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Tom Sharples
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22 January 2016

Dear Tom

Technical Panel Consultations:

MCCP190 – Performance Standard Amendments

MCCP191 – Vacancy Definition

MCCP193 - Change to the Gap Site Letter Process

Many thanks for sending on notification of the latest change proposals to the Market and Operational Code.

CAS does not have an organisational view on Performance Standard Amendments.

We note the points raised by Scottish Water in the Change to the Gap Site Letter Process consultation. However, we are concerned that the motivation for the change request is to reduce overheads and that no assurance has been provided that proposed changes will not adversely impact customers. CAS has raised formal issue with one licensed provider regarding poor engagement practices with gap site customers, and we are working with the supplier to improve their practices. We therefore seek assurance from WICS that the proposed changes to the gap site letter process will not place customers at risk of a poorer standard of engagement from their licensed provider.

The above issue reinforces our view that the Technical Panel consultations must include an assessment of the impact on consumers to ensure it remains focused on the end user. We would welcome an opportunity to meet with you to discuss ways in which the Market Code / Operational Code Change Proposal forms can be updated to include this information. If it is helpful, we would be able to suggest specific wording to reflect this change.

We welcome the proposed change as set out within the Vacancy Definition proposal and agree that it makes sense to take out a binding condition that would deliver greater consumer benefit if removed.

Yours sincerely

Gail Walker
Policy Manager (Water)