

## Wholesale Retail Code Change Proposal – Ref CPW139f

<b>Modification proposal</b>	Wholesale Retail Code Change Proposal – Ref CPW139f – Bilateral Hub (Phase 12)
<b>Decision</b>	The Authority has decided to approve this Change Proposal
<b>Publication date</b>	3 May 2024
<b>Implementation date</b>	26 June 2024

### We are approving this Change Proposal.

CPW139f seeks to implement 19 existing operational processes into the Bilateral Hub, either through incorporating them into existing Bilateral Hub processes or through creating new Bilateral Hub processes to accommodate them. This contributes towards the migration of all operational processes into the Bilateral Hub, or their retirement, as part of the Bilateral Transactions programme, which is aimed at improving the efficiency of transactions between Retailers and Wholesalers for the benefit of customers. CPW139f also seeks to implement the first round of additional enhancements to the Bilateral Hub, a series of changes which will enhance its existing functionality.

We think CPW139f incorporates existing processes in a way that is cost-efficient, clear, and ensures customer experience will not be negatively impacted, particularly because impact on existing Service Level Agreements (**SLAs**) is minimal. We think the incorporation of 19 existing processes into the Bilateral Hub will benefit customers as it may lead to improvements in Trading Party efficiency in carrying out these processes and will increase visibility of Trading Party performance, supporting increased accountability. Particularly, we think the incorporation of unplanned events processes and their alignment with Retailer Wholesaler Group (**RWG**) guidance will increase standardisation in relation to Trading Party responses to unplanned events and incidents, minimising the risk of miscommunication or confusion between Trading Parties in such an event which could negatively impact customers. More broadly, we highlight the importance of Trading Parties adopting RWG guidance, as this can provide a level of standardisation that significantly improves the efficiency and execution of operational processes.

We think the first round of additional enhancements will improve the functionality of the Bilateral Hub, which we think will further improve Trading Party efficiency.

Changes such as those to the Bilateral Hub are often complex and focus on operational issues less familiar to those outside Trading Parties and MOSL. It is therefore essential for change proposals and the CCC's Final Recommendation Reports (**FRRs**) articulate clearly the purpose and impact of a change, including on customers. From reading the FRR, we were unclear on the full impact of the change and had to engage with MOSL before reaching our decision. We urge the CCC to ensure that its FRRs are concise and clearly explain the problem, solution, and impact of a code change to allow efficient and effective decision-making.

## Background

[CPW070/CPM043](#) (an Authority timetabled change proposal) created the programme of governance under which work would take place to address issues that had been identified relating to bilateral transactions (i.e., transactions between Wholesalers and Retailers). The first phases of the Bilateral Transactions programme, which integrated a number of processes into the Bilateral Hub, were delivered under this change proposal and concluded in November 2022. [MOSL's 2023-26 Business Plan](#) includes a subsequent programme of work which aims to continue to standardise, combine, streamline, or retire residual processes set out in the [Operational Terms](#) before bringing them into the Bilateral Hub which is aimed at improving the efficiency of interactions between Wholesalers and Retailers for the benefit of customers.

CPW139 and CPM051 establishes this programme of work and will be delivered through a series of implementations in the same way that previous Bilateral-related change proposals were implemented under the Ofwat-led programme via CPW070 (a, b, c, etc.). CPW139f represents the sixth implementation of processes into the Bilateral Hub under CPW139 and CPM050.

## The issue

The full benefits proposed by the Bilateral Transactions Programme cannot be realised until all operational processes have either been migrated into the Bilateral Hub, or retired, and Wholesalers have been able to decommission legacy systems. CPW139f seeks to support this aim by incorporating a number of processes into the Bilateral Hub through new and existing operational processes. Additionally, early delivery of some existing operational processes into the Bilateral Hub has allowed MOSL to deliver additional functionality enhancements prior to closing the programme. CPW139f includes the first delivery of these additional enhancements.

## The Change Proposal<sup>1</sup>

CPW139f was proposed by MOSL and seeks to do the following:

### 1) Implement the new processes J1 and J2 concerning Accredited Entity activity

CPW139f seeks to implement the new process J1 (Advance notice of activities performed by an Accredited Entity) and J2 (Notifying of activities completed by an Accredited Entity) into the Bilateral Hub. Together, these processes will incorporate nine existing operational processes into the Bilateral Hub. The current process in relation to Accredited Entities is lengthy and repetitive, and the proposed change will streamline the process.

The processes being incorporated into J1 and J2 are outlined below:

- **Process B2** – Installation of a meter performed by an Accredited Entity;
- **Process B4** – Meter accuracy test performed by an Accredited Entity;
- **Process B6** – Repair or replacement of a faulty meter performed by an Accredited Entity;
- **Process B8** – Retailer requested change to size, model, or location of the meter performed by an Accredited Entity;
- **Process B9** – Retailer requested change of a meter performed by an Accredited Entity (other than replacement following fault or a change to the size or location of the meter);
- **Process I2** – Disconnection requested by the Retailer and performed by an Accredited Entity in relation to NHH customer non-payment;
- **Process I6** – Disconnection requested by the NHH customer and performed by an Accredited Entity;
- **Process I9** – Reconnection requested by the Retailer and performed by an Accredited Entity; and
- **Process I12** – Reconnection performed by an Accredited Entity following a disconnection requested by the NHH customer.

Further detail about these processes can be found in the Code Change Committee's (CCC's) [Final Recommendation Report \(FRR\)](#).

Historically, the existing processes incorporated under J1 and J2 have only been used in small quantities, such that individually their low task volume would not have warranted

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<sup>1</sup> The proposal and accompanying documentation are available on the MOSL website at <https://www.mosl.co.uk/market-codes/change#scroll-track-a-change>

implementation as a standalone process in the Bilateral Hub.<sup>2</sup> However, it is the view of the Proposer that their delivery within the Bilateral Hub greatly contributes to the objective of allowing Wholesalers to decommission their legacy systems and realise the full benefits proposed by the Bilateral Transactions programme. Additionally, as the market develops, it is possible that Accredited Entity activity will increase or change. This change provides future-proofing as additions to Accredited Entity processes will require a change to a maximum of two processes rather than the current nine.

The processes being incorporated under J1 and J2 currently each have an associated, code-mandated SLA, but these are not subject to monitoring as there is no requirement for self-reporting. J1 and J2 will each have a Bilateral Hub-tracked SLA to support monitoring. There are minor differences between the existing SLAs and those being proposed for J1 and J2:

- Under CPW139f, relevant Accredited Entity application forms are required to be submitted by the Retailer within one business day of submitting the advance notice transaction. Under the current SLAs, there is no timeframe attached to this activity;
- Under the current processes B6 and B8, the SLAs to carry out meter works are 22 and 30 business days respectively. Under CPW139f, the SLA for both will be 25 business days to align with equivalent processes carried out by the Wholesaler; and
- Under CPW139f, a new SLA will be introduced to track the time taken by Wholesalers to update central systems following a notification of meter works completed by an Accredited Entity. Up to three business days are allowed.

The proposed SLAs are not associated with an Operational Performance Standard (OPS).

## **2) Implement the planned events processes through the existing process F7**

CPW139f will implement the three existing processes (D1, D2 and D3) related to long-term planning, short-term planning and reactive activities for which the Wholesaler is required to provide advance notice to the Retailer and its affected customers. The processes will be implemented through the already implemented Process F7 (General enquiries). Further details about these processes can be found in the [FRR](#). Wholesalers will submit these processes daily under F7 using the dedicated category of "Wholesaler

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<sup>2</sup> These processes were used a total of 986 times in 2020–21, and 1382 times in 2022–23.

action notification" introduced by CPW139f, and will include a notification to Retailers of planned events.

Historically, the task volumes of these processes have been significant.<sup>3</sup> Yet as these processes typically do not require any Retailer action, delivery through existing process F7 was deemed appropriate rather than introducing the three processes individually. There will be no difference to the SLAs attached to the current processes.

### **3) Implement the unplanned events and incidents processes through the new process E1 and existing process F7**

CPW139f seeks to implement the processes related to unplanned events such as emergencies, drinking water quality incidents, pollution incidents and droughts. The processes will be implemented under the new process E1 and the existing process F7.

The processes to be implemented are:

- **Process E1** – Identification of sensitive customers;
- **Process E2** – Maintenance and implementation of Wholesaler public health related site specific arrangements for managing events and incidents potentially affecting public health;
- **Process E3** – Unplanned changes to supply of water services and/or sewage services;
- **Process E4** – Drinking water quality incidents;
- **Process E5** – Sewer flooding and other public health risks such as pollution incidents or unconsented trade effluent discharges;
- **Process E6** – Droughts, dry weather conditions and other circumstances which give rise to water shortages; and
- **Process E7** – Emergencies (i.e. civil emergencies or national security events).

Further details about these processes can be found in the [FRR](#).

Processes to be delivered under F7 are those that typically do not require any action from the Retailer (Processes E3 (tier 3), E4 (tier 3) and E5). The remaining processes (E1, E2, E3 (tier 1 and 2), E4 (tier 1 and 2), E6 and E7) will be delivered under a new process E1, as these presented similarities in terms of required data items to allow their grouping under one process. Particularly, these processes will be dealt with individually rather than incorporated into daily notifications, as they relate to sensitive customers and public health incidences where Retailers may need to provide a bespoke reaction.

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<sup>3</sup> These processes were used a total of 40100 times in 2020-21, and 2846 times in 2022-23.

Where a Wholesaler raises an E1 request, it must provide the Retailer with a newly developed Wholesaler unplanned events template, which gives space for the Wholesaler to provide more information and submit only one set of information to the Retailer even when multiple SPIDs are impacted.

There will be no difference to the SLAs attached to the current processes.

CPW139f makes a change to Wholesalers' obligations related to customer contacts on unplanned changes. Currently, Wholesalers are required to inform Retailers of customer contact related to unplanned changes within two days, which is a substantial administrative burden. Most of the Retailer members of the Operational Advisory Group (**OAG**) and Code Advisory Group (**CAG**), which were involved in the development of CPW139f, did not identify benefits in the current approach. Therefore, CPW139f proposes to amend the Wholesalers' obligation to simply retaining the details of customer contacts and only providing them to the Retailer if requested through process F7. In the most serious and customer-impacting scenarios, this approach removes duplication of notifications to the customer. The relevant events will be added to the daily notifications sent by the Wholesaler to the Retailer.

#### **4) Deliver the first round of prioritised additional enhancements to the Bilateral Hub**

In late 2023, MOSL worked with OAG members to establish and prioritise a list of required functionality enhancements for the Bilateral Hub. CPW139f includes the first delivery of these prioritised additional enhancements, which includes:

- Preventing unnecessary delays caused by the current request for further information process by allowing Wholesalers to cancel a request for further information where the information has been obtained by other means;
- Amending Process H1 (Application for an allowance/volumetric adjustment) so that a mandatory 'end date' is only required in circumstances where this can be known;
- Including RWG standardisation codes when raising process B5 (failed meter read attempts and skip codes);
- Ensuring all relevant processes include an indication that they may result in charges to the Retailer;
- Ensuring that if a Wholesaler exited the market, existing service requests from the outgoing Wholesaler could be transferred to the incoming Wholesaler; and
- Adding six of the planned and unplanned event processes to a Wholesaler action notification template, and increase visibility of these submissions through creating a new valid set for these data items.

## **Impact**

The Proposer has argued that CPW139f furthers the following Principles of the WRC:

**Primary Principle** – The Bilateral Hub facilitates faster and more effective resolution of requests and improves the accuracy of market data to facilitate accurate customer billing. With specific regard to CPW139f, it facilitates Trading Party cooperation on those processes where the Wholesaler is not necessarily directly involved (Accredited Entity processes) or those that may require prompt notification and action (planned and unplanned events). The delivery of additional enhancements will improve transparency of additional charges potentially passed on to customers while also removing unnecessary bottlenecks given by the current functionality to request and obtain additional information prior to progressing a service request.

**Seamless NHH customer experience** – CPW139f continues the work of the Bilateral Transactions programme to standardise processes under one central system to support Retailers in providing a seamless NHH customer experience.

**Simple, cost effective and secure** – The Bilateral Hub offers a simple, cost-effective, and secure system for Trading Parties who currently rely upon multiple systems for progressing requests. Having one central system also allows for recovery processes to be consistently maintained in line with code requirements.

**Transparency and clarity** – The proposed incorporation of J1, J2 and E1 into the Bilateral Hub is accompanied by clear and transparent code drafting, making new arrangements and standards complete, concise, structured, unambiguous and readily accessible to both existing and prospective Trading Parties. Furthermore, the Bilateral Hub will enable previously unreported performance to be monitored and reported independently in a more robust, objective, transparent, and consistent way, improving confidence in the market.

**Efficiency** – The Bilateral Transactions programme will increase the efficiency and standardisation of process performance and effective resolution of customer issues. The approach reduces the complexity associated with the use of multiple processes and interfaces where a Retailer's customer base is across multiple Wholesale areas. Furthermore, the centralised technology platform will utilise links to other central systems (e.g., CMOS) to pre-populate fields with appropriate data, helping to maintain and improve data quality and avoid manual errors.

**Non-discrimination** – The Bilateral Hub is intended to be universally beneficial to market participants and does not discriminate against any existing or prospective Trading Party or group of such. Standardising processes such as those included under the new J1, J2 and E1 processes in the Bilateral Hub may also remove barriers to Retailers operating across multiple Wholesaler areas by only having to use one system for requests.

## Industry engagement and assessment

The recommendation reports presented as part of CPW139 and CPM051 do not feature a traditional consultation. Instead, the OAG and CAG were directly involved in the assessment of CPW139f, each consisting of subject matter experts from Retailers, Wholesalers, MOSL, and where appropriate, third-party integrators. Relevant feedback which emerged from these groups included:

- The OAG and CAG welcomed the grouping of the nine current Accredited Entity processes under J1 and J2, as it makes these processes easier to locate compared to how they could be under either part B or I of the operational terms. If future market developments require additional or amended processes included under J1 and J2, the proposed approach will facilitate this.
- OAG members confirmed a preference for templated spreadsheets in relation to requirements about submissions for multiple impacted SPIDs in planned or unplanned events. This prevents raising individual requests for each SPID.
- The OAG was concerned that the "request and provide additional information" functionality in the planned and unplanned events processes may result in unnecessary delays. The proposer said the first delivery of additional enhancements, including the functionality to cancel a request for further information, mitigates this concern.
- The OAG advised that processes relating to sensitive customers (current E1) need to be dealt with individually. The proposer noted that the requirement to raise individual requests through the new process E1 addresses this concern.
- The CAG noted that J2 carries a two-hour SLA to notify completion of a disconnection or reconnection, but as the Bilateral Hub only tracks business days, rather than hours, this remains a code mandated SLA.

## Views of the Customer Representative

The Consumer Council for Water (**CCW**) provided the following view on the change:

*"We continue to support the integration of bilateral processes into the Bilateral Hub. As well as for better monitoring of the processes, it is important that bilateral processes continue to be moved into the Hub so they can be subject to standardisation and centralised monitoring, which should improve trading party accountability, and lead to improved customer outcomes.*

*We agree with the proposal to deliver the Accredited Entity (AE) processes under the new J1 & J2. Given the low task volumes, it is sensible to streamline these, and implement under the existing F7 process. From a customer viewpoint, they will reasonably expect a particular activity to be completed as quickly as possible, with no*



*needless delays, regardless of who is carrying this out. It is therefore positive that process repetitions that currently exist in the Operational Terms for the AE processes will be removed as a result of this change. However, due to the advance notice period, the use of an AE may mean an activity will still take longer to complete than one completed by the wholesaler. Therefore, while this change might achieve a reduction in the time taken to complete, customer outcomes may still differ depending on the party chosen by the retailer to complete the work. If the use of AEs increases, we would urge MOSL to re-examine the SLAs to ensure there is even further alignment with processes where they are not involved.*

*Given the variety of different processes that are being merged under J1 & J2, we support the need for retaining individual process requirements where needed. For example, the relevant regulatory requirements concerning a disconnection for non-payment need to be as prominent in the new Hub process as they are currently in the Operational Terms. We do not want to see customer protection inadvertently compromised by this change, so we need assurance that the necessary steps will be preserved in the new process.*

*We support the merging of the existing E processes into new process E1. Given the impact that unplanned events can have on customers, there may be benefits in having them as one process given how the individual process requirements are interlinked. It is also positive that the tiered approach outlined in the RWG good practice guide is being formalised. The customer impact will differ depending on the nature of the unplanned event, so it is important that wholesalers are subject to more stringent requirements in respect of the most impactful events (Tier 1 & 2). However, while we understand that there will no requirement on wholesalers to notify retailers of Tier 3 events, this should not prevent them voluntarily communicating about this, if they judge it is needed.*

*We also support the various enhancements that have been proposed. However, we are concerned at the possibility that some wholesalers may currently not progress a service request, despite having the information to do so. A lack of current functionality in the Hub to advise the retailer and progress the issue should not prevent wholesalers from doing so, nor does it stop them advising the retailer by other means. While we support communication and processes being managed through the Hub, trading parties ultimate priority should be their customers, even if this sometimes means using alternative communication and processes. Therefore, while we support the proposed change, we would like assurance from MOSL or the OAG that the status of a request in the Hub is not necessarily reflective of what happens in reality.*

*As we stated when the F7 process was created, it is important that the task volumes are carefully monitored. If a particular type of request increases in number, the creation of a separate trackable process in the Hub may be warranted to ensure that it is subject to*

*the same standardisation and centralised monitoring as all other processes, which should lead to greater accountability, and improved customer outcomes.”*

## **Code Change Committee (CCC) discussion and recommendation**

The CCC considered this Change Proposal at its meeting on 9 April 2024. It recommended, by unanimous decision, that Ofwat approve this proposal. The proposed implementation date set out in the CCC's FRR is 26 June 2024 if Ofwat approval is received by 7 June 2024.

In making this recommendation, the CCC unanimously agreed with the rationale provided by the Proposer against the objectives and principles of the WRC.

One member reiterated the benefits brought about by increased standardisation, particularly in relation to unplanned events. It was noted that the provision of updates in a standardised format and through a centralised platform will improve communication to customers. One member emphasised the importance of continually monitoring process F7 in case usage spikes for a particular issue which would necessitate its own standalone process. MOSL confirmed that monitoring will be in place.

## **Post Implementation Review (PIR)**

The Proposer recommended that a PIR is not recommended for CPW139f, as the extensive assurance and Trading Party surveys carried out for each phase of the Bilateral Transactions programme would mean a PIR would result in a duplication of work. The CCC agreed with this position.

## **Our decision and reasons for our decision**

We have considered the issues raised by the Change Proposal and the supporting documentation provided in the CCC's [FRR](#) and have decided to approve the proposal. We have concluded that the implementation of CPW139f will better facilitate the principles and objectives of the Wholesale Retail Code detailed in Schedule 1 Part 1 Objectives, Principles and Definitions, and is consistent with our statutory duties.

The implementation of a number of existing processes into the Bilateral Hub will support the standardisation of processes, facilitating Trading Party efficiency and therefore improving customer experience. Centralising processes in the Bilateral Hub will also allow greater central monitoring of Trading Party activity, improving accountability.

CPW139f's implementation of a number of low-volume processes under J1 and J2 is efficient and minimises cost. We think grouping processes concerned with Accredited Entities together and removing repetitions in the Operational Terms will improve Trading Party efficiency when dealing with such processes, and will allow any future necessary changes to these processes to be made efficiently should Accredited Entity activity evolve in the future.

The implementation of processes D1, D2 and D3 under process F7 is similarly efficient and cost-effective as these processes do not typically require action from the Retailer. We agree with CCW that the merging of existing processes related to unplanned events and incidents is positive given the individual process requirements are interlinked, alongside the fact that merging processes is cost-effective. Additionally, formalising the tiered approach outlined in the RWG good practice guide is positive as this will increase standardisation in dealing with emergency and unplanned events, mitigating the risk of misunderstandings or miscommunication between Trading Parties which could negatively impact customer experience. We have previously noted, such as in our December 2023 [consultation on proposed changes to the Customer Protection Code of Practice \(CPCoP\)](#), that Trading Party interaction in an unplanned or emergency event is an area where change is needed to safeguard a positive customer experience. We welcome that this change may support endeavours in this area. More broadly, we highlight the importance of Trading Parties adopting RWG guidance, as this can provide a level of standardisation that significantly improves the efficiency and execution of operational processes.

We think delivery of the first round of additional enhancements will improve Bilateral Hub functionality, enabling Trading Parties to work more efficiently and effectively. We particularly welcome the inclusion of data items to promote the standardised and consistent use of skip codes as set out by the RWG, as this will enhance the visibility and reporting of failed meter read attempts. We also welcome the ability for MOSL to transfer service requests between trading parties where this is necessary to ensure that there is minimal risk of disruption to the services that customers receive.

We welcome MOSL's commitment to monitoring the use of the F7 process to identify any need to create new processes to address recurring issues under F7.

We note the concern of CCW that due to the advance notice period, the use of an Accredited Entity may mean an activity will still take longer to complete than one completed by the Wholesaler, and therefore if Accredited Entity use increases, MOSL should re-examine the SLAs. We agree that MOSL should closely monitor the use of the J1 and J2 process to identify any need to revise associated SLAs, noting that the incorporation of Accredited Entity processes into the Bilateral Hub will enable this monitoring to occur in a way that it currently cannot as there is no requirement for self-reporting. We also note CCW's point that in some cases, bilateral transactions may

need to be managed outside the Bilateral Hub where current functionality is lacking. We highlight to Trading Parties that the existence of the Bilateral Hub does not exclude requests being taken forward outside the Hub in cases where this would be the most appropriate and efficient option to best serve customers.

## SLAs

The majority of existing processes being implemented under CPW139f will see no change to their existing SLAs, and therefore we are not concerned that customers are at risk of receiving poorer service as a result of the change. We note that for the current process B6 (repair or replacement of a faulty meter performed by an Accredited Entity), CPW139f will include an SLA to require meter works to be carried out within 25 business days, an increase from the 22 business days required under B6's current SLA. However, as this increase is minor and will align with other comparable processes, we think the benefits from increased standardisation and alignment (such as Trading Party efficiency) justify the risk that some meter works may be carried out slightly slower than they would have been under the current arrangements.

## Decision not to consult

Under Sections 66DB and 117G of the Water Industry Act, if Ofwat is minded to approve a change to the WRC, it is required to issue a statutory consultation on the change unless it is assessed as being unnecessary to consult. We assessed that it was unnecessary to consult on this change for the following reasons:

- **Does not significantly depart from the status quo** – as CPW139f implements existing processes into the Bilateral Hub, it does not substantially alter the status quo. The change does incorporate some changes to SLAs and Trading Party obligations, but these are very minor and are not anticipated to significantly alter behaviour, and no new OPS charges are introduced.
- **Does not impose a new financial burden on Trading Parties** – as this change forms part of the Bilateral Transactions programme, for which funding was approved as part of [MOSL's 2023-26 Business Plan](#), it does not introduce any significant new financial burdens on Trading Parties.
- **Change is not contentious** – We are satisfied from our engagement with market stakeholders that there is strong support across the board for the Bilateral Transactions programme. There was no indication from the OAG and CAG, which incorporate a wide range of stakeholders, that the change is contentious. The CCC also unanimously agreed to the change.

## CPW139f's FRR

Code changes related to the Bilateral Hub are complex and often focus on operational issues that are less familiar to those outside MOSL and Trading Parties. It is therefore essential that code change proposals and the CCC's FRRs articulate clearly and comprehensibly the purpose and impact of a change, including on customers. In initially reviewing the FRR for CPW139f, we were unclear on the full impact of the change, particularly in relation to the proposed impact on SLAs. We engaged with MOSL to clarify our understanding before reaching our decision. Going forward, we urge the CCC to ensure that its FRRs clearly and succinctly describe the impact of a change, both to support the process of its own decision-making and to enable us to efficiently make decisions on changes. For example, a short summary table outlining the impact of a change could be particularly helpful for complex Bilateral Hub changes.

### **Alignment with Principles of the WRC**

We agree that CPW139f will further the **Primary Principle** by facilitating the work of the Bilateral Transactions programme, which will allow the more effective resolution of bilateral requests and improvements to the accuracy of market data to support accurate customer billing and timely resolution of issues. With specific regard to CPW139f, we think implementing a number of existing processes into the Bilateral Hub will facilitate Trading Party efficiency, which may allow customers to benefit from a quicker and more seamless service in these areas. Increased standardisation in dealing with unplanned events and incidents may also benefit customers through mitigating the risk of misunderstanding or miscommunication between Trading Parties in such an event. Additionally, we think the additional enhancement which will allow MOSL to transfer service requests between trading parties if necessary will minimise the risk of customer disruption.

The Bilateral Transactions programme and CPW139f will introduce monitoring for processes that have previously not been subject to any, increasing Trading Party accountability. This supports the principle of **transparency and clarity**.

We think CPW139f will contribute to a **seamless NHH customer experience** through standardising processes under one central system for Trading Parties. The change is **simple, cost effective and secure** as the incorporation of multiple existing processes under J1, J2, E1 and F7 minimises costs and complexity, and the Bilateral Hub offers a simple, cost-effective and secure system for Trading Parties to conduct bilateral transactions. We think CPW139f will increase the **efficiency** of the resolution of customer issues through increased standardisation of Trading Party interaction through the Bilateral Hub. Increased standardisation can also reduce costs incurred by Trading Parties, supporting the **continued development and sustainment of an effective market**. The Bilateral Hub can be used universally by Trading Parties and therefore the principle of **non-discrimination** is furthered.

## **Decision notice**

In accordance with S.66DC(1)(a) and S.117H (1)(a) of the Water Industry Act, the Authority approves this Change Proposal.

**Dan Mason**

**Director, Business Retail Market**