its paired Supply Point) will need to be deregistered, and new Supply Points with new SPIDs created.
- 4) **Check code:** The check code enables error detection and is an intrinsic part of the SPID. The check code must always be used. The check code is a single character and may either be an integer (0 – 9) or the letter “X”.

The SPID will therefore have a total length of thirteen (13) characters, and be comprised of the integers (0 – 9) and the letters “W”, “S” and “X”.

## **SPID version design**

The design consideration behind the SPID version (item (3) above) is to allow, under certain specific circumstances, for more than one iteration of a SPID Core on a single Service Category at an Eligible Premises. This means that the version number within the SPID number is incremented on registering a new Supply Point at an Eligible Premises that already has a Deregistered Supply Point of the same Service Category.

In practical terms, the way SPID versioning was intended to work is that an initial SPID is requested through a T101.W (Request New SPID). A SPID number is created by CMOS (consider 3900058210W16 as an example) and following this Trading Parties submit SPID data as relevant, pair the Supply Point, and can make the SPID Tradable. An important pre-requisite for SPID versioning is that the Supply Point needs to be paired. SPID versioning was not intended to work on Supply Points which do not have a pair of the other Service Category (i.e. unpaired Supply Points), as it was designed to remove the need to recreate the SPID of the other Service Category than the one being Deregistered. There is no benefit in having SPID versioning for unpaired Supply Points. Using the SPID given as an example above, the Sewerage SPID paired with the Water SPID will be 3900058210S13.

At a certain point following SPID creation, the Water SPID may become Deregistered using a T115.W/TCORR115.W (Declare Disconnection /Reconnection /Deregistration). This effectively removes the ability for the Wholesaler and Retailer to carry out any updates to the SPID. If the SPID was subsequently deemed to have been Deregistered in error and a desire to have the SPID re-instated is identified, then following Deregistration, a new Water SPID request (T101.W) is submitted by the Wholesaler for the same Service Category at the same Eligible Premises. The pairing details on the T101.W must refer to the existing paired service and the new Water SPID is created as a different version (i.e. version 2, 3, 4, etc. in the 12th digit of the SPID format – depending of what version the previous Deregistered SPID had) but with the same SPID Core. Using the SPID given above, the next version of the SPID (version 2, as the previous version was version 1) would be 3900058210W24. The last digit of the SPID also changes value as it represents a check digit, which takes into consideration all the previous values in the sequence. Following the creation of the second version of the SPID, Trading Parties can submit SPID data as relevant and make the SPID Tradable. For the avoidance of doubt, the incremented version of the Water SPID will be already paired with the existing Sewerage SPID (i.e. 3900058210W24 will be paired with 3900058210S13).

Only the latest version of the SPID will be an active SPID, and all the previous versions must be Deregistered. Therefore, it is possible to have only one 'active' SPID of a particular Service Category (water or sewerage) at an Eligible Premises.

## **SPID versioning benefit**

The only significant difference between creating a new SPID using a different core, and creating an incremented version of the SPID using the same core, is that when creating the incremented version of the SPID, the Wholesaler, or Other Wholesaler as relevant, does not have to recreate the SPID of the other Service Category.

As an example, consider a Sewerage SPID (3900058210S13) for which charges are derived by using the volumes recorded by meters installed at the paired Water SPID (3900058210W16). Assume that the Sewerage SPID is incorrectly Deregistered. As it is not permissible to reverse the Deregistration of a Supply Point, if SPID versioning is supported, the Wholesaler will request a new Sewerage SPID at the same Eligible Premises which will be generated as version 2 (3900058210S21) and automatically linked to the existing (version 1) Water SPID (3900058210W16). The Sewerage Wholesaler would still have to add sewerage service components, discharge points, and any other relevant attributes, but the Sewerage SPID would be

paired with the existing Water SPID and no changes are needed with respect to the Water SPID. The incremented SPID version functionality saves the Wholesaler of the other Service Category from the need to Deregister a valid Supply Point and recreate it from scratch due to the incorrect Deregistration of the paired SPID. It does not save the Wholesaler of the erroneously Deregistered SPID from having to create a new Supply Point (but with the same SPID Core as before).

If SPID versioning is not supported, following the erroneous Deregistration of the Sewerage SPID, the Water Wholesaler would have to Deregister the Water SPID as well (which has, as a prerequisite, submission of Final Reads for all meters registered at the Supply Point), and recreate the pair (including any meters and service components). Recreating the Water SPID is required as the Sewerage SPID uses the water volumes to derive charges.

Where a Water SPID had been Deregistered (in error), the normal Deregistration process would have required the Meters to have been removed and hence any recreation of a Water SPID would require new meter records to be created and associated with the new Water SPID.

The principal driver behind SPID version design has been to minimise the impact on the Other SPID when the SPID has been erroneously Deregistered.

### **The issue that this Change Proposal wishes to resolve**

As mentioned above, it is a valid business scenario, as per the current provisions in the market codes, to have more than one Water SPID (or Sewerage SPID) at the same Eligible Premises, but at different times (i.e. the versions cannot overlap), and these will be represented as different versions.

CMOS does not currently fully support different versions of the SPID. While the T101.W may cause the SPID version number to increase following Deregistration and subsequent registration of a new SPID (at the same SPID Core and with the same Service Category as the Deregistered one); the functionality to process the correct version of the SPID throughout CMOS is not in place. One of the reasons for this is that the logic within CMOS is looking at the SPID Core, rather than the entire SPID number, and hence it cannot differentiate between different versions of the SPID based upon the SPID Core. There is currently a preventive measure in place within CMOS (added in June 2017) which uses a validation rule that stops Supply Points from being re-requested at the same SPID Core (if the previous SPID has been Deregistered). This in effect stops SPID versions to increment.

The argument put forward as part of this Change Proposal is that fully implementing SPID versioning in CMOS would:

- Require extensive changes across all areas of CMOS, in effect re-architecting the design of CMOS;
- Require full regression testing of all CMOS transactions, processes, settlement calculations, MPF calculations, search and retrieval, and reporting output;
- Potentially require full regression testing of all Trading Party back-end, middleware and reporting across transactions, processes, settlements, MPF reports and uploads, data search and retrieval, and reporting output;
- CGI have determined that fully implementing SPID versioning in CMOS would likely need to be considered as a dedicated major release and will likely not be available for testing until after Q1-2018;
- A large proportion of CGI resources will need to work on SPID versioning, which may potentially slow the rate of fixing defects and put future, planned, CMOS releases at risk.

The Proposer argues that the above impacts pose a significant design, development and testing risk on CMOS and potentially Trading Party systems, and outweighs the benefits of implementing SPID versioning. Prior to implementing the preventive measure in CMOS, there were 202 SPIDs

created with a version above 1 in the period October 2016 – June 2017 (8 months). The Proposer argues that this number shows a very minimal usage of the SPID versioning functionality, one which does not justify the development of SPID versioning in CMOS when faced with the risks mentioned above.

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).

Based on the issues identified above, it is proposed that the SPID versioning functionality is not invoked. The existing CMOS functionality will be retained and the current preventive measure, which involves stopping Supply Points from being re-requested at the same SPID Core (if the previous SPID has been Deregistered), will be maintained. This effectively means that SPID versions will never increment and will always be 1. As a consequence, SPID versioning design will need to be completely removed from CMOS.

The Change Proposal argues that the following benefits will be attained by not invoking the SPID versioning functionality:

- Minimal changes within CMOS;
- Minimal regression testing;
- The Market Operator will produce guidance and clarification documentation for Trading Parties' use and management of multiple instances of different Supply Points at the same Eligible Premises, but with a different SPID number. The Proposer argues that this guidance will remove current uncertainties around managing Deregistered Supply Points and will confirm enduring functionality with respect to handling Deregistered Supply Points;

The Proposer also assumes (but will be clarified through the Industry Consultation) that:

- No change will be required to Trading Party back-end or middleware systems, as they are already handling version "1" of a SPID;
- Trading Parties, under the current preventive measure, should be already invoking a process for managing Deregistered Supply Points, so by removing SPID versioning there should be no additional processes required.

As such, not implementing the SPID versioning design as described in CSD 0301 will greatly reduce the risk faced by the market as a consequence of extensive changes needed in CMOS if SPID versioning is to be implemented.

In relation to all of the above, the following amendments are proposed to the market codes:

### **CSD 0105 Error Rectification and Retrospective Amendments**

#### *Section 3.2.8*

Where a Trading Party wishes to correct a Data Item, but it is not permissible to directly correct that specific Data Item, the Data Owner may re-create the data. **For example, if a meter has been incorrectly Deregistered, the Wholesaler may notify replacement meter data; or if a Supply Point has been incorrectly Deregistered, the Wholesaler may request a New Supply Point with a different SPID Core. In the case of incorrectly Deregistered Supply Points, all affected Trading Parties Registered to the Water Services Supply Point and the Sewerage Services Supply Point at the Eligible Premises agree to co-operate with each other in relation to the Registration of New Supply Points. For example, if a Supply Point has been incorrectly Deregistered, the Wholesaler may**

~~request a replacement Supply Point; or if a meter has been incorrectly Deregistered, the Wholesaler may notify replacement meter Data Items.~~

## CSD 0301 Data Catalogue

Appendix A section A.1.1 (c)

~~Version This identifies the version of the SPID and will always be "1"., allowing Deregistered SPIDs to be Registered again with the version number incremented. The version will be a single integer. The first version of a SPID will be "1". If, exceptionally, over nine (9) versions of a Supply Point are required — then the Supply Point (and its paired Supply Point) will need to be deregistered, and new Supply Points with new SPIDs created.~~

## 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	Not implementing the SPID versioning functionality greatly reduces the risk faced by the market as a consequence of extensive changes needed in the Central Systems if SPID versioning is to be implemented. In addition, as implementing SPID versioning is considered a very resource intensive activity, the Proposer believes that resources, including potentially Trading Party resources, could be better allocated to other areas if SPID versioning is not developed.
Proportionality		
Transparency	Y	By removing the SPID versioning functionality, the market codes will be more clearly expressed and will be in alignment with the functionality that is available in the Central Systems. As such, there will be no discrepancy between what the market codes prescribe (which, at the moment, allow for SPID versioning to take place) and what the Central Systems

		have been designed to deliver (which do not allow for SPID versioning to take place).
Simplicity, cost-effectiveness and security	Y	Removing the SPID versioning functionality from the market codes will provide further clarity and simplify the processes which are allowed on Deregistered SPIDs.
Barriers to entry		
Non-discrimination		
Customer participation		
Customer contact		
Seamless markets		
No limit on upstream competition		
Business Terms Objectives		
Operational Terms Objectives		
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		
Wholesale-Retail Code, Schedule 1 Part 1 (Objectives, Definitions and Principles)		
Wholesale-Retail Code, Schedule 1 Part 2 (Business Terms)		
Wholesale-Retail Code, Schedule 1 Part 3 (Operational Terms)		
Wholesale-Retail Code, Schedule 1 Part 4 (Market Terms)		

Wholesale-Retail Code, Schedule 1 Part 5 (CSDs)	Y	CSD 0105 Error Rectification and Retrospective Amendments CSD 0301 Data Catalogue
Wholesale-Retail Code, Schedule 1 Part 6 (Operational Forms)		
Appointment		
Licence		
Any other industry code, agreement or document (e.g. the Wholesale Contract or the MOSL Articles) (please specify)		
Central Market Operating System	N	By not invoking the SPID versioning functionality, no changes will be required in the Central Systems.
Trading Party systems which interface with Central Systems and other relevant Trading Party systems/ business processes.	TBC	The impact of removing the SPID versioning functionality on Trading Parties by will be understood through the Industry Consultation.
Scottish Core Industry Documents		

### Further Information

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

### Key

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