

MARKET CODE / OPERATIONAL CODE CHANGE PROPOSAL

Form
version 3.0

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

OCCP074

Version No.

B.1

PART A — SUBMISSION

A.1. GENERAL DETAILS

A.1.a. TITLE	Process improvement for Scottish Water initiated Deregistration		
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	Richard Lavery	NAME	Richard Lavery
A.1.d. CONTACT NAME	Richard Lavery	CONTACT EMAIL; TEL/MOB.	richard.lavery@scottishwater.co.uk
A.1.e. ASSOCIATED MCCP / OCCP			
A.1.f. ASSOCIATED DOCS.			
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)

Process 31 of the Operational Code sets out the process for deregistration of a Supply Point initiated by Scottish Water (deregistration initiated by a Licensed Provider is covered separately in process 32). A Supply Point may need to be deregistered for a variety of reasons including:

- The premises has changed from a business to a household
- The premises has been merged with another premises (e.g. repurposing of industrial units)
- The Supply Point has been identified to be a duplicate, with two separate Supply Points referring to the same physical premises

Process 31 states that where Scottish Water identifies a Supply Point to be deregistered, it must notify the registered Licensed Provider and allow 20 Business Days for them to raise any concerns before making any change to data in the Central Systems.

In many cases, Licensed Providers respond to Scottish Water within the 20 Business Days to confirm their agreement with the proposed deregistration. Although it's not clear that it was the intention, the current drafting implies that even if the Licensed Provider responds to confirm their agreement, Scottish Water should still wait until the 20 Business Days have elapsed before processing transactions to notify the CMA of the deregistration.

CSD0104 (Section 3.2, Step a) specifies that the CMA is then notified within 2 business days of investigations or consultations being completed.

Current practice is to process the transaction to the CMA promptly following any confirmation by a Licensed Provider that they are in agreement with the proposed deregistration. Compared with waiting until the 20 Business Days have elapsed, this has the advantages of updating the accuracy of data in the Central Systems promptly and stopping wholesale charges to the Licensed Provider more quickly where it has been identified that a Supply Point or service is no longer valid.

An internal audit has highlighted that this practice is not consistent with the current Operational Code wording. The process can be amended to align with the exact current Operational Code wording but this would appear to have an adverse effect on service to Licensed Providers (and potentially to their customers) and on data quality in the Central Systems by delaying updates to market data and to wholesale charges. An amendment to the Operational Code to align with current practice is therefore proposed instead.

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

Process 31 is to be amended to clarify that if a Licensed Provider responds to Scottish Water within the 20 Business Day notice period to confirm their agreement with a proposed deregistration, Scottish Water will send transactions to notify the Central Systems within 2 Business Days of the Licensed Provider's response.

The reference to Licensed Providers notifying the CMA in Step 6 of the process has also been removed. This reference is redundant following the transfer of ownership of Service Element data items (such as Property Drainage) from Licensed Providers to Scottish Water many years ago.

Principles and Objectives affected CMA Guidance Note GN009 may be referred to for assistance with this section		
PRINCIPLE	AFFECTED (Y/N)	DESCRIPTION
Proportionality	Y	Minor amendment to Operational Code wording to formalise existing practice for the benefit of service and data quality.
Transparency	Y	Aligns Operational Code wording exactly with current practice
Simplicity, Cost-effectiveness, and Security	Y	Minor amendment to Operational Code wording to formalise existing practice for the benefit of service and data quality.
Non-exclusivity	N	Applies to all Licensed Providers and customer groups
Barriers to Entry	N	Creates no barriers to entry
Customer Contact	N	No change to customer contact
Non-discrimination	N	Applies to all Licensed Providers and customer groups
Non-detrimental to SW Core Functions	N	No effect on SW Core Functions
MC / OC OBJECTIVES		

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	Wording change to Process 31 of the Operational Code
CSDs	N	
Wholesale Services Agreements	N	
Licenses	N	
CMA Central Systems	N	
CMA business processes	N	
Trading Party systems	N	

Trading party business processes	N	Aligns wording exactly to current practice
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A.2.d. DRAFT LEGAL TEXT
Required under Market Code Parts 8.7.1 (ii) (d) and 8.8.1 (ii) (d)

Step 3

Where Scottish Water identifies the requirement to remove Service Elements or deregister the Supply Point(s) it shall, ~~at least 20 Business Days in advance of the notification to the CMA,~~ notify the Licensed Provider that it intends to remove Service Elements or deregister the Supply Point(s). Scottish Water's notification to the Licensed Provider will include the following:

- the Non-Household Customer's Supply Point ID;
- Scottish Water's reasons for the notification;
- details of the nature of the investigation;
- the findings and date of any visit to the premises;
- details of all Supply Points to be deregistered or Service Elements to be removed;
- the expected date of transactions to the CMA; and
- any relevant supporting information or evidence.

Step 4

The Licensed Provider may dispute Scottish Water's decision, providing the reason for dispute and any additional information, within 20 Business Days from the date of notification referred to in Step 3.

~~If the Licensed Provider responds within 20 Business Days of the date of the notification in Step 3 to confirm their agreement with the proposed deregistration, Scottish Water will notify the CMA in accordance with the Market Code.~~

If no response is received by Scottish Water within 20 Business Days of the date of ~~said~~ the notification ~~in Step 3~~, Scottish Water will notify the CMA of the removal of Service Elements or Deregistration of the Supply Point in accordance with the Market Code.

Step 5

Where the Licensed Provider disputes Scottish Water's decision, Scottish Water shall, within 10 Business Days of the date of the dispute by the Licensed Provider, notify the Licensed Provider that:

- the Licensed Provider's dispute will be upheld; or
- Scottish Water's decision to remove Service Elements or Deregister the Supply Point will be upheld; or
- further investigation is required in accordance with Step 1 of this process.

Step 6

Scottish Water ~~or the Licensed Provider~~ shall notify the CMA of the removal of Service Elements or Deregistration of the Supply Point in accordance with the Market Code.

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

A.3.a. PROPOSED IMPLEMENTATION DATE OR LEAD TIME
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.

Date of publication of next version of the Operational Code.

A.3.b. ANY LIMITATIONS OR DEPENDENCIES FOR IMPLEMENTATION

A.4. ANY OTHER COMMENTS

PART B — TP ASSESSMENT

B.1. ASSESSMENT PROCESS

B.1.a.	ASSESSMENT START DATE	2026-04-16	ASSESSMENT END DATE	2026-04-16
B.1.b.	IMPACT ASSESSMENT REQUIREMENT	IA NOT 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)

B.2.b. CMA INTERNAL SYSTEMS IMPACT

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

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

This change will allow Scottish Water to complete a Deregistration within the 20 Business Day Notice period, provide always that the LP has confirmed its consent for the deregistration within that period. This will ensure timely removal of any SPIDs that should not be in the Market and thus eliminating any unnecessary charges to customers.

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.3. TP DECISION

TP APPROVED

B.4. FINAL TP VIEWS

Unanimously approved by the TP 2026.04.16

B.5. PLANNED IMPLEMENTATION DATE

Next Operational Code Release (June 2026)

WITHDRAWN BY PROPOSER?	No
COMMENTS	
DATE OF WITHDRAWAL	

PART C — COMMISSION APPROVAL

C.1. DATE FINAL REPORT ISSUED TO COMMISSION	2026-05-21
C.2. APPROVAL STATUS	APPROVED CHANGE / REJECTED
C.3. DATE OF APPROVAL STATUS	yyyy-mm-dd
C.4. COMMISSION RESPONSE REFERENCE	

PART D — IMPLEMENTATION

D.1. IMPLEMENTATION DATE	June 2026
D.2. IMPLEMENTATION DETAILS (MC version, CSD versions, CMA Central Systems release number, etc.)	