

# MARKET CODE / OPERATIONAL CODE CHANGE PROPOSAL

Form  
version 3.0

Change Proposal reference  
(To be completed by the TP Sec.)

**MCCP321**

Version No.

**B.1**

## PART A — SUBMISSION

### A.1. GENERAL DETAILS

A.1.a. TITLE	Scottish Water read types and estimated reads		
A.1.b. COMPANY	Scottish Water		
Change Proposals must be authorised by the person designated by the signatory to the Market Code Framework / Accession Agreement			
A.1.c. AUTHORISED SIGNATURE		NAME	Richard Lavery
A.1.d. CONTACT NAME	Stephen McIntosh	CONTACT EMAIL; TEL/MOB.	Stephen.mcintosh@scottishwater.co.uk
A.1.e. ASSOCIATED MCCP / OCCP	MCCP315 Smart Metering – New Meter and Meter Read Types		
A.1.f. ASSOCIATED DOCS.	CSD0202 (Meter Read Submission)		
A.1.g. PROPOSED URGENCY	NON-URGENT		
A.1.h. REASONS FOR URGENCY			

The CMA CEO will review this information and make a decision as to whether to take this MCCP / OCCP forward as urgent as defined under Market Code Part 8.9.1

## **A.2. MCCP / OCCP DETAILS**

### **A.2.a. ISSUE OR DEFECT WHICH THIS MCCP / OCCP SEEKS TO ADDRESS** Required under Market Code Parts 8.7.1 (ii) (b) and 8.8.1 (ii) (b)

MCCP315 (Approved at the August TP) will introduce the required changes to accommodate Smart Metering and also included changes to meter Read Types and the introduction of a new Meter Read Method data item.

This means, following the March 2026 CMA release every meter read submission will need to include both a Read Type (the purpose of the read) and a Meter Read Method (how the read was obtained).

MCCP315 introduced a number of valid Read Type and Meter Read Method combinations to take account of the smart metering changes and updated existing Read Types to take account of the new Meter Read Method (e.g. removal of the “Estimated Transfer Read” Read Type as there is a Read Type of “Transfer Read” and a Meter Read Method of “Estimated”).

MCCP315 focused on the changes required to support Smart Metering and reflected the circumstances in which the Market framework already permits estimated rather than actual reads. There are additional scenarios where it is custom and practice in the Market for meter reads to be estimated by Scottish Water because it is physically impossible to obtain an actual meter reading, but these scenarios are not currently reflected in the Market Code or CSDs.

Below are typical examples of where providing an actual read is not possible and estimated reads are being provided across many of the Scottish Water read types:

- Where a backdated meter read must be provided to enable the Central Systems to process a historic change which was not notified by the customer at the time and which has been identified via a (significantly) backdated change applied by the Assessor related to changes at metered premises, e.g. premises splits and merges resulting in meter moves, deregistrations (premises changed from non-domestic to domestic) etc. In these scenarios, by the time the Market is made aware of the premises change it is too late to obtain an actual meter reading, so Scottish Water must estimate the reading at the time of the premises reconfiguration based on the latest available reading(s).
- Where there is a physical issue with the meter (i.e. it has been damaged, removed etc.).
- Correction of market data e.g. incorrect read taken, dispute over the effective date of a change (e.g. Deregistration, shared supply set-up etc.)

In these circumstances a reading is required by the Central Systems to process settlement but it is not physically possible to obtain an actual meter reading so an estimate must be provided instead. To accurately reflect current working practices in the market, the Read Type / Meter Read Method valid combinations need to be extended to include all Read Types and the Meter Read Method of “Estimated” where it can apply.

A.2.b. DESCRIPTION OF THE NATURE AND PURPOSE OF THE MCCP / OCCP AND HOW IT MEETS THE MARKET CODE / OPERATIONAL CODE OBJECTIVES AND PRINCIPLES FOR THE MARKET DOCUMENTS  
Required under Market Code Parts 8.7.1 (ii) (c) and 8.8.1 (ii) (c)

#### General Description

Scottish Water are proposing that changes are made the CSDs to:

- Update the valid circumstances where a Meter Read Method of Estimated can be submitted;
- Update the valid Read Type and Meter Read Method combinations. Enabling the Meter Read Method of “Estimated” to be applied to relevant Read Types in all circumstances where estimation is happening (or may need to happen).

This will ensure that all scenarios are covered, and the market data will be accurate and clear for all meter read submissions when the changes being introduced by MCCP315 take effect.

Outlined below in red are the changes highlighting the circumstances in which Estimated as a valid Meter Read Method would apply (CSD0202 section 2.2.1) and the proposed updated valid Read Type / Meter Read Method combinations (CSD0202 Section 2.2.2).

#### **Changes to CSD's**

##### *CSD0202 – Section 2.2.1*

#### **Smart**

A Meter Read Method of “Smart” denotes that the Meter Read was obtained from a Smart Meter by means of either AMR or AMI technology.

#### **Estimated**

A Meter Read Method of “Estimated” denotes that the Meter Read was estimated due to:

- (a) in the event of a Transfer, the circumstances defined in CSD0102
- (b) in the event of a meter exchange, Disconnection, meter removal or Deregistration, where a meter has been previously removed and disposed of by a Customer, premises owner or a party working on their behalf or other external agency, or the meter is damaged so that a ~~Physical~~ Visual or Smart ~~Remote~~ Read cannot be obtained.
- (c) In the event of a Temporarily Disconnected meter being illegally reconnected by the customer prior to the site visit and the reconnection is to be processed from the estimated date of reconnection rather than the date of discovery.
- (d) In the event of a premises reconfiguration or change of use identified by the Scottish Assessors Association (e.g. merge or removal from the non-domestic valuation roll) resulting in the movement or removal of meters to a defined effective date with backdated effect published at the Scottish Assessors Association.

##### *CSD0202 – Section 2.2.2*

#### **2.2.2 Valid Meter Read Type and Method combinations**

The table below summarises the valid combinations of Meter Read Type and Meter Read Method. Certain combinations are only permissible in limited circumstances, as set out in this CSD.

Meter Read Type	Meter Read Name	Valid Meter Read Methods
I	Initial Read	Visual Smart Estimated

F	Final Read	Visual Smart Estimated
D	Dereg Read	Visual Smart Estimated
E	End Read	Visual Smart Estimated
O	Opening Read	Visual
X	Temporary Disconnection	Visual Smart
Y	Reconnection	Visual Smart Estimated
C	Regular Cyclic Read	Visual Smart Customer Datalogger
T	Transfer Read	Visual Smart Estimated

Principles and Objectives affected  
CMA Guidance Note GN009 may be referred to for assistance with this section

PRINCIPLE	AFFECTED (Y/N)	DESCRIPTION
Proportionality	Y	To reflect existing practices where a read is required for settlement but it is physically impossible to obtain an actual reading
Transparency	Y	Provides market participants with visibility of how meter reads have been obtained across all read types
Simplicity, Cost-effectiveness, and Security	Y	Should be a build on existing market change submitted as part of MCCP315
Non-exclusivity	N	
Barriers to Entry	N	
Customer Contact	N	
Non-discrimination	N	
Non-detrimental to SW Core Functions	N	

MC / OC OBJECTIVES		
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A.2.c. IMPACT Required under Market Code Parts 8.7.1 (ii) (d), (f) and (g), and 8.8.1 (ii) (d) and (f)		
CONFIGURED ITEM	IMPACTED (Y/N)	DESCRIPTION
MC / OC	Y	Drafting changes to provisions on meter read methods and meter read types.
CSDs	Y	Drafting changes to provisions on meter read methods and meter read types.
Wholesale Services Agreements	N	
Licenses	N	
CMA Central Systems	Y	Changes to validation to accommodate updated valid Read Type / Meter Read Method combinations
CMA business processes	Y	Changes to transaction validation to accommodate updated valid Read Type / Meter Read Method combinations
Trading Party systems	N	
Trading party business processes	N	

A.2.d. DRAFT LEGAL TEXT Required under Market Code Parts 8.7.1 (ii) (d) and 8.8.1 (ii) (d)		
<p><b><u>Changes to CSD's</u></b></p> <p><i>CSD0202 – Section 2.2.1</i></p> <p><b><u>Smart</u></b> A Meter Read Method of “Smart” denotes that the Meter Read was obtained from a Smart Meter by means of either AMR or AMI technology.</p> <p><b><u>Estimated</u></b> A Meter Read Method of “Estimated” denotes that the Meter Read was estimated due to:</p> <p>(a) in the event of a Transfer, the circumstances defined in CSD0102</p> <p>(b) in the event of a meter exchange, disconnection, meter removal or deregistration, where a meter has been previously removed and disposed of by a customer, premises owner or a party working on their behalf or other external agency, or the meter is damaged so that a <del>Physical</del> Visual or Smart <del>Remote</del> Read cannot be obtained.</p> <p>(c) In the event of a Temporarily Disconnected meter being illegally reconnected by the customer prior to the site visit and the reconnection is to be processed from the estimated date of reconnection rather than the date of discovery.</p> <p>(d) In the event of a premises reconfiguration or change of use identified by the Scottish Assessors</p>		

Association (e.g. Merge or removal from the non-domestic valuation roll) resulting in the movement or removal of meters to a defined effective date with backdated effect published at the Scottish Assessors Association.

## CSD0202 – Section 2.2.2

### **2.2.2 Valid Meter Read Type and Method combinations**

The table below summarises the valid combinations of Meter Read Type and Meter Read Method. Certain combinations are only permissible in limited circumstances, as set out in this CSD.

Meter Read Type	Meter Read Name	Valid Meter Read Methods
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F	Final Read	Visual Smart Estimated
D	Dereg Read	Visual Smart Estimated
E	End Read	Visual Smart Estimated
O	Opening Read	Visual
X	Temporary Disconnection	Visual Smart
Y	Reconnection	Visual Smart Estimated
C	Regular Cyclic Read	Visual Smart Customer Datalogger
T	Transfer Read	Visual Smart Estimated

If changes are identified for CSD0301 Data Transaction Catalogue Annex, these will not be provided in this MCCP, but will be provided following the deployment of the associated system updates. This is because the majority of CSD0301 Annex is system generated automatically and can only be updated after associated changes have been incorporated into the relevant system.

### **A.3. IMPLEMENTATION DETAILS**

<p><b>A.3.a. PROPOSED IMPLEMENTATION DATE OR LEAD TIME</b>  Timescale must not overlap with the period of consultation with the Commission and should take account of the impacts identified in Section A.2.c. Any quoted lead time should commence from date of Approval.</p>
<p>March 2026 Release</p>
<p><b>A.3.b. ANY LIMITATIONS OR DEPENDENCIES FOR IMPLEMENTATION</b></p>
<p><b>A.4. ANY OTHER COMMENTS</b></p>

## PART B — TP ASSESSMENT

### B.1. ASSESSMENT PROCESS

B.1.a. ASSESSMENT START DATE	2025-10-16	ASSESSMENT END DATE	2025-10-16
B.1.b. IMPACT ASSESSMENT REQUIREMENT	IA REQUIRED		
B.1.c. CONSULTATION REQUIREMENT	TP CONSULTATION NOT REQUIRED		
B.1.d. ASSOCIATED DOCUMENTS (TO THIS PART B)			

### B.2. ASSESSMENT DETAILS

#### B.2.a. CHANGE SPEC AND IMPACT (IF DIFFERENT FROM THAT ORIGINALLY SUBMITTED)

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#### B.2.b. CMA INTERNAL SYSTEMS IMPACT

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#### B.2.c. DRAFT LEGAL TEXT (IF DIFFERENT FROM THAT ORIGINALLY SUBMITTED)

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#### B.2.d. CUSTOMER IMPACT (TO BE COMPLETED BY LPS)

*There are scenarios where it is physically impossible to obtain an actual meter reading for a market change (e.g. meter has been damaged or previously removed; the meter read relates to a premises change of use which occurred in the past and has only just been notified by the customer or Scottish Assessors). It is existing practice in the Market for meter reads to be estimated by Scottish Water in these scenarios in the absence of any alternative option but these scenarios are not currently reflected in the Market Code or CSDs, an omission which is addressed by this change.*

*There is therefore no customer impact as a result of this change as it is codifying existing practice in the market framework and because there is no viable alternative approach available.*

#### B.2.e. TP ASSESSMENT

Taking into account complexity, importance and urgency, and having regard to whether or not such proposal is within the relevant Objectives and Principles as required under Market Code Parts 8.7.1 (v) and 8.8.1 (iv)

Impact on Principles and Objectives  
(if different from that originally submitted)

Cost Estimate

Benefit Estimate  
(L: < 10k, M: £10k to £100k, H: > £100k)



<b>B.3. TP DECISION</b>	TP APPROVED
<b>B.4. FINAL TP VIEWS</b>	Unanimously approved by the TP on 16 Oct 2025
<b>B.5. PLANNED IMPLEMENTATION DATE</b>	2026-03

WITHDRAWN BY PROPOSER?	No
COMMENTS	
DATE OF WITHDRAWAL	

## PART C — COMMISSION APPROVAL

<b>C.1. DATE FINAL REPORT ISSUED TO COMMISSION</b>	2025-11-28
<b>C.2. APPROVAL STATUS</b>	APPROVED CHANGE / REJECTED
<b>C.3. DATE OF APPROVAL STATUS</b>	yyyy-mm-dd
<b>C.4. COMMISSION RESPONSE REFERENCE</b>	

## PART D — IMPLEMENTATION

<b>D.1. IMPLEMENTATION DATE</b>	2026-03
<b>D.2. IMPLEMENTATION DETAILS</b> (MC version, CSD versions, CMA Central Systems release number, etc.)	