**OPERATIONAL CODE CHANGE PROPOSAL**

<table>
<thead>
<tr>
<th>Operational Code Change Proposal Ref (Assigned by CMA)</th>
<th>OCCC033</th>
<th>Version Number (Assigned by CMA)</th>
<th>Version 1.0</th>
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</table>

**Title of the change**  
Creating paired SPIDS in the Market

1. **GENERAL DETAILS**

   Proposers are reminded that Change Proposals must be countersigned by the Proposer’s Contract Manager or the person designated by the signatory to the Market Code Framework /Accession Agreement

<table>
<thead>
<tr>
<th>Company:</th>
<th>Business Stream</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature:</td>
<td>James Bream</td>
</tr>
</tbody>
</table>

Date: 29/3/11  
Name: James Bream

Contact details for the Proposal - the contact should be able to deal with queries regarding this Operational Code Change Proposal and need not be the same person who has countersigned the Change Proposal

| Name: | James Bream |
| Email Address: | James.bream@business-stream.co.uk |
| Telephone and or Mobile: | 0131 338 3223 |

Number of Associated Documents: 00  
Name or link to documents:  
110330 Form A amendments tracked.doc  
110330 Form B amendments tracked.doc

If the OCCC will also affect the Operational Code, an MCCP must also be raised

Indicate if there is an associated MCCP  
MCCP Ref: CMA use only

**URGENT – IF PROPOSER HAS INDICATED THIS OCCC IS URGENT, STATE REASONS HERE**

The CMA Chief Executive will review this information and make a decision as to whether to take this OCCC forward as urgent as defined as under Market Code Part 8.8.1 (ii) (e)

This change is not urgent. However, it is important that the underlying problem that is being addressed is resolved as soon as possible.

2. **OPERATIONAL CODE CHANGE PROPOSAL DETAILS**

A **ISSUE or DEFECT WHICH THIS OPERATIONAL CODE CHANGE PROPOSAL SEEKS TO ADDRESS required under Market Code Part 8.8.1 (ii) (b)**
Currently the market is experiencing challenges in ‘pairing SPIDs’ following New Connections. Unpaired SPIDs can arise for a variety of reasons. However, in most cases a pair of SPIDs is the most likely requirement and as such we believe that the creation of a SPID pair should be a default position rather than the exception.

Our recommendation is that existing new connection (Water and Sewerage) forms are revised to adopt a default SPID pair creation requirement on Scottish Water. Only when Licensed Providers specifically request a single SPID should this be created in the market.

In the event that a Licensed Provider does not require the default position, but does not request a variance they can use the deregistration process to remove the SPID. However, we believe that this is unlikely as there is a greater incentive on Licensed Providers to get the data right the first time round. If a Licensed Provider requests a SPID pair inadvertently they will of course begin accruing a wholesale charge, hence the incentive to get initial application correct.

**B**  
**DESCRIPTION OF NATURE AND PURPOSE OF THE CHANGE AND HOW IT MEETS THE OPERATIONAL CODE OBJECTIVES AND PRINCIPLES FOR THE MARKET DOCUMENTS** required under Market Code Part 8.8.1 (ii) (c)

The Proposer should indicate which principles the change supports and whether there is any adverse effect on any principle(s).

- a) Proportionality
- b) Transparency
- c) Simplicity, cost-effectiveness and security
- d) Non-exclusivity
- e) Barriers to entry
- f) Customer contact
- g) Non-discrimination
- h) Not detrimental to Scottish Water’s core functions

We believe this approach is simple, reduces risk and also addresses the issue without creating complicated system changes or workarounds. The change is proportional, it addresses a known problem with a low cost solution. We believe it will be cost beneficial by reducing future data fixes and also revisions to customer and wholesale bills as new SPID pairs are created to address data issues.

We consider this change proposal puts incentives on all parties to address an issue without creating an undue burden on one part of the market. Finally this will make the connections process more simple and transparent for existing and new entrants.

**C**  
**IMPACT** – required under Market Code Part 8.8.1 (ii) (f)

The Proposer should indicate the sections of the Market Code affected, whether the Operational Code or CSDs, Wholesale Services Agreement or License is impacted and whether there are likely to be implications on:

- a) Central Systems
- b) Trading Party’s systems
- c) CMA Interfaces/ Processes
- d) Trading Party’s business processes

- a) Central Systems – No change
- b) Trading Party’s systems – Unknown, we do not believe this will create a requirement for system changes
- c) CMA Interfaces/ Processes – No change
- d) Trading Party’s business processes – This will require some minor revisions to Licensed Providers and Scottish Water’s processes arising from Operational Code (form) changes.

**D**  
**DRAFT LEGAL TEXT** – required under Market Code Part 8.8.1 (ii) (d)
3. IMPLEMENTATION DETAILS - PROPOSED IMPLEMENTATION DATE OR LEAD TIME

<table>
<thead>
<tr>
<th>Timescale must not overlap with the period of consultation with the Commission and should take account of the impacts identified in Section C. Any quoted lead time should commence from date of approval.</th>
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<tr>
<td>The Implementation Date will be the date of the next release of the Operational Code following Approval by the Commission</td>
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4. ANY OTHER COMMENTS

The full text of the objectives and principles for the Operational Code are set out in The Water Services (Codes and Services) Directions 2007 which can be downloaded from the Commission's website (http://www.watercommissioner.co.uk/Comp/Servicedirections.asp)