MARKET CODE / OPERATIONAL CODE CHANGE PROPOSAL			Form version 2.2
Change Proposal reference (To be completed by the TP Sec.)	**MCCP176**	Version No.	**D.1**

PART A — SUBMISSION			
A.1. GENERAL DETAILS			
A.1.a. TITLE	ERRA Notifications		
A.1.b. COMPANY	CMA		
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	
A.1.d. CONTACT NAME	Neil Cohen	CONTACT EMAIL; TEL/MOB.	Neil.cohen@cmascotland.co.uk 0117 942 3272
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)

CSD0105 states the following:

Steps a and b: Identify and classify Data Items requiring amendment
If a Code Party other than the Data Owner becomes aware of an error or missing data:

    i.   in the case of a Trading Party they should contact the CMA. In particular, where the Trading Party is Scottish Water and the error pertains to the vacancy status of a Supply Point, Scottish Water may make an application to change the vacancy status of the Supply Point; provided that the Supply Point is marked as vacant in the Central Systems, and that the Supply Point is tradable or Temporarily Disconnected.

    ii.   in the case of the CMA, they will contact the Contract Manager for the Data Owner.

Where a Data Owner identifies, or is informed by the CMA, that SPID Data is incorrect or requires a late update in the Central Systems, the Data Owner will initially determine whether the change requires a Retrospective Amendment or an Error Rectification by reference to CSD0301 (Data Transaction Catalogue), wherein each item of SPID Data is shown as either capable of late submission or correction by Error Rectification or Retrospective Amendment.

Up until 2013, the approach adopted to comply with the above process was that, for Retrospective Amendments, a Non-Data Owner would actually submit a draft Retrospective Amendment and the CMA would forward such draft to the Data Owner and invite the Data Owner to ratify and formally submit the Amendment. This approach proved to be problematic and inefficient, in that the CMA found itself acting as an intermediary between the two Parties, adding to the administrative burden, but without adding any value and the Non-Data Owner incurred a time and effort burden, in that they were required to create the data file for the Retrospective Amendment.

From 2013 onwards, the CMA either passed on such requests, or more frequently, advised Parties that they should contact the Data Owner directly. This arrangement had the benefit that the Non-Data Owner did not necessarily need to complete the data file for the Retrospective Amendment and meant that the interested Parties could determine the need or otherwise for the Retrospective Amendment, without having to communicate via the CMA.

This revised process has worked well and has now been enshrined in the automated Retrospective Amendment process that is offered by the CMA as an Additional Service.

It should also be noted that, for Error Rectifications, Non-Data Owners have never identified potential corrections to the CMA and correctional transactions have simply been made by the Data Owners, as required.

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

This MCCP seeks to amend CSD0105 such that it more comprehensively describes the working arrangements that have always been used for Error Rectifications and have been in place for over two years for Retrospective Amendments.

A minor amendment is also included to more correctly reflect current RA processing.

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

PRINCIPLE	AFFECTED (Y/N)	DESCRIPTION
Proportionality	Y	This proposal merely seeks to clarify documentation. No development costs are involved.
Transparency	Y	CSD0105 will be made clearer, as regards ERRA notifications originating with Non-Data Owners.
Simplicity, Cost-effectiveness, and Security	N	
Non-exclusivity	N	
Barriers to Entry	N	
Customer Contact	N	
Non-discrimination	N	
Non-detrimental to SW Core Functions	N	
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	N	
CSDs	Y	See CSD0105 drafting

Wholesale Services Agreements	N	
Licenses	N	
CMA Central Systems	N	
CMA business processes	N	
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)

CSD0105should be amended as follows:

Steps a and b: Identify and classify Data Items requiring amendment
If a Code Party other than the Data Owner becomes aware of an error or missing data:
- i.   in the case of a Trading Party they should contact the ~~CMA~~ Data Owner.
- ii.   In ~~particular,~~ the case where the Trading Party is Scottish Water and the error pertains to the vacancy status of a Supply Point, Scottish Water may make an application to change the vacancy status of the Supply Point; provided that the Supply Point is marked as vacant in the Central Systems, and that the Supply Point is ~~t~~Tradable or Temporarily Disconnected.
- iii. in the case of the CMA, they will contact the ~~Contract Manager for the~~ Data Owner.

Where a Data Owner identifies, or is informed by ~~the CMA~~ another Party, that SPID Data is incorrect or requires a late update in the Central Systems, the Data Owner will initially determine whether the change requires a Retrospective Amendment or an Error Rectification by reference to CSD0301 (Data Transaction Catalogue), wherein each item of SPID Data is shown as either capable of late submission or correction by Error Rectification or Retrospective Amendment.

Step e (3)
Whether the proposed Retrospective Amendment is capable of being processed via an existing Data Transaction or whether it shall be processed ~~manually~~ as a Retrospective Amendment routine on the CMA CS by the CMA;

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.

August 2015

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	2015-03-25	ASSESSMENT END DATE	2015-06-25
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 SPECIFICATION AND IMPACT (if different from that originally submitted)			
B.2.b.	DRAFT LEGAL TEXT (if different from that originally submitted)			
B.2.c.	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		No cost (documentation change only)		
Benefit Estimate (L: < 10k, M: £10k to £100k, H: > £100k)				
B.3.	TP DECISION		TP APPROVED	

B.4. FINAL TP VIEWS	
B.5. PLANNED IMPLEMENTATION DATE	August 2015

WITHDRAWN BY PROPOSER?	No
COMMENTS	
DATE OF WITHDRAWAL	

PART C — COMMISSION APPROVAL	
C.1. DATE FINAL REPORT ISSUED TO COMMISSION	2015-06-30
C.2. APPROVAL STATUS	APPROVED CHANGE
C.3. DATE OF APPROVAL STATUS	2015-07-29
C.4. COMMISSION RESPONSE REFERENCE	

PART D — IMPLEMENTATION	
D.1. IMPLEMENTATION DATE	2015-08-25
D.2. IMPLEMENTATION DETAILS (MC version, CSD versions, CMA Central Systems release number, etc.)	
CSD0105 v5	