

WHOLESALE-RETAIL CODE CHANGE PROPOSAL/ CHARGING CHANGE PROPOSAL

For use by the Panel

Change Proposal Reference <i>(To be completed by the Panel Secretary)</i>	CPW020	Version No	1.0
Submission: <i>(delete as appropriate)</i>	Change Proposal		
	Charging Change Proposal		
Title: of Change Proposal/ Charging Change Proposal	Proposal to amend the wording in the F02 Complaint Form		
Summary: of Change Proposal/ Charging Change Proposal <i>(no more than two sentences)</i>	The proposal seeks to allow for the Retailer to provide consent for a Wholesaler to make contact with the Non Household Customer direct in relation to an F02 Complaint Form. This is an extension of existing permissions that can already be granted by the Retailer.		
Status of the Change Proposal/Charging Change Proposal <i>(To be completed by the Panel Secretary)</i>			
First Time Published	23/06/2017	Rejected	
Assessment		OFWAT - Further Information required	
Consultation		OFWAT - Approved	
Recommendation		OFWAT - Rejected	
Further Information Required		Approved and Implemented	
General Details of the Proposer			
Name of Proposer	Patrick Hargreaves		
Capacity (for Change Proposals – on behalf of a Party, as a Panel member, as the customer representative or on behalf of MOSL or the Authority; for Charging Change Proposals – on behalf of a Wholesaler).	Wholesaler		
Contact Email; Tel/Mob.	Patrick.Hargreaves@yorkshirewater.co.uk 07790 617755		
The Proposer recommends that this Change Proposal/Charging Change Proposal should: <i>(delete as appropriate)</i>	Proceed to Assessment		
	Proceed to Consultation		
	Proceed to Recommendation		

<p>Rationale for recommendation and any reason for urgency</p>	<p>Whilst we appreciate that the Retailer is responsible for managing a Non Household Customer complaint, we believe that for complaints it would be beneficial for not only for the Wholesaler to be able to, with the consent of the Retailer, arrange visits to premises direct with Non Household Customer but, to make contact with the Non Household Customer in relation to the complaint in general.</p> <p>The reasoning for this is that for matters such as complaints there is often the need to speak with the complainant to ensure that the true nature of the complaint can be understood. This will ensure that the Wholesaler collates and provides the Retailer with all the correct information such that the Retailer can respond to their customer.</p> <p>By granting permission for the Wholesaler to make contact direct with the Non Household Customer it will minimise the number of communications needed between Wholesaler and Retailer in order to determine the exact nature of the complaint and for the Wholesaler to be able to respond efficiently to the Retailer request for information.</p>
<p>Related Documents</p>	
<p>Reference of any associated Panel Change Proposal/ Charging Change Proposal</p>	<p>None</p>
<p>Documents Accompanying Form</p>	<p>Proposed F-02 Form</p>
<p>Change Proposal/ Charging Change Proposal Details</p>	
<p>Description of (i) The enhancement, 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>	
<p>(i) The proposal seeks to clarify and improve the complaints process. By ensuring the complaint is fully understood, will allow the Wholesaler to respond in a timely matter with all the required information to resolve the Non Household customer's complaint. The proposal clarifies the responsibilities and obligations when the Retailer gives the Wholesaler consent to contact the Non Household direct to resolve the issue</p> <p>(ii) The change proposal does not modify or change the charging method or structure.</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).

The change proposal only impacts the Complaints F02 Form and the F5 Process in the Operational Terms. The nature of the change is that of a change in wording only as follows:

Form

Section 4

Consent to contact the Non-Household Customer

The Wholesaler may wish to contact the Non-Household Customer to ~~discuss the matter further or if required~~ to arrange a visit to the premises. Please indicate whether Consent to contact ~~you give consent~~ for the Wholesaler to contact the Non-Household Customer directly. ~~to arrange a visit to the premises.~~

The remainder of this section 4 and the Form as a whole remains unchanged.

Attached to this change proposal form is the proposed F02 Complaints Form, identifying the minor changes required.

Operational Terms – Process F5

Step 3

The Wholesaler shall acknowledge the complaint and report to the Retailer within **five (5)** Business Days of its receipt of the complaint. The report shall provide at least the following information:

- Retailer ID;
- SPID(s) where relevant;
- **any communications with the Non Household Customer;**
- complaint reference number or numbers where more than one Non-Household Customer has complained concerning the same or a related incident; and
- any resolution available to the Non-Household Customer complaint.

This change proposal only allows the Wholesaler to contact the Non Household Customer to discuss the detail and nature of the complaint if the Retailer provides the consent to do so. It clarifies the existing consent where the Retailer grants permission to the Wholesaler to contact the Non Household Customer direct to arrange the site visit.

The F02 Complaints Form template will need to be updated by MOSL, Retailers and Wholesalers (all Trading Parties), however this is expected to be a relatively minor change that will clarify responsibilities and benefit Retailers, Wholesalers and customers. It will also require and update to the Operational Terms.

Principles and Objectives		
Principles	Affected (Y/N)	Description
Efficiency	Y	Allows for direct contact between Wholesaler and customers after the initial complaint has been made to the Retailer by the Non Household Customer.
Proportionality	Y	A small change to the wording of the F-02 Form and the Operational Terms. Proposed F02 attached to the Change proposal.
Transparency	Y	Visibility via the proposed changes to the F02 Form and the Operational Terms.
Simplicity, cost-effectiveness and security	Y	This proposed change only impacts the F02 Form and the Operational Terms with respect to a working change. This change will not impact the Codes or CMOS. The change seeks to improve the process by minor word changes in the F02 Form.
Barriers to entry	N	
Non- discrimination	N	
Customer participation	Y	
Customer contact	Y	
Seamless markets	Y	
No limit on upstream competition	Y	
Business Terms Objectives	N	
Operational Terms Objectives	N	
Market Terms Objectives	N	
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(e), (f) and (g).		
Configured Item	Impacted (Y/N)	Description

Wholesale-Retail Code, Part 1 (Objectives, Definitions and Principles)	N	
Wholesale-Retail Code, Part 2 (Business Terms)	N	
Wholesale-Retail Code, Part 3 (Operational Terms)	Y	Additional wording to Process F5.
Wholesale-Retail Code, Part 4 (Market Terms)	N	
Wholesale-Retail Code, Part 5 (CSDs)	N	
Wholesale-Retail Code, Part 6 (Operational Forms)	Y	Minor amendment to the wording in the Form.
Appointment	N	
Licence	N	
Any other industry code, agreement or document (e.g. the Wholesale Contract or the MOSL Articles) (please specify)	N	
Central System	N	
Trading Party systems which interface with Central Systems and other relevant Trading Party systems/ business processes.	Y	The proposal is seeking to make minor amendments to the wording used in Form F02 – Complaints Form.
Scottish Core Industry Documents	N	
Impact Assessment		
General Comment Pre-go live, consideration of the timing of adoption and implementation of the change may be relevant.	As this is a changing to the wording of a Form we believe that this is in effect a housekeeping type change and as such, could be implemented expediently following due process in terms of change control.	
Cost/Benefit Estimate		

<p>Financial Benefit Estimate (Low: < £10K, Medium: £10K To £100K, High : > £100K)</p>	<p>-</p>
<p>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(h).</p>	
<p>This proposal has been discussed at the recent MOPWG meeting, both Wholesaler and Retailers at this meeting supported the change request as does the Consumer Council for Water.</p>	
<p>Further Comments</p>	
<p>This minor modification to the wording on the Form and additional wording in the Operational Terms will facilitate the resolution of customer complaints by clarifying arrangements for the Wholesaler to make contact with the customer direct once the initial complaint has been raised by the Retailer. It will ensure that the Wholesaler has a clear understanding of the nature of the complaint such that they can consolidate all the information needed by the Retailer to allow the Retailer to provide a meaningful response to the Non Household Customer.</p> <p>As these changes are in effect changes wording on the Form only, it has no impact on the Codes or to CMOS.</p> <p>The proposal does not intend to change the relationship that exists between the Retailer and their Non-household Customer in terms of the complaints process. The proposal clarifies the Retailer consent that allows the Wholesaler to contact their customer to discuss the complaint and not just to arrange, if required, a visit to the premise.</p> <p>We have circulated this change request to our portfolio manager Liz D’Arcy and Zainab Mohammed prior to submission to the Panel.</p>	