



WHOLESALE DATA CHANGES POLICY

1. Introduction

The purpose of this policy is to clarify Scottish Water's approach to correcting historic data in the Central Systems. This policy sets out the principles to be followed in making data corrections and Annex 1 defines the approach to various specific scenarios.

2. Scope

The policy applies to all data changes at the Central Market Agency's (CMA's) Central Systems which have the potential to affect wholesale charges. Whilst the policy is concerned with the effective date to be used when changing data in the Central Systems, it is assumed that it may also be applied to data in market participant's own systems, to the extent that they are required to align with CMA data.

Allowances are not within the scope of this data correction policy. A recurring allowance is granted by Scottish Water (for example a reduced Return-to-Sewer allowance, Fire Tariff Agreement, Trade Effluent allowance) on receipt of a valid application relevant to the particular circumstances, in accordance with the relevant allowance policy.

3. Wholesale Data Changes and Settlement

Wholesale charges are calculated by the CMA based on data (relating to premises, services, meters and meter readings) held in the Central Systems and maintained by Scottish Water and Licensed Providers. The Market Code and Code Subsidiary Document CSD0201 set out the settlement timetable followed by the CMA, culminating in a Final Reconciliation (RF) run for each Tariff Year (1 April – 31 March). In some instances, it is necessary to revisit wholesale charges at specific Supply points after the RF settlement run has been invoiced.

The Central Systems will allow data to be changed as far back as market opening on 1 April 2008. This policy document defines how far changes to Scottish Water data in the Central Systems will be backdated in order to correct the historic record of services, depending on the circumstances. **Changing data does not, in itself, result in a change to wholesale charges.**

After the normal settlement timetable has concluded and the RF run has been invoiced, a revised invoice or credit note is only issued by Scottish Water if data is changed in the Central Systems and charges are recalculated by the CMA for a given period and Supply Point where agreed between and requested by Scottish Water and the relevant Licensed Provider(s). **Scottish Water's separate *Wholesale Charges Backdating Policy* defines how far back the CMA will be requested to recalculate charges where data has changed. Where charges are recalculated, this will result in a revised invoice or credit note being issued for a given period and Supply Point.**

4. Principles for backdating data changes

Data will be changed to reflect the services to which a Supply Point has been connected over time, subject to the limits on backdating set out in sections 4.1 and 4.2 below.

4.1 Data change potentially resulting in an increase in wholesale charges

4.1.1 Scottish Water triggered changes

Where a data change could result in an increase in wholesale charges and has arisen from



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changes to the service that Scottish Water provides, changes to Scottish Water's asset data or identification of an inaccurate record of Scottish Water's service and asset data at the CMA, the change shall be effective from the date of notification to the Licensed Provider i.e. not backdated.

If Scottish Water has previously wrongly advised the Licensed Provider that a service is not provided to a Supply Point and subsequently identifies that the service is in fact provided (for example Property Drainage), advance notice will be provided before the data is corrected to reinstate charges. The data will be changed with effect from the start of the next Tariff Year, providing at least 3 months advance notice.

4.1.2 Customer triggered changes

Where a data change could result in an increase in wholesale charges and has arisen as the result of the actions of the customer, the data should be changed with effect from the most recent of the date on which the customer action occurred and 1 April of the previous tariff year (the period for which a Final Reconciliation run has not yet taken place so settlement has not concluded). For example, if the data correction was made during the 2023-24 tariff year, it would be backdated no further than 1 April 2022.

In exceptional circumstances where the customer is shown to have taken deliberate actions to avoid the correct processes and application of increased charges (such as an illegal connection to Scottish Water's network) data changes may be backdated further than the 1 April of the previous tariff year.

As set out in Section 2 above, a backdated change in data will not necessarily result in a change in wholesale charges over the same period.

4.2 Data change resulting in a reduction in wholesale charges

Where a data change could result in a reduction in wholesale charges, the data change can be backdated in the Central Systems no further than market opening (1 April 2008).

As set out in Section 2 above, a backdated change in data will not necessarily result in a change in wholesale charges over the same period.



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Annex 1: Detailed scenarios encountered requiring data correction

i. Scenarios

The principles for backdating data changes are defined in section 4 of the covering policy. This annex sets out additional considerations for the specific scenarios listed below.

ii. Property Drainage

Where there is known to have been a physical change to the drainage configuration of a premises affecting the applicability of Property Drainage charges, the date of this change of configuration would be the effective date of the change of market data. If there is no specific evidence of a change in the drainage configuration at the premises, the current drainage arrangements will be assumed to have existed since its construction.

iii. Roads Drainage

Since 1 April 2021, there has not been a separate charge for Roads Drainage and it has no longer been recorded as a service in the Central Systems. As set out in the Wholesale Charges Scheme prior to 2021/22, the applicability of Roads Drainage charges was based on the presence of any other sewerage services at a Supply Point.

If the removal or addition of Roads Drainage at a Supply Point was triggered by the removal of all or addition of any other sewerage services (i.e. Foul Sewerage, Property Drainage or Trade Effluent), the same effective date as is used for the other sewerage services should also be applied to the addition or removal of Roads Drainage.

iv. Rateable Value

Appendix 3 of the Wholesale Charges Scheme sets out the Rateable Value which should be recorded at the CMA for a Supply Point and how any changes should be applied.

v. Vacancy and Occupancy

Where the occupancy status of a premises changes, the actual date that the property became occupied or vacant (as defined in section 9 of CSD0104) shall be the effective date applied at the CMA, subject to the principles in Section 4.

vi. Gap Sites

Where an eligible premises is identified to be receiving services but is not recorded at the CMA, a new Supply Point is registered using the Gap Site process. As set out in the Market Code, the effective date applied is the date of notification to the CMA.

vii. De-registration

Supply Points can be de-registered from the CMA for a variety of reasons and the effective date of the de-registration will depend on the circumstances as set out below.

a. Duplicate Supply Points



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Where a premises is found to be represented by duplicate Supply Points at the CMA, one of the Supply Points shall be de-registered, effective from the connection date of the retained Supply Point.

b. Domestic and Merged Properties

Where a Supply Point is to be de-registered because the associated premises is found to be domestic or has been merged with another property, the de-registration would be effective from the date at which the change of use or alteration is recorded as being effective by the Scottish Assessors.

c. No Services

Where it is identified that a Supply Point should be de-registered because services have never been provided, to the premises, the Supply Point will be de-registered effective from the connection date of the Supply Point.

Where the Supply Point is to be de-registered because no services are provided following a physical change at the premises, the effective date would be the date of the change.

d. Landlord/tenant scenarios

Where Supply Points need to be de-registered or services removed in order to correctly reflect the configuration of multi-tenancy premises served by a bulk meter associated with the landlord, the effective date should be the later of any related change in configuration of the site and the date of connection of the Supply Point.

viii. Prompt correction of erroneously de-registered Supply Points

In the event that a Supply Point is erroneously de-registered and at the time of deregistration it is realised that the user has made an error and the Supply Point needs to be reinstated, the connection date of the new Supply Points shall be the same as the effective date of the previous de-registration. This applies to cases where the mistake is realised at the time of processing and can be promptly rectified. This does not apply to errors discovered some time after the event in which case normal processing rules apply.

ix. Allowances

Where an ongoing allowance is granted by Scottish Water (including but not limited to a reduced Return-to-sewer allowance, Fire Tariff Agreement, Trade Effluent allowances), the effective date of the allowance shall be as set out in the relevant allowance policy.

x. Exemption Scheme

Where a Supply Point is demonstrated to be eligible for the Scottish Government Exemption Scheme, exemption is granted with effect from the start of the Tariff Year for which a valid application with all necessary supporting information is received by Scottish Water. A valid application must be submitted by the end of the Tariff Year to which the application relates.

xi. Trade Effluent

Each year Scottish Water updates the fixed strengths applicable for each Trade Effluent consent based on samples taken at the Discharge Point during the previous year. Licensed Providers are



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given visibility of the proposed strengths in advance of the start of the new Tariff Year and have the opportunity to raise any queries or objections within 8 weeks of receipt. Any upheld challenges which are received within this period will be applied effective from the start of the Tariff Year. Any upheld challenges received after the expiry of the 8 week review period will be applied effective from the date of receipt of the challenge from the Licensed Provider.

Any changes to consent parameters will be applied from the effective date of the revised consent.

xii. Meters

This section applies to the effective dates that should be applied where a meter is found to not be correctly recorded at the CMA. Where consumption is to be estimated, this is calculated in accordance with Scottish Water's Estimated Metered Consumption Policy.

a. Found meters at unmeasured Supply Points

Where a meter is found to be serving a premises which is recorded as unmeasured at the CMA, the meter will be added to the Supply Point effective from the date on which the meter was found with an opening reading taken on that date.

If the Licensed Provider wishes to replace the historic unmeasured charges with metered charges where the meter read history indicates that these would have been lower, they can apply to Scottish Water for the metered charges to be backdated. At least one cyclic reading, taken no less than one month after the opening reading, must be supplied to support such an application.

The initial reading at installation will be assumed to have been zero. Where the customer, Licensed Provider or Scottish Water has information to suggest when the meter was likely to have been installed, this will be used as the estimated installation date provided that it is consistent with the meter year of manufacture, consumption profile and any other available details. In the absence of any such information, the meter will be assumed to have been installed on 1 April following the end of the year of manufacture of the meter.

Metered services will be created at the CMA from the estimated installation date. The reading recorded on date of finding of the meter and the cyclic reading supplied by the Licensed Provider will be compared to establish whether the register of the meter is likely to have rolled over since installation.

b. Previous meter exchange not recorded on systems

The meter could have been previously exchanged by Scottish Water or another party and the associated data updates have not been processed at the time.

In this case the exchange would be processed at the CMA as having occurred on the date that the new meter was found on site. The opening reading on the new meter would be the reading recorded on site on that date. The closing read on the old meter would be estimated based on the last two readings taken on that meter, consistent with section 3.2 of Scottish Water's Estimated Metered Consumption Policy.

c. Meter attached to wrong SPID



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If the found meter is already recorded at the CMA but attached to a different Supply Point, the existing incorrect meter would be exchanged for the correct meter at the CMA on the date of finding. The opening reading on the new meter and the closing reading on the old meter would be the readings observed on site on that date.

If the correct meter now associated with a Supply Point has lower historical consumption than the meter previously associated, the Licensed Provider can apply for the difference in consumption to be backdated to the actual physical installation date of the correct meter at the CMA, by applying an allowance or by amending the exchange date and reads.

d. Meter wrongly installed on shared supply

If a meter is found to be recording a shared supply serving multiple Supply Points or including separate household premises, arrangements will be made to enable each Supply Point or household premises to be charged separately if the Licensed Provider notifies Scottish Water that there is not a single non-household party wishing to take responsibility for the charges associated with the metered shared supply (e.g. the landlord in a multi-occupancy premises). Separating charges would enable any Supply Point to be billed directly by a Licensed Provider and any household premises to be billed by their Local Authority. Depending on the circumstances, these arrangements could include the installation of sub-meters in a network; the removal of the existing meter and installation of individual meters for each Supply Point and/or reverting some or all Supply Points to unmeasured charges.

These changes would be backdated to the date of installation of the meter on the shared supply.

e. Meter removed (at unknown date)

If a meter is found to have been removed from a Supply Point and not replaced, a new meter will be installed. The meters will be exchanged at the CMA on the date of installation of the new meter. The closing reading on the old meter will be estimated based on the historical read profile, consistent with section 3.2 of Scottish Water's Estimated Metered Consumption Policy.

xiii. Schedule 3 Agreements and Raw Water customers

The D2003 Schedule 3 percentage discount is used in the Central Systems to apply the correct level of wholesale charges to Supply Points which are subject to a Schedule 3 Agreement or which are served by a non-potable water supply.

In both scenarios, the correct level of % discount relative to standard wholesale charges depends on the annual consumption at the Supply Point. The % discount is therefore set at the start of the Financial Year based on expected consumption at the Supply Point and is subsequently amended as required (either up or down) after all meter reads have been submitted to the Central Systems and actual consumption is known.

The Schedule 3 % discount for a given Tariff Year will be amended to the correct level before the RF settlement run for that year provided that meter readings have been submitted to the Central Systems confirming consumption up to the end of that Tariff Year at least one month prior to the RF settlement run date.



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Otherwise, the Schedule 3 % discount for a given Tariff Year will be amended to the correct level by Scottish Water after the Licensed Provider has submitted meter readings confirming consumption up to the end of the Tariff Year into the Central Systems.

Annex 2: Version History

Version	Date	Comments
1.0	05/03/15	First approved version
1.1	13/12/23	<ul style="list-style-type: none"> - Amendment principles section to align with new separate Wholesale Charges Backdating Policy - Removal of references to the WICS Data Alignment Project - Update to reflect removal of Roads Drainage as a separate charge item from 2021/22 - Removal of Rateable Value section, referencing Appendix 3 of Wholesale Charges Scheme - Removal of provisions relating to exempt SPIDs wrongly recorded as vacant – no longer relevant since introduction of Charging at Vacants in 2017. - Removal of unnecessary detail on allowances where already specified in relevant allowance policies - Simplification of shared supply provisions - General simplification of language throughout - Shortening of Annex to remove repetition with main policy document - Addition of Annex 2 version history - Addition of section on setting of Schedule 3 discounts



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