**PART A — SUBMISSION**

**A.1. GENERAL DETAILS**

**A.1.a. TITLE**

Complaints KPIs

**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: Belinda Oldfield

**A.1.d. CONTACT NAME**

Richard Lavery

CONTACT EMAIL; TEL./MOB.

richard.lavery@scottishwater.co.uk

07875 873845

**A.1.e. ASSOCIATED MCCP / OCCP**

N/A

**A.1.f. ASSOCIATED DOCS.**

N/A

**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 17 of the Operational Code sets out the timescales within which Scottish Water should respond to complaints from Licensed Providers on behalf of their customers.

Process F5 of the Wholesale Retail Code, Operational Terms in the English market sets out the equivalent process for English Wholesalers to respond to complaints from Retailers on behalf of their customers.

For the vast majority of directly comparable process steps in the Scottish Operational Code and English Operational Terms, the KPIs are equal, reflecting the fact that the Scottish codes were used as the starting point for the design of the English market. This also enables like-for-like comparison of
wholesaler performance between the two markets.

One notable exception is the complaints processes where the KPIs are shorter in England. The result of this discrepancy is that complaints could be responded to more slowly in Scotland and also that for this process it is not possible to compare wholesaler performance on a like-for-like basis between England and Scotland.

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

The proposed change is to align process 17 of the Operational Code with process F5 of the Operational Terms in England. The purpose of the change is to align the timescale for responses to complaints between Scotland and England to mitigate any risk of worse customer outcomes in Scotland and to improve the ability to consistently compare wholesaler performance across the two markets.

The result of the change is to reduce the timescale for substantive response from Scottish Water from the current 15 business days to 8 business days. In addition, timescales are also defined for the Licensed Provider to submit the complaint to Scottish Water within 1 business day of receipt from the customer. This has the result of enabling the customer to receive a response within 10 business days of contacting their Licensed Provider.

Principles and Objectives affected

<table>
<thead>
<tr>
<th>PRINCIPLE</th>
<th>AFFECTED (Y/N)</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proportionality</td>
<td>Y</td>
<td>Timing only change to align Scottish and English codes, improving customer experience and enabling like-for-like comparison of wholesaler performance</td>
</tr>
<tr>
<td>Transparency</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Simplicity, Cost-effectiveness, and Security</td>
<td>Y</td>
<td>Timing only change to align Scottish and English codes, improving customer experience and enabling like-for-like comparison of wholesaler performance</td>
</tr>
<tr>
<td>Non-exclusivity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Barriers to Entry</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Customer Contact</td>
<td>Y</td>
<td>Timing only change to align Scottish and English codes, improving customer experience and enabling like-for-like comparison of wholesaler performance</td>
</tr>
<tr>
<td>Non-discrimination</td>
<td></td>
<td></td>
</tr>
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</table>
Non-detrimental to SW Core Functions

MC / OC OBJECTIVES

<table>
<thead>
<tr>
<th>CONFIGURED ITEM</th>
<th>IMPACTED (Y/N)</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>MC / OC</td>
<td>Y</td>
<td>Operational Code changes included below</td>
</tr>
<tr>
<td>CSDs</td>
<td>N</td>
<td></td>
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<tr>
<td>Wholesale Services Agreements</td>
<td>N</td>
<td></td>
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<tr>
<td>Licenses</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>CMA Central Systems</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>CMA business processes</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>Trading Party systems</td>
<td>Y</td>
<td>Changes to KPI reporting for Scottish Water. Possible changes to LP monitoring systems if automated</td>
</tr>
<tr>
<td>Trading party business processes</td>
<td>Y</td>
<td>Change to timing of process only</td>
</tr>
</tbody>
</table>

A.2.d. DRAFT LEGAL TEXT

Enquiries, Complaints and Contacts
Process 17 - Complaints relating to Scottish Water’s services
Purpose and scope of Process 17: -
This Process sets out the operational requirements to be followed by Scottish Water in the event of it receiving a complaint from either the Licensed Provider or the Non-Household Customer. Scottish Water shall act expeditiously in dealing with a complaint.

Process:-

Step 1
When Scottish Water receives a complaint in relation to the provision of Water or Sewerage Services from a Non-Household Customer, it will immediately re-direct the Non-Household Customer to the relevant Licensed Provider. When a Non-Household Customer complains to a Licensed Provider in relation to Scottish Water's provision of Water and Sewerage Services, the Licensed Provider will log the complaint and assign a reference number.

Step 2
Thereafter when a Licensed Provider complains to Scottish Water in relation to Scottish Water's...
provision of Water or Sewerage Services, within 1 Business Day of receiving the complaint from the Non-Household Customer it will submit a complaint form (Form G) as set out in the Appendix to this Code which will provide the following information:

- Licensed Provider ID;
- Non-Household Customer’s Supply Point ID where relevant;
- complaint reference number or numbers where more than one Non-Household Customer has complained concerning the same or a related incident;
- details of the complaint; and
- whether compensation is being claimed.

Step 3
Scottish Water will investigate a complaint and report to the Licensed Provider within 5 Business Days from receipt of the complaint. The report will provide the following information:

- Licensed Provider ID;
- Non-Household Customer’s Supply Point ID where relevant;
- complaint reference number or numbers where more than one Non-Household Customer has complained concerning the same or a related incident; and
- any resolution available to the Non-Household Customer complaint.

Save as set out below, within 158 Business Days of receipt of the complaint Scottish Water will have issued a response which is:

(i) clear as to the action (if any) to be taken and the timescale for such action; and
(ii) reflects the service provision for which Scottish Water is currently financed.

If Scottish Water is not able to issue such a response within 158 Business Days of receipt of the complaint due to reasons beyond its reasonable control (for example, in relation to vexatious or frivolous complaints) it shall, at all times, act expeditiously in dealing with the complaint. In such cases Scottish Water shall also confirm within 158 Business Days of receipt of the complaint the reasons why the complaint cannot be responded to within the 158 Business Days period.

Step 4
Where compensation is due to the Non-Household Customer, Scottish Water will pay any such compensation to the Licensed Provider, who will pass this payment on to the Non-Household Customer.

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.

To be implemented from the start of a reporting year. Subject to approval by Technical Panel, feasibility of implementing for 1 April 2019 to be confirmed with affected Trading Parties, otherwise 1 April 2020.

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

A.4. ANY OTHER COMMENTS
### PART B — TP ASSESSMENT

#### B.1. ASSESSMENT PROCESS

<table>
<thead>
<tr>
<th>ASSESSMENT START DATE</th>
<th>ASSESSMENT END DATE</th>
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<tbody>
<tr>
<td>2019-02-06</td>
<td>2019-02-21</td>
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</tbody>
</table>

#### B.1.a. ASSESSMENT START DATE

- 2019-02-06

#### 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 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)

<table>
<thead>
<tr>
<th>Impact on Principles and Objectives (if different from that originally submitted)</th>
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<tbody>
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<table>
<thead>
<tr>
<th>Cost Estimate</th>
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<table>
<thead>
<tr>
<th>Benefit Estimate (L: &lt; 10k, M: £10k to £100k, H: &gt; £100k)</th>
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#### B.3. TP DECISION

- TP APPROVED

#### B.4. FINAL TP VIEWS

- Unanimously approved on 21st February 2019

#### B.5. PLANNED IMPLEMENTATION DATE

- 2019-04-01
**WITHDRAWN BY PROPOSER?**

No

**COMMENTS**


**DATE OF WITHDRAWAL**


### PART C — COMMISSION APPROVAL

| C.1. DATE FINAL REPORT ISSUED TO COMMISSION | 2019-02-28 |
| 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 | Proposed April 2019 |
| D.2. IMPLEMENTATION DETAILS (MC version, CSD versions, CMA Central Systems release number, etc.) | |