

## Market Code Schedule 6

Code Subsidiary Document No. 0001

## Market Training and Assurance

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## Change History

Version Number	Date of Issue	Reason For Change	Change Control Reference	Sections Affected
1.0	May 2007	First Publication		
1.0	Aug 2007	Errata and clarification		
1.1	08/08/2008	LVI self certification and associated changes	Commission Change	
1.2	13/08/2009	Amendment of CMA contact details	MCCP032	Annex A
1.3	27/09/2010	Housekeeping	MCCP064	
2.0	2014-02-05	Reissued and streamlined in order to fit better with current Market practice	MCCP139	All
3.0	2015-01-23	Additional step for CMA to require MRT re-execution.	MCCP164	Section 4
4.0	2015-03-31	Inclusion of missing Annexes	MCCP163	Annex A Annex B
5.0	2018-04-01	GDPR	MCCP221	
6.0	2022-09-22	Use of an Active Control List for HVI	MCCP278	Sections 4 and 5
7.0	2023-03-23	Addition of Cyber Essentials or ISO27001 Certification	MCCP286	All

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# 1. Introduction

## 1.1 Purpose and Scope of the Market Training & Assurance

This document sets out the Market obligations for; Training, Market Re-training, Market Assurance and Market Re-assurance, along with the associated processes for participating in the Retail Water and Wastewater Market in Scotland in order to trade under the Market Code.

## 1.2 CMA Role

The CMA will administer the Market Training, Market Re-training, Market Assurance and Market Re-assurance processes as set out in Sections 2, 3, 4 and 5 respectively. The CMA will also be required to administer Market Re-assurance in relation to one or more Trading Parties which operate a High Volume Interface where it is:

- Necessary to help resolve a Dispute; or
- Required in relation to a Trading Party who is persistently failing Performance Standards.

## 1.3 Low Volume Interface and High Volume Interface

The Central Systems offer both a Low Volume Interface (LVI) and a High Volume Interface (HVI). All Trading Parties are required to be able to use the Low Volume Interface. The Low Volume Interface allows Trading Parties to create Data Transactions by entering data into screen based forms individually. A High Volume Interface allows pre-constructed Data Transactions to be submitted to the CMA, either as individual Data Transactions or as a batch of Data Transactions by the Trading Party.

Trading Parties may choose to use a High Volume Interface if they consider it is appropriate to their proposed market volume. The Wholesaler uses a High Volume Interface for high volume transactions and Licensed Providers may also choose to use a High Volume Interface for high volume transactions.

Trading Parties that operate a High Volume Interface have a potential to disrupt other Trading Parties with one error being replicated numerous times. Trading Parties that operate using only the Low Volume Interface pose a reduced risk to other Trading Parties as a result of the following characteristics:

- Their level of activity is low or isolated; and
- Their inter-action with the CMA and/or the Wholesaler is limited.

For both LVI and HVI, Trading Parties will be required to establish and maintain Cyber Essentials or ISO27001 Certification.

From 1 April 2023, any failure to comply with these obligations will result in all access to the Central Systems being withdrawn until Cyber Essentials or ISO27001 Certification has been established or re-established.

Where a Trading Party has submitted an application for Cyber Essentials or ISO27001 Certification before 1 April 2023 and that application is still under consideration by the awarding body, that Trading Party shall have until 30 September 2023 to achieve Cyber Essentials or ISO27001 Certification before its access to the Central Systems is withdrawn.

## 2 Market Training

This section sets out the Market Training obligations and processes that must be completed by the CMA and by any new Licensed Provider intending to use a Low Volume Interface to carry out any operation in order to trade under the Market Code.

The purpose of Market Training is to ensure that a Licensed Provider can operate daily Market processes via the Low Volume Interface. The Market Training process is designed to include the submission of various daily transactions, to confirm connectivity between the Trading Party Systems and the Central Systems and to confirm that the organisation's system supporting these activities are subject to Cyber Essentials Certification or ISO27001 Certification.

### 2.1 CMA Obligations

The CMA will offer 3 days of free Market Training on the use of the Low Volume Interface to each Licensed Provider planning to enter the Market. The CMA will also provide some training regarding the data protection obligations described in the Market Code. Unless there are mitigating circumstances, any training will take place at the CMA's offices. A Licensed Provider may request additional training from the CMA, if required and the CMA may provide such additional training as an Additional Service, for which a charge may be levied.

The CMA will schedule training within 10 Business Days, if possible and in any event within 20 Business Days of receiving the request for training from a Licensed Provider. Such a request must be made by the Licensed Provider by submitting a duly completed form at Annex A.

On the second day of training by a Licensed Provider, the CMA will provide immediate Low Volume Interface access to the test Central Systems to enable a test registration of a Supply Point to be executed. This will enable the Licensed Provider to provide the CMA with a duly completed Self-Certification (as at Annex B), which the CMA must have received prior to allowing a Licensed Provider to execute any registrations of Supply Points pursuant to Section 5.2.2 of the Market Code.

### 2.2 Licensed Provider Obligations

Each Licensed Provider will be required to successfully complete the Training Process in order to be provided with Central Systems Low Volume Interface access. Each Licensed Provider will be required to Self-Certify its capability to comply with all Market Code obligations for which it obtains a Licence, before being able to register Supply Points, pursuant to Section 5.2.2 of the Market Code.

The first two days of training are a pre-requisite for Self-Certification. The third day of training should take place prior to the Licensed Provider registering a Supply Point on the Central Systems. On the Second day of training the Licensed Provider will be required to complete a short exercise; the Day Two Exercise to allow them to demonstrate their knowledge and competence of the LVI, this will involve being given access to a Central Systems test system so as to enable a test Supply Point registration to be executed.

To complete Self-Certification, the Licensed Provider must complete the Self - Certification declaration (at Annex B). This Self-Certification identifies that the Licensed Provider can use the Low Volume Interface, that it understands the processes set out in the Market Code and Code Subsidiary Documents, that it understands its responsibilities under the market framework, and that it has obtained Cyber Essentials Certification or ISO27001 Certification for systems supporting interactions via the LVI. Performance on the Day Two Exercise should be properly considered and taken into account by the Licensed Provider before completing a Self - Certification. The Licensed Provider must give the signed declaration to the CMA. The CMA will not be held responsible for any difficulty that a Licensed Provider encounters using the Low Volume Interface having certified its readiness to participate in the Market.

## 2.3 Market Training Process

### **Step a. Licensed Provider Requests Market Training.**

Between 14 Business Days and 33 Business Days prior to when a Licensed Provider wishes to register one or more Supply Points, a request for Market Training should be submitted to the CMA.

### **Step b. CMA Schedules Market Training.**

Between 10 Business Days and 20 Business Days after receiving a request from a Licensed Provider to receive Market Training, the CMA shall schedule such training.

### **Step c. Market Training.**

The CMA will provide Market Training over a period of 3 days, plus any additional time that may have been agreed as an Additional Service.

The training will comprise of:

- Presentation of the Market structure, the Market Code and Code Subsidiary Documents, covering
  - Performance Standards
  - Registering New Connections
  - Registration Transfers and Cancellations
  - Error Rectification and Retrospective Amendments

- Settlement Timetable and Reporting
- Meter Read Submissions
- Trade Effluent Processes
- Market Reports
- Data Protection
- An overview of the LVI
- LVI based scenario execution, covering:
  - Registering New Connections
  - Registration Transfers and Cancellations
  - SPID Updates
  - Meter Read Submissions
  - Trade Effluent Submissions
  - Customer Names Searches
  - Market Reports
- Completion of the Day Two Exercise, utilising access to the test Central Systems.

**Step d. Normal Operation.**

Subsequently, the CMA shall provide access to the Central Systems to enable the Licensed Provider to register Supply Points and to execute other associated processes via the Central Systems, as appropriate. The first such registration of a Supply Point may only take place following completion of Market Training.

Completion of Market Training is identified by receipt of a signed Self Certification by the CMA from the Licensed Provider and the successful test registration of a Supply Point.



## 3 Market Re-Training

This section sets out the Market Re-training obligations and processes that must be completed by the CMA and by any existing Trading Party wishing to continue to use a Low Volume Interface to trade under the Market Code following a change to Trading Party Systems, or Central Systems, that the CMA determines is sufficient to merit Market Re-training.

Whilst the requirement for Market Re-training is at the discretion of the CMA, the following circumstances indicate likely trigger events:

- Significant changes to the design of the Central Systems LVI
- Significant changes to the personnel at a Trading Party
- Notification by the Trading Party that Cyber Essentials Certification or ISO27001 Certification for systems supporting interactions via the LVI is no longer held.

The purpose of Market Re-training is to ensure that a Licensed Provider can continue to operate daily market processes via the Low Volume Interface. The Market Re-training process is designed to include the submission of various daily transactions, to re-confirm connectivity between the Trading Party Systems and the Central Systems, and to re-confirm that the systems used to support these processes are covered by Cyber Essentials Certification or ISO27001 Certification.

### 3.1 CMA Obligations

The CMA will determine where an Approved Change to the Market Code, or a change to a Trading Party system, requires Market Re-training. The CMA shall provide the Market Re-training according to a schedule that allows each Trading Party to complete the additional training within a reasonable time of the change taking effect.

The CMA will bear the cost of the Market Re-training.

On completion of Market Re-training, each Trading Party must provide the CMA with a duly completed Self-Certification (as at Annex B), which the CMA must have received prior to allowing such Trading Party to continue registering Supply Points pursuant to Section 5.2.2 of the Market Code.

### 3.2 Trading Party Obligations

Where an Approved Change to the Market Code or any change to the Central Systems, or to a Trading Party's systems, has a material effect on the Low Volume Interface, or when the Trading Party systems that support their interactions via the Low Volume Interface are no longer covered by Cyber Essentials Certification or ISO27001 Certification, the Trading Party

shall inform the CMA of such change and the CMA may require a Trading Party to undertake Market Re-training. This will be according to a schedule that allows a Trading Party to complete the Market Re-training within a reasonable time of the change taking effect and to Self-Certify its capability to comply with all Market Code obligations for which it is licensed, before being able to continue operating an LVI, pursuant to the Market Code.

### 3.4 Market Re -Training Process

#### **Step a. CMA Identifies a Need for Market Re-training.**

Following a notification from a Trading Party, or the identification by the CMA, that a change with a material effect on its LVI requires Market Re-training, the CMA will notify the Trading Party within a reasonable time before the change becomes effective of the Market Re-training that is required.

#### **Step b. Market Re-training.**

The CMA will provide Market Re-training, as required.

Completion of Market Training is identified by receipt of a signed Self Certification by the CMA from the Trading Party.

#### **Step c. Normal Operation.**

Subsequently, the CMA shall provide access to the Central Systems to enable the Trading Party to operate its LVI accordingly.

## 4 Market Assurance

This section sets out the Market Assurance obligations and process that must be completed by any Licensed Provider intending to use a High Volume Interface to carry out any operation covered by the Market Code. The Market Assurance process defines a number of obligations for the CMA, the Licensed Provider undertaking the Market Assurance process and Scottish Water.

The purpose of Market Assurance is to ensure that Trading Party systems can operate daily market processes via the High Volume Interface in conjunction with the Central Systems. Market Assurance is designed to include the processing of various daily transaction files to confirm connectivity between Trading Party Systems and the Central Systems. It is also designed to confirm that Data Transaction Flows utilising the HVI, whether they are successful or fail validation, are processed correctly by Trading Party systems. Market Assurance includes confirmation that systems supporting a Trading Party's interactions via the High Volume Interface are subject to Cyber Essentials Certification or ISO27001 Certification.

### 4.1 CMA Obligations

The CMA will carry out Market Assurance for a new or existing Licensed Provider which wishes to start using a High Volume Interface.

Within two Business Days of a Licensed Provider submitting a confirmation to the CMA, in which they must confirm that they have completed development and all planned testing of their High Volume Interface, that they have suitable change management arrangements in place, and that they have Cyber Essentials Certification or ISO27001 Certification for the systems that support interactions with the High Volume Interface, the CMA will provide a Market Assurance Test Specification. The Test Specification will contain the confirmed Market Assurance Commencement Date and details of the steps involved in Market Assurance, including pre-requisite steps and the tests that require to be executed. The Market Assurance Test Specification will also constitute the Market Assurance Test report and should be completed by the Licensed Provider and the CMA to indicate the success or failure of any specific test.

On the Market Assurance Commencement Date, which must be no more than 10 Business Days after the submission of the written notification from a Licensed Provider that they have completed development and all planned testing of their High Volume Interface, the CMA will request a list of IP addresses that the Market Participant may wish to use for the HVI (including any test environments and Market Continuity environments that the Participant may utilise). Having received such list, the CMA will then establish suitable access to a Central Systems test system and will commence Market Assurance Testing.

Market Assurance Testing will include a Data Transfer Capability Test (to ensure that the Trading Party system can communicate with the Central Systems via the HVI) and Market Scenario Tests which will cover all Data Transaction and Notification Flows for which the Licensed Provider intends to use the High Volume Interface. The outcome of each test should be duly recorded by the Licensed Provider and, where appropriate, by the CMA. The Licensed Provider will be authorised by the CMA to carry out via their High Volume Interface only those Transactions which have been subject to market Assurance Testing.

Within three Business Days of receiving the results of the Market Assurance Testing from the Licensed Provider, in an 'LP Completed' version of the Market Assurance Test Specification, the CMA will confirm in writing the outcome of the testing. If all tests have been successfully executed the CMA will create an 'Approved' version of the Market Assurance Test Specification, subject to approval by the CMA CEO and Market Assurance Testing will be classified as successfully completed.

The Market Assurance Test Specification will include success criteria for the tests and these will form the basis of the determination by the CMA as to whether Market Assurance Testing has been successful. This determination will be based on the causes and implication of the failure and will be without prejudice to the right of the CMA to require re-execution of Market Assurance Testing. Market Assurance Testing will not be determined to be completed if any test remains for which there has been no attempt to execute that test.

Following its determination that Market Assurance Testing has been successfully completed, the CMA shall establish appropriate user access to enable the LP to use their HVI for the registration of Supply Points.

If a Licensed Provider does not execute any transactions with the Central Systems, using its HVI, within 20 Business Days of the completion of Market Assurance Testing, the CMA will deem that the previously completed Market Assurance Testing is no longer sufficient and will require the Market Assurance Testing to be re-executed.

The CMA will provide without charge five days of Market Assurance Testing support (meetings, guidance, test environments) and will provide up to two days of pre-Market Assurance Testing support. A Licensed Provider may purchase additional support from the CMA if required, as an Additional Service.

## 4.2 Licensed Provider Obligations

A Licensed Provider that wishes to use a High Volume Interface will be required to successfully complete Market Assurance. A Licensed Provider that wishes to use a High

Volume Interface must notify the CMA of its intentions no less than two months prior to the Commencement Date for Market Assurance Testing.

A Licensed Provider must request a Market Assurance Commencement Date for Market Assurance Testing from the CMA. The request should include:

- A preferred Commencement Date, which must be no more than 10 Business Days after the scheduled date for completion of HVI development and testing,
- A scheduled date for completion of High Volume Interface development and testing (if not already complete)
- Confirmation that systems supporting the Licensed Provider's High Volume Interface are covered by Cyber Essentials Certification or ISO27001 Certification.
- A list of Transactions that will be undertaken using the HVI
- A list of all IP addresses that the LP may wish to use for the HVI (including any test environments and Market Continuity environments that the LP may utilise).

Before commencing Market Assurance Testing a Licensed Provider must confirm to the CMA, in writing, that they have completed all development and planned testing of their High Volume Interface application. A Licensed Provider must also confirm that they have in place a change management process that will allow the High Volume Interface to be maintained and changed as necessary. This notification may form part of the request for a Market Assurance Commencement Date or it may be provided separately following such a request.

Within 1 Business Day of the Market Assurance Commencement Date a Licensed Provider must complete a successful Data Transaction Capability Test to a Central Systems test system.

Within 2 Business Days of successfully completing the Data Transaction Capability Test a Licensed Provider must commence Market Scenario Testing.

A Licensed Provider must complete Market Assurance Testing and provide the results of the testing in the Market Assurance Test Specification, to the CMA within 10 Business Days of the Market Assurance Commencement Date.

## 4.3 Scottish Water Obligations

Scottish Water shall cooperate with the CMA in relation to any testing requirements for the Market Assurance of Licensed Providers. Scottish Water shall support such Market Assurance Tests as may be required by the CMA and carry out such Market Assurance Tests and other activities as the CMA reasonably requires.

## 4.4 Market Assurance Process

### **Step a. LP Notification**

An LP wishing to undertake Market Assurance Testing must submit an application, which must include a preferred Commencement Date for the testing and any IP addresses that the LP may wish to use for the HVI (including any test environments and Market Continuity environments that the LP may utilise).

### **Step b. LP Confirmation**

The LP must confirm that they have change management arrangements in place for their HVI and that the development and testing of their HVI is complete, within 10 Business Days of the preferred Commencement Date.

### **Step c. Market Assurance Test Specification**

Within 2 Business Days of the LP confirmation, the CMA will provide a Market Assurance Test Specification, which will include a confirmed Commencement Date, which must remain within 10 Business Days of the LP confirmation. The CMA will also enable test registrations to be executed by the LP via their HVI, as of the Commencement Date.

### **Step d. Market Assurance Testing.**

Market Assurance Testing should commence on the Commencement Date and should include;

- Data Transfer Capability Testing, which must be completed within 1 Business Day of the Commencement Date, The purpose of Data Transaction Capability Testing is to gain assurance that the Licensed Provider HVI can communicate with the Central Systems correctly. Data Transaction Capability Testing is a precursor for Market Assurance Testing and the CMA will use a Central Systems test system to carry this out. A successful test will consist of:
  - A Data Transaction Flow being submitted to and processed by the Central Systems test system, in accordance with the CS security procedures.
  - The reciprocal Data Transaction Notification Flow/s being retrieved by the Licensed Providers HVI application, in accordance with the CS security procedures.
- Market Scenario Testing, which must begin within 2 Business Days of the completion of DTCT. Market Scenario Testing will be carried out to obtain assurance that a Licensed Provider is able to carry out those Data Transaction Flows that it will submit to and retrieve from the Central Systems via the HVI. Successful Market Assurance Testing will consist of the successful submission and retrieval of all Data Transaction Flows and Data Transaction Notification Flows that the Licensed Provider will submit/retrieve via its HVI Application.

In the event that not all tests have been successfully executed it is at the discretion of the CMA whether to confirm the successful completion of Market Assurance Testing. For example, if a test to retrieve a Data Transaction Notification flow has not been completed, the CMA may still confirm the Market Assurance Testing as a success as these flows are also retrieved to and displayed on the Low Volume Interface

**Step e. Completion of Market Assurance Testing**

Market Assurance Testing must be completed and an 'LP Completed' Market Assurance Test Specification submitted to the CMA, within 10 Business Days of the Commencement Date. Within 3 Business Days, the CMA should have provided back to the Licensed Provider a 'Final' Market Assurance Test Specification. The CMA shall also establish appropriate user access to enable the Licensed Provider to use their HVI for the registration of Supply Points.

**Step f. Re-execution of Market Assurance Testing**

If a Licensed Provider has not executed any transactions, via its HVI, within 20 Business Days of the completion of Market Assurance Testing, Market Assurance Testing will be re-executed, in accordance with this CSD.

## 5 Market Re-assurance

This section sets out the Market Re-assurance process that must be completed by any Trading Party that has already undergone the Market Assurance process and is impacted by a change in circumstances that requires Market Re-assurance. The Market Re-assurance process defines a number of obligations for the CMA and for the Trading Party undertaking the Market Re-assurance process.

The purpose of Market Re-assurance is, in the event of a change of circumstances, to ensure that Trading Party systems can continue to operate daily market processes via the HVI in conjunction with the Central Systems. The Market Re-assurance process is designed to include the processing of daily transaction files impacted by a change in circumstances in order to confirm connectivity and operability between Trading Party Systems and the Central Systems.

What constitutes a change in circumstances is at the discretion of the CMA. However, the table below identifies those events that are likely to trigger Market Re-assurance.

Trigger Event	Comments
User wishing to use the HVI for additional Transactions	It is assumed that the user will be familiar with the HVI and limited reassurance will be required.
Trading Party hardware platform change	It is assumed that the user will be familiar with the HVI and limited reassurance will be required.
Central Systems hardware platform change	This is limited to Central Systems hardware directly handling data flows i.e. application and database server
Trading Party, or Central Systems communications change	It is assumed that this type of change includes; changes to network, change to ISP etc.
Trading Party software platform change	This is limited to software directly handling data flows; building outgoing flows and/or interpreting incoming flows. This may occur as a result of a Market Code Change Proposal which requires changes to the Central Systems Software
Trading Party software package upgrade	This is limited to software directly handling data flows, building outgoing flows and/or interpreting incoming flows.
Central Systems HVI security change	It is assumed that a change in HVI security arrangements will be delivered by a formal project and will be of a non-incremental nature.
Trading Party staff changes	Only applicable if there are changes to operational staff which require training and induction over and above that normally undertaken.
Trading Party business process change	Applicable if the Trading Parties changes any processes which are relevant to ensuring ongoing compliance with the MC
Dispute resolution	Market Code clause 9.3.3
Trading Party who is persistently failing Performance Standards	Market Code clause 6.2.8



Trigger Event	Comments
Trading Party systems supporting interactions with the HVI loses Cyber Essentials Certification or ISO27001 Certification	Market Code clause 3.2.9 and 4.2.9

## 5.1 CMA Obligations

If a change in circumstances results from a CMA led activity and Market Re-assurance Testing is required, the CMA will inform Trading Parties of the change in circumstances and the requirement for undertaking the Market Re-assurance process no less than two months prior to the change in circumstances occurring. The CMA will carry out the Market Re-assurance Process for a Trading Party.

Within two Business Days of a Trading Party confirming that they have completed an activity e.g. development and all planned testing of their High Volume Interface, the CMA will provide a Market Re-assurance Test Specification. The Test Specification will contain details of the steps involved in Market Re-assurance Testing, including pre-requisite steps and the tests that require to be executed and a Market Re-assurance Commencement Date for the testing.

On the Market Re-assurance Commencement Date, which must be no more than 10 Business Days after the submission of the written notification from a Licensed Provider that they have completed development and all planned testing of their High Volume Interface, the CMA will establish suitable access to a Central Systems test system and will commence Market Re-assurance Testing.

Market Re-assurance Testing will include a Data Transfer Capability Test (to ensure that the Trading Party system can still communicate with the Central Systems via the HVI) and Market Scenario Tests which will cover all Data Transaction and Notification Flows for which the Licensed Provider intends to use the High Volume Interface and which have been impacted by the change in circumstances. The outcome of each test should be duly recorded by the Trading Party and, where appropriate, by the CMA. The Trading Party will be authorised by the CMA to carry out via their High Volume Interface only those Transactions which have been subject to Market Re-assurance Testing, along with those previously assured, but not affected by the change in circumstances.

Within three Business Days of receiving the results of the Market Re-assurance Testing from the Licensed Provider, the CMA will confirm in writing the outcome of the testing, identifying whether the Market Re-assurance Testing has been successfully completed based on success criteria that the CMA will have identified. The success criteria will be based on the causes and implication of the failure and will be without prejudice to the right of the CMA to require re-

execution of Market Re-assurance Testing. Market Re-assurance Testing will not be determined to be completed if any test remains for which there has been no attempt to execute that test.

Following its determination that Market Re-assurance Testing has been successfully completed, the CMA shall confirm that the Trading Party can use their HVI for the Data Transactions and Notification Flows successfully executed during Market Re-assurance Testing.

The CMA will provide without charge three days Market Re-assurance Testing support (meetings, guidance, test environments) and provide up to two days of pre Market Re-assurance Testing support. A Trading Party may purchase additional support from the CMA if required, as an Additional Service.

In addition, although not requiring any Market Re-assurance testing, the CMA will modify HVI access to accommodate any notified changes to the IP addresses that a Trading Party wishes to use for the HVI within one Business Day of any such notification.

## 5.2 Trading Party Obligations

A Trading Party that wishes to use a High Volume Interface following a change in circumstances is likely to be required to successfully complete Market Re-assurance Testing.

If a change in circumstances results from a planned Trading Party led activity, the Trading Party must inform the CMA of the change in circumstances no less than two months prior to the change in circumstances occurring. If a Change of Circumstances results from an unplanned event, the Trading Party must inform the CMA of the Change in Circumstances as soon as reasonably practical after it has occurred.

If a change in circumstances results in the CMA requiring a Trading Party to undertake Market Re-assurance, the Trading Party must request a Market Re-assurance Commencement Date for Market Re-assurance Testing, from the CMA. The request should include:

- A preferred Market Re-assurance Commencement Date, which must be no more than 10 Business Days after the scheduled date for completion of HVI development and testing
- A scheduled date for completion of High Volume Interface development and testing (if not already completed)
- Confirmation that systems supporting the Licensed Provider's High Volume Interface will be covered by Cyber Essentials Certification or ISO27001 Certification by the scheduled date for completion of High Volume Interface development and testing.

- A list of HVI Transactions that are impacted by the change in circumstances

Before commencing Market Re-assurance Testing, a Trading Party must confirm to the CMA, in writing, that they have completed all development and planned testing of their High Volume Interface application. A Trading Party must also re-confirm that they have in place a change management process that will allow the High Volume Interface to be maintained and changed as necessary and that Cyber Essentials Certification or ISO27001 Certification has been re-established for systems supporting the Trading Party's interactions via the High volume Interface. This notification may form part of the request for a Market Re-assurance Commencement Date, or it may be provided separately following such a request.

Within 1 Business Day of the Market Re-assurance Commencement Date, a Trading Party must complete a successful Data Transaction Capability Test to a Central Systems test system.

Within 2 Business Days of completing the Data Transaction Capability Test, a Trading Party must commence Market Scenario Testing.

A Trading Party must complete Market Re-assurance Testing and provide the results of the testing, to the CMA within 10 Business Days of commencing Market Re-assurance Testing.

In addition, although not requiring any Market Re-assurance, Trading Parties must provide any changes to the IP addresses that they wish to use for the HVI (including any test environments and Market Continuity environments) no less than 2 Business Days prior to any such change being made.

## 5.3 Market Re-assurance Process

### **Step a. Identification of a Requirement for Market Re-assurance Testing**

If a Trading Party identifies that a change in circumstances is anticipated that may result in the need for Market Re-assurance Testing, they shall notify the CMA no less than 2 months prior to the change in circumstances occurring and will submit a preferred Market Re-assurance Commencement Date, except where the change in circumstances only involves the loss of Cyber Essentials Certification or ISO27001 Certification, in which case, they shall notify the CMA within 2 Business Days of such.

Following receipt of such a notification from a Trading Party, except where such notification only involves the loss of Cyber Essentials Certification or ISO27001 Certification, the CMA will confirm, no less than 2 months prior to the change in circumstances occurring, whether Market Re-assurance Testing is required. If the CMA identifies a change in circumstances that will

require Market Re-assurance Testing, relevant Trading Parties will be notified by the CMA not less than 2 months prior to the underlying change in circumstances occurring.

If such a notification from a Trading Party relates only to the loss of Cyber Essentials Certification or ISO27001 Certification, the CMA will confirm within 2 Business Days, that Market Re-assurance is required.

#### **Step b. Trading Party Confirmation**

Following receipt of a confirmation from the CMA that Market Re-assurance is required, the Trading Party will notify the CMA that they continue to have change management arrangements in place for their HVI, that the development and testing of their HVI is complete and that Cyber Essentials Certification or ISO27001 Certification is now in place, within 10 Business Days of the preferred Market Re-assurance Commencement Date.

#### **Step c. Market Assurance Test Specification**

Except where the change in circumstances only involves the loss of Cyber Essentials Certification or ISO27001 Certification, within 2 Business Days of the Trading Party confirmation, the CMA will provide a Market Assurance Test Specification, which will include a confirmed Commencement Date, which must remain within 10 Business Days of the Trading Party confirmation. The CMA will also enable test registrations to be executed by the Trading Party via their HVI, as of the Market Re-assurance Commencement Date.

#### **Step d. Market Re-assurance Testing.**

Except where the change in circumstances only involves the loss of Cyber Essentials Certification or ISO27001 Certification, Market Re-assurance Testing should commence on the Market Re-assurance Commencement Date and should include;

- Data Transfer Capability Testing, which must be completed within 1 bd of the Market Re-assurance Commencement Date, The purpose of Data Transaction Capability Testing is to gain re-assurance that the Trading Party HVI can continue to communicate with the Central Systems correctly, following the change in circumstances. Data Transaction Capability Testing is a precursor for Market Scenario Testing and the CMA will use a Central Systems test system to carry this out. A successful test will consist of:
  - A Data Transaction Flow being submitted to and processed by the Central Systems test system, in accordance with the CS security procedures.
  - The reciprocal Data Transaction Notification Flow/s being retrieved by the Trading Party's HVI, in accordance with the CS security procedures.
- Market Scenario Testing, which must begin within 2 Business Days of the completion of DTCT. Market Scenario Testing will be carried out to obtain re-assurance that a Licensed Provider is able to carry out those Data Transaction Flows that are potentially

impacted by the change in circumstances, via the HVI. Successful Market Re-assurance Testing will consist of the successful submission and retrieval of all Data Transaction Flows and Data Transaction Notification Flows that are potentially impacted by the change in circumstances, via its HVI Application.

In the event that not all tests have been successfully executed it is at the discretion of the CMA whether to confirm the successful completion of Market Re-assurance Testing. For example, if a test to retrieve a Data Transaction Notification flow has not been completed, the CMA may still confirm the Market Re-assurance Testing as a success as these flows are also retrieved to and displayed on the Low Volume Interface

#### **Step e. Completion of Market Re-assurance Testing**

Except where the change in circumstances only involves the loss of Cyber Essentials Certification or ISO27001 Certification, Market Re-assurance Testing must be completed within 10 Business Days of the Market Re-assurance Commencement Date. Within 3 Business Days, the CMA should have provided confirmation to the Trading Party of the success or failure of Market Re-assurance Testing.

- Data Transaction Capability Testing (DTCT) Production – This will involve a capability test with the CMA Central Systems Production environment, just prior to a Trading Party being confirmed as a High Volume Interface user. A successful test will consist of:
  - A Data Transaction Flow from the Trading Parties High Volume Interface application being submitted to and processed by the Central Systems, in accordance with the CS security arrangements and without; system errors, data corruption, or undue impact on the Central Systems or on the Trading Party systems
  - The reciprocal Data Transaction Notification Flow/s being retrieved by the Trading Parties High Volume Interface application (the T009 with the appropriate error code), in accordance with the CS security arrangements and without; system errors, data corruption, or undue impact on the CS or on the Trading Parties systems

Where the change in circumstances only involves the loss of Cyber Essentials Certification or ISO27001 Certification, Market Re-assurance Testing will be deemed to have been completed on receipt of a Trading Party Confirmation, as set out in step b,



# Annex A CMA Market Training/Assurance Application

Company name:			
Name:			
Title/Position:			
Address:			
Tel:		Fax:	
Email:			
Date:			

I confirm that it is our intention to operate in the Water Market in Scotland in the following Licensed Provider Role(s)

Please indicate the communications method(s) by ✓ the boxes below		Please indicate types of provision by ✓ the boxes below	
	Low Volume Interface (Training Process applies)		Water Supply
	High Volume Interface (Assurance Process applies)		Sewerage Supply
			Trade Effluent
			Self Supply

Please provide as much of the following as you are able:

Target date for registration of first supply point.	
How critical is this date to your business?	
Preferred dates for CMA training on Low Volume Interface	
<b>If operating High Volume Interface:</b> Date expected to be ready to start CMA Assurance.	
Confirmation of Cyber Essentials Certification or ISO27001 Certification (obligatory)	

Signed: ..... Position: ..... Date:

Please e-mail this application to: [enquiries@cmascotland.co.uk](mailto:enquiries@cmascotland.co.uk), or sign and Fax to: 01786 468 868 or post to: The Central Market Agency, Enterprise House, Springkerse Business Park, Stirling, FK7 7UF  
Tel: 01786 468 860. The CMA will respond within three working days.

## Annex B Self-Certification Form

On behalf of ..... (“the Licensed Provider”), I declare that the Licensed Provider:

- Understands its obligations under the Market Code, Code Subsidiary Documents and the market framework generally;
- Confirms that it is compliant with the Data Protection obligations, as set out in Schedule 25 of the Market Code.
- Confirms that it has established Cyber Essentials Certification or ISO27001 Certification for systems supporting interactions with the LVI,
- Acknowledges that the Licensed Provider is bound by the Performance Standards and is liable for Performance Standard Charges in accordance with the Market Code;
- Has undertaken training provided by the Central Market Agency on the operation of the Low Volume Interface; and
- Can operate the Low Volume Interface for the Central Systems;
- Acknowledges that the Commission, the Central Market Agency and any of their agents will not be held responsible for any difficulty that the Licensed Provider may encounter using the Low Volume Interface.

This declaration relates to water services/sewerage services/both water and sewerage services [delete as appropriate].

Signed on behalf of the Licensed Provider by:

..... (sign name)

..... (print name)

Position: .....

at: ..... (Time)

on: ..... (Date)

before this witness:

Signature: .....

Name: .....

Address: .....

.....

.....