Market Participant Identity Verification Guidelines

# **Market Domain Data Market Participant Identity Verification Approach Document**

**Version 1.0 For Approval** 

**Effective Date February 2020** 

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### **Document Control**

Version	Date	Reason for Change
0.1 Draft	24/01/2019	Draft for Working Group discussion
1.3 Draft	Various	Updates following WG and CoMC
		discussions
1.4 Draft	01/05/2019	Review by sponsor and CDSP prior
		to inclusion for information in the
		UNC Modificaton.
1.0 For Approval	21/05/2019	Final version to accompany
		modification for information.

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#### **Development of Rules**

- (a) The requirement to publish and maintain the Market Participant Identity Verification Approach Document is specified in the DSC Service Lines. Maintenance of this document requires that this document is to be published and revised from time to time.
- (b) This document shall be kept up to date and published by the Central Data Services Provider (CDSP).
- (c) The Rules set out below meet the CDSP obligation to prepare this Market Participant Identity Verification Approach Document, while the Document Control Section records changes which have been made to this document.
- (d) This document can only be modified in accordance with the consent of the DSC Contract Management Committee. In the event of escalation with respect to modification of this document, the DSC Committees are a sub group to the Uniform Network Code Committee and referral would be to that Committee.
- (e) The CDSP shall conduct an annual review of this document to ensure it remains robust. Any amendments will be approved as per (d).

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#### 1 Introduction

- 1.1 This document describes the process that the CDSP shall complete in order to maintain the Market Domain Data (MDD) Market Participant Identity List (MP Id List) and allow Market Participants to request insertion, amendment and deletion from the MP ID List via an MDD Market Participant Identity Application (MP Id Application).
- 1.2 The MP Id List shall define and control the Market Participant Identity (i.e. the Short Codes) used to denote an organisation participating in the gas industry, and used to identify such Market Participants in industry messages, including those with the Central Switching Service.
- 1.3 The MP ld List controls the following Market Participant Role Types (Role Types):
  - 1.3.1 Transporters including Transmission Network Operators, Distribution Network Operators and Independent Gas Transporters
  - 1.3.2 Shipper Users
  - 1.3.3 Trader Users
  - 1.3.4 Gas Suppliers
  - 1.3.5 Meter Asset Managers (also referred to as Metering Equipment Managers in the Retail Energy Code / CSS messages)
  - 1.3.6 Meter Asset Providers
  - 1.3.7 Automated Meter Reading Service Providers (ASPs)
  - 1.3.8 Smart Metering System Operators (SMSOs)
  - 1.3.9 [Other]
- 1.4 The CDSP will perform verification checks specific to each Role Type.
- 1.5 The CDSP process relies upon verification of the <u>MP Id Applications</u> against specific data repositories recording information about the

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#### Market Participant Identity Verification Guidelines

Market Participants wishing to be included in the MP Id List. This document describes the sources of data against which the CDSP is required to verify MP Id Applications.

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1.6 This document also details further Business Rules, that are applied by the CDSP in administering the MP Id List e.g. company name amendments. Deleted: [

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1.7 MP Id Applications seeking to remove a Market Participant from the MP Id List will not be subject to the same [Verification Checks], but will be assessed against these further [Business Rules] pertinent to deletion or end dating of a Market Participant Identity.

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1.8 These Verification Checks and Business Rules are the minimum requirement that must be applied by the CDSP prior to issuing the proposed MDD Market Participant Identity Release. Where a Verification Check or Business Rule is failed the CDSP shall notify the Applicant of the failure and the reason for such failure. The Market Participant may seek to address the reason for the failure but if this is not resolved in sufficient time, the CDSP will not include the Market Participant Identity within the proposed MDD Market Participant Identity Release.

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#### 2 Market Participant Identity Process

- 2.1 Any Market Participant who is Licenced or required to accede to an Industry Code (including MAMCoP in the case of MAMs) and who undertakes a role controlled by the Role Types described within Section 1.3 of this document may submit a MP Id Application to insert their Market Participant Identity. Where a Market Participant is not Licenced or is not required to accede to an Industry Code¹ an existing Market Participant must sponsor the MP Id Application to insert that Market Participant Identity. Once a Market Participant is included within the MP Id List they may submit an MP Id Application to amend, end date or delete their entry in the Market Participant Identity List. The CDSP may also submit a change in order to insert, amend, end date or delete any Market Participant Identity or entry in the MP Id List. CDSP and Market Participant requests are subject to the same governance described in this document.
- 2.2 The CDSP shall annually publish a timetable to support release of revisions to the MP Id List. This timetable shall include the deadline by which MP Id Applications must be submitted by Market Participants to the CDSP, the publication date by the CDSP to solicit representations from existing Market Participants, the publication date of the release content and the effective date of each release.
- 2.3 Where the <u>MP Id Application</u> is a function of Accession to the UNC, the CDSP shall discuss and outline with the Market Participant the relevant timescale for submission of the <u>MP Id Application</u> on their behalf.
- 2.4 [Market Participants should complete an annual process where they verify their Market Participant Identities. Where they identify any instances where the MP Id List is out of date they shall raise the necessary MP Id Application in order to correct this.]

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<sup>1</sup> For example, Meter Asset Providers and MAMs not required to participate in MAMCoP.

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#### 3 Verification Checks

3.1 Any Market Participant who undertakes a role controlled by the Role Types described within this document may submit a MP Id

Application to insert, amend, end date or delete their entry within the MP Id List. The following table provides the verification checks that are performed for each Market Participant Role Type.

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Checks	Transp orter	IGT Network	Shipper User	Trader User	Supplier	Meter Asset Manager	Meter Asset Provider	ASP	SMSO
Companies House Register Checks Company Name	Х	X	Х	Х	Х	X	Х	Х	X
Licence Checks	Χ	X	X	Χ	X				
VAT Checks	Χ	X	X	Χ	X	Х	Х	Χ	Χ
Credit Check	Х	Х	X	Х	Х	Х	Х	X	Χ
Accession to Industry Code		UNC <sup>2</sup>	UNC <sup>1</sup>	Х	SPAA <sup>3</sup>	MAMCoP Accreditati on <sup>4</sup>			
DSC Contract Signed		Х	Х						
Deed of Undertaking					X				

- 3.2 Companies House Register Checks means that the Market Participant applying for the Market Participant Identity, or seeking to amend their entry within the MP Id List, is registered within the Companies Register and held on the Companies House Website for the country of registration and that the Company Name, Registered Address and Company Number on the application corresponds to those recorded on the register.
- 3.3 Authority Licence Checks means that the Market Participant applying for the Market Participant Identity, or seeking to amend their entry within the MP Id List, is recorded as a Licence holder on the Authority List of Gas Licences recorded on the Authority website. The Company Name, Registered Address and Company Number on the MP Id Application must correspond to those recorded on the register.

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3.4 VAT Checks means that the Market Participant applying for the

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<sup>&</sup>lt;sup>2</sup> In the event that full UNC Accession has not been achieved, other agreements may have been entered into during the Accession process (e.g. Confidentiality Agreements) such that the MDD Proposal may be initiated.

<sup>&</sup>lt;sup>3</sup> As defined on the SPAA Ltd Website as a SPAA Party. This list includes I&C Suppliers who are excluded from certain Schedules.

<sup>&</sup>lt;sup>4</sup> Meter Asset Manager Code of Practice (MAMCoP) Accreditation sets out the requirements for Meter Asset Managers (MAM) that wish to be accredited under the MAMCoP Registration scheme. The Gas Supplier and Transporter Licences put an obligation on licensees to use accredited MAMs.

Market Participant Identity, or seeking to amend their entry within the MP Id List, is registered within the VAT register and held on the VAT Website for the country of registration and that the Company Name, Registered Address and VAT Number on the application corresponds to those recorded on the register.

3.5 Credit Checks means that the Market Participant applying for the Market Participant Identity, or seeking to amend their entry within the MP Id List, will be verified using a valid credit agency to understand the financial behaviour of the requesting Market Participant. For parties acceding to the UNC this process will also be used to determine whether any upfront security is required. The Company Name, Registered Address and Company Number on the application must correspond to those recorded by the credit agencies.

- 3.6 Assession to Industry Code Checks means that the Market Participant applying for the Market Participant Identity, or seeking to amend their entry within the MP Id List, has signed the relevant agreements applicable to their Role Type.
- 3.7 Deed of Undertaking is an agreement executed with a Supplier organisation for the purposes of Standard Licence Condition 18 of the Gas Supply Licence.

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#### 4 Additional Business Rules to applied by the CDSP

- 4.1 The following sections identify additional Business Rules to be applied by the CDSP in assessing an addition, amendment or deletion from the MP Id List. This list of Business Rules reflect additional working practices that have been agreed to be adopted by industry parties in order to support the efficiency of future data flows and limit fundamental impacts to Market Participants.
- 4.2 Relationship between Licenced Legal Entity and Market Participant Identities
  - 4.2.1 A single Market Participant Identity shall be provided for each Licenced Legal Entity for the Shipper Role Type. A Market Participant Identity can only be assigned to another Legal Entity following Transporter approval and in the event of a Novation of all historical and future rights and obligations.
  - 4.2.2 More than one Market Participant Identity may be provided for each Licenced Legal Entity for the Supplier Role Type.
- 4.3 Once a Market Participant Identity has been deleted from the MP Id List, the Market Participant Identity of a UNC Party Role Type (i.e. Supplier, Transporter, IGT or Shipper), will not be reassigned to an alternative Market Participant. Where the Market Participant Identity has never been associated to a UNC Party Role Type, then the Market Participant Identity may be reassigned in the event of the CDSP carrying out fit and proper checks. These will include where a Market Participant is still an active registered company but not active in the gas market the CDSP will seek their permission and also undertake a system check to ensure that there is nothing registered against that short code before re-assigning.
- 4.4 A Market Participant Identity may be utilised for multiple Role Types provided that the same Legal Entity is valid for all Role Types. All checks will be performed against each Role Type which the Market Participant Identity is to be applied.
- 4.5 A Market Participant Identity must remain on the <u>MP Id</u> List until they are not recorded as a Market Participant associated to any Supply Meter Point and are removed from all Market Participant Systems.
- 4.5.1 The CDSP may raise a deletion request where instances of a Market Participant Identity are still recorded within the UK Link system,

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provided that a future end date is provided. The deletion request must also indicate from which date such Market Participant Identity will not be valid in Central Systems (i.e. UK Link system or the Central Switching Service). E.g. in the event of a termination of a Licenced entity they would be invalid with immediate effect in Central Systems but would be shown on the Market Participant Identity List with a separate future end date.

4.5.2 A Market Participant Identity for a Role Type of Supplier may not be submitted with an end date any less than [two (2) years] from [deletion request submission / termination / exit] to account for potential erroneous transfers.

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#### 5 Governance Cycle

- 5.1 In addition to the Verification Checks and the Business Rules described above a representation cycle will be provided to existing Market Participants to identify any impacts. The Verification Checks and Business Rules are expected to be maintained such that matters identified within the representation cycle are infrequent.
- 5.2 The CDSP shall issue on an annual basis the MDD Release Schedule that shall include the deadline for MP Id Applications by Market Participants to the CDSP, publication date by the CDSP to solicit representations from existing Market Participants, the publication date of the release content and the effective date of each release.
- 5.3 The DSC Contract Management Committee shall be responsible for approval of the release content, although this may be delegated to a Sub Committee. Following approval the CDSP shall publish the next MDD Market Participant Release Content, Any Market Participant may attend the agenda item that considers the approval of the release content to the Market Participant Identity List.
- All Market Participant will be invited to make representations. Market Participants must provide and maintain contact details from which the CDSP will seek representations. Where representations are made by Market Participants the CDSP shall assess whether the comments require an amendment to the MP Id Application, and agree with the originator of the MP Id Application any changes. The Proposer may decline to make any changes to their Application. Any representations received in line with the timetable, along with any changes will be published with the meeting papers for the DSC Contract Management Committee or relevant Sub Group.
- 5.5 The representations are expected to be limited since the Verification Checks and Business Rules are expected to provide a robust framework against which the CDSP shall assess MP Id Applications reducing the need for existing Market Participants to intervene.
- 5.6 Challenge Outcome \_\_, If a party wishes to challenge the outcome of an MP Id Application this should be done at the DSC Contract Management Committee or relevant Sub Group. The DSC Contract Management Committee can instruct the CDSP to reassess an application or MP Id Application.

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- 5.7 Publication - The next MDD Release Content shall be published on the CDSP Website, or another means agreed by the DSC Contract Management Committee, distinct from the live MP Id List in accordance with the published timetable.
- 5.8 Any Appeals should be made to the Authority within 10 working days. Appeals can be made by a Market Participant or the Proposer, following the DSC Contract Management Committee or relevant Sub Group, but prior to the date that the CDSP is obliged to publish the next release. Where such an Appeal is made the Market Participant must notify the CDSP, and until such time as the Appeal outcome is known the MP Id Application shall not be implemented – i.e. the Market Participant Identity shall not be added to the list, or the amendment made.

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#### 6 Definitions

- "Company Name" is a noun phrase that is used on legal papers and other forms when dealing with a company as an artificial person or legal entity.
- "Company Registered Address" A Company Registered Office is the official address of an incorporated company, association or any other legal entity.
- "Company Registered Number" A unique number that is given to an Market Participant at of point of registering.
- **"VAT Number"** A unique VAT number that other businesses need to reclaim the tax paid.
- "Credit Checks" A Credit Check, also known as a credit search is carried out against the requesting party, to look at information from their credit report to understand their financial and risk level and to whether any upfront security is required to be put in place prior to taking any services.
- "Network Accession Agreements" Are entered into between Network's and the Applicant pursuant to which the Applicant shall accede to the Network's Shippers Framework Agreement for the purposes binding itself by the Network Code.
- **"Confidentiality Agreements"** The Applicant is intending to apply to become bound by the Network Code but has not at the date of this Agreement executed the Accession Agreement to become so bound.
- "Licence Checks" is recorded as a Licence holder on the Authority List of Gas Licences.
- **"DSC Contract"** A Data Services Contract Accession Agreement (DSCAA) will be required to be signed by the User to accede to the DSC Framework Agreement dated 15th February 2017 and that the all parties will be bound by the DSC Terms and Conditions.
- **"Legal Entity"** An individual, company, or Market Participant that has legal rights and obligations.

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