

Change Report

For Information

CCC38_01

1 Summary

Synopsis	This report provides an update to the Code Change Committee on the status and progress of market code Change Proposals between 28 February and 28 March 2025
Recommendation	The Code Change Committee is invited to: <ul style="list-style-type: none">• Note the contents of the paper
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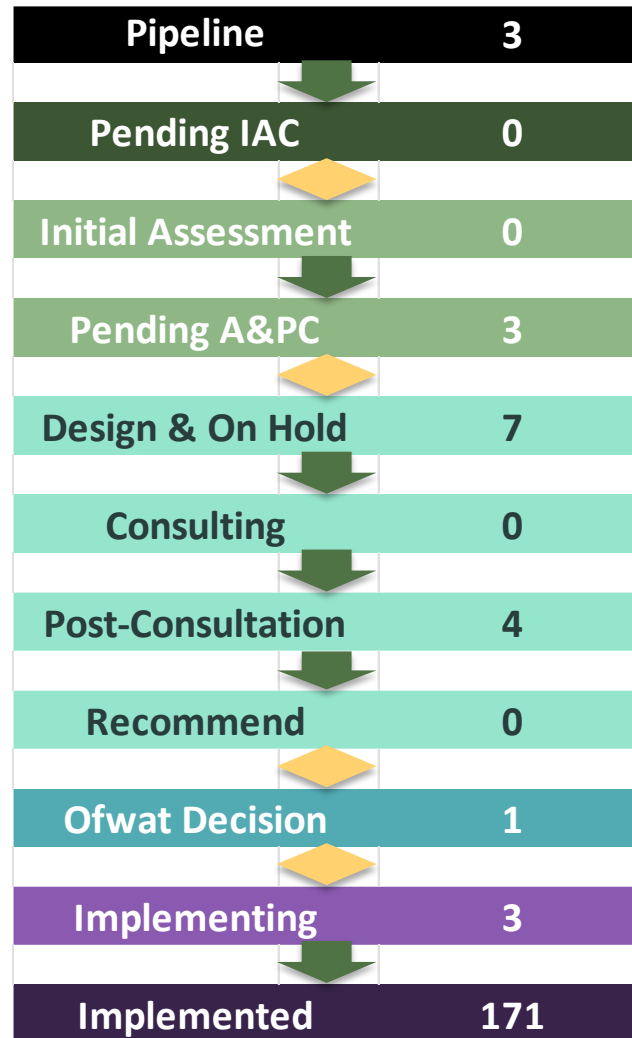
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3 Purpose

This paper provides a monthly update on the change programme and is used by the Code Change Committee (CCC) to schedule and prioritise new and existing code changes. When scheduling a change newly accepted into the change process, the committee will consider its priority relative to other changes and what modes of engagement should be deployed during its assessment and development, including whether committees or working groups should be involved.

4 Status



5 Overview

This section provides an overview of all current code changes. This includes changes that pass the [Initial Acceptance Criteria \(IAC\)](#) but have yet to be presented to the CCC, changes assessed by the committee against the [Acceptance & Prioritisation Criteria \(A&PC\)](#) and are either pending revision by the proposer or being assessed and developed for recommendation, recommended changes pending a decision by Ofwat and approved changes being implemented.

Change Title	Reference	Description	Status
Cyclic Read Skip Codes	CPW162	Standard reasons for not providing an actual cyclic read collected in CMOS	Pending A&PC
Estimated Transfer Reads	CPW159	Clarify when an estimated transfer read can be used in place of an actual	Pending A&PC
Third Party Requests to Wholesalers	CPW161	Requires wholesalers to respond directly to third parties making requests on behalf of customers e.g., to install a datalogger or disconnect a premises	Pending A&PC
Bilateral Hub	CPM051 & CPW139	Streamlining and migration of second programme of operational processes into the Bilaterals Hub	Design
CMOS Data Retention Beyond Seven Years	CPW157	Extend CMOS data retention from current seven years to provide a reference when resolving post-settlement billing disputes and avoid changes in current settlement due to deletion of scarce historical meter reads	Design
Customer and Third-party Access to Consumption Data	CPM060 & CPW156	Provide approved third party intermediaries with access to non-household market water consumption data	Design
Data Quality Assurance Flags	CPW155	CMOS flags to assist in data assurance activities by identifying that a data item has already been quality assured or checked	Design
Data/Report requests of the Market Operator	CPM061 & CPW158	Align codes with legislation and clarify when the Market Operator can provide data and to whom	Design
Market Performance Framework Reform	CPM058 & CPW149	Overarching code change to reform the Market Performance Framework.	Design
MPF Reform Part C - KPIs Phase 1	CPM058 & CPW149 'c1'	Key Performance Indicators and Incentives for Cyclical and Transfer Reads in the reformed Market Performance Framework	Design
MPF Reform Part C - KPIs Phase 2	CPM058 & CPW149 'c2'	Key Performance Indicators and Incentives for Bilateral Hub and Data Assurance in the reformed Market Performance Framework	Design
Deductions and Withholdings under Dispute Process	CPM054.R1 & CPW145.R1	Increase transparency and standardise process and timescales for resolving amounts invoiced by wholesalers but withheld by retailers due to a dispute or query	Post-Consultation
Interim Supply: Cost Recovery Mechanism	CPW153	Retrospective recovery of additional onboarding costs following Interim Supply Allocation	Post-Consultation
Interim Supply: Initial Cost Support	CPW154	Temporary alleviation of cashflow pressures on Interim Retailers, e.g. by deferring credit or wholesale charges	Post-Consultation
Post-RF Customer Refunds	CPW152	Mechanism to enable customer refunds relating to periods more than 44 months ago or more than 16 months ago if materiality thresholds for an Unplanned Settlement Run cannot be achieved	Post-Consultation
Wholesaler MPS Charge Discontinuation	CPM062 & CPW160	Immediate discontinuation of wholesaler MPS incentives not being taken forward by the new market performance framework	Ofwat Decision
Bilateral Hub (Additional enhancements Pt4)	CPW139i	Bilaterals Hub additional enhancements part 4	Implementing
BR-MeX	CPM052 & CPW140	Metrics and business and retailer surveys to inform the Wholesaler price control	Implementing

The following table shows changes based on their current status and forecast implementation date:

Green - Accepted and in-flight

Dark Green - Accepted and on-hold

Yellow - Due for acceptance by the CCC

Purple - Anticipated to be presented at future CCC meetings

Bold - Authority timetabled.

By Implementation Date						
Reference	Status	Change Title	Change Type	Implement	Next CCC	Next Gate
CPM051 & CPW139	Implementing	Bilateral Hub	Functional	16 Dec 25	13 May 25	Recommend
CPW153	Post-Consultation	Interim Supply: Cost Recovery Mechanism	Structural	12 Sep 25	13 May 25	Recommend
CPW154	Post-Consultation	Interim Supply: Initial Cost Support	Structural	12 Sep 25	13 May 25	Recommend
CPM054.R1 & CPW145.R1	Post-Consultation	Deductions and Withholdings under Dispute Process	Functional	10 Oct 25	13 May 25	Recommend
CPM058 & CPW149 'c1'	Design	MPF Reform Part C - KPIs Phase 1	Structural	31 Oct 25	8 Jul 25	Recommend
CPW152	Post-Consultation	Post-RF Customer Refunds	Functional	14 Nov 25	10 Jun 25	Recommend
CPM060 & CPW156	Design	Customer and Third-party Access to Consumption Data	Structural	8 Dec 25	12 Aug 25	Recommend
CPM061 & CPW158	Design	Data/Report requests of the Market Operator	Functional	8 Dec 25	17 Sep 25	Recommend
CPM058 & CPW149	Design	Market Performance Framework Reform	Structural	3 Apr 26	13 Jan 26	Recommend
CPM058 & CPW149 'c2'	Design	MPF Reform Part C - KPIs Phase 2	Structural	3 Apr 26	13 Jan 26	Recommend
CPW157	Design	CMOS Data Retention Beyond Seven Years	Structural	15 Apr 26	14 Nov 25	Recommend
CPW155	Design	Data Quality Assurance Flags	Functional	11 May 26	8 Jul 25	Recommend
CPW161	Pending A&PC	Third Party Requests to Wholesalers	Functional	13 Mar 26	8 Apr 25	Accept & Prioritise
CPW159	Pending A&PC	Estimated Transfer Reads	Functional	8 May 26	8 Apr 25	Accept & Prioritise
CPW162	Pending A&PC	Cyclic Read Skip Codes	Functional	7 Dec 26	8 Apr 25	Accept & Prioritise
PIP211	Pipeline	Clarifying Deferral Rules	Functional	13 Mar 26	13 Aug 25	Accept & Prioritise
PIP192	Pipeline	Sharing Granular Consumption Data	Structural	7 Dec 26	8 Jul 25	Accept & Prioritise
PIP239	Pipeline	Market Entry Assurance	Functional			Accept & Prioritise

6 Change Forecast

The following table summarises changes currently in or forecast to be accepted into the change process over the next eight months. The lifecycle of a change is marked by the following events:

A&P	Accept and Prioritise into the change process having satisfied the CCC that it meets the Acceptance & Prioritisation Criteria .
Recm	Recommend by the CCC to Ofwat for rejection or approval.
Decn	Decision by Ofwat to reject or approve. Prior to the decision, potential decision deadlines are denoted by Dec1 and Dec2 in light purple.
Impn	Implement into market codes, processes and systems. Prior to the decision, potential dates are denoted by Imp1 and Imp2 in light green.

The committee may advise and re-advise Ofwat on the relative priority of changes. 'Ofwat Status' shows the progress of its decisions and relative priorities advised by the CCC at its last meeting.

A&P	Accept & Prioritise	Decn	Ofwat Decision	Impn	Implementation
Recm	Recommend	Dec1	Planned Decision	Imp1	Planned Implementation
		Dec2	Planned Decision	Imp2	Planned Implementation

Ref	Change Title	Status	Ofwat Status	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25
CPM052 & CPW140	BR-MeX	Implementing	Decided		Recm	Decn	Impn							
CPW139i	Bilateral Hub (Additional enhancements Pt4)	Implementing	Decided	Recm	Decn									
CPM051 & CPW139	Bilateral Hub	Implementing	Decided					Recm						
CPM062 & CPW160	Wholesaler MPS Charge Discontinuation	Ofwat Decision				A&P	Recm	Dec1						
CPW154	Interim Supply: Initial Cost Support	Post-Consultation						Recm	Dec2			Imp1		
CPW153	Interim Supply: Cost Recovery Mechanism	Post-Consultation						Recm	Dec2			Imp1		
CPM054.R1 & CPW145.R1	Deductions and Withholdings under Dispute Process	Post-Consultation						Recm				Dec1	Dec2	Imp2
CPW152	Post-RF Customer Refunds	Post-Consultation							Recm			Dec1	Dec2	Imp1
CPM058 & CPW149 'c1'	MPF Reform Part C - KPIs Phase 1	Design								Recm			Dec1	Imp1
CPM060 & CPW156	Customer and Third-party Access to Consumption Data	Design									Recm		Dec1	
CPM061 & CPW158	Data/Report requests of the Market Operator	Design		A&P								Recm		Dec1
CPM058 & CPW149 'c2'	MPF Reform Part C - KPIs Phase 2	Design												
CPM058 & CPW149	Market Performance Framework Reform	Design												
CPW157	CMOS Data Retention Beyond Seven Years	Design				A&P								Recm
CPW155	Data Quality Assurance Flags	Design								Recm			Dec1	
CPW161	Third Party Requests to Wholesalers	Pending A&P					A&P						Recm	
CPW159	Estimated Transfer Reads	Pending A&P					A&P							
CPW162	Cyclic Read Skip Codes	Pending A&P					A&P					Recm		
PIP211	Clarifying Deferral Rules	Pipeline									A&P			Recm
PIP192	Sharing Granular Consumption Data	Pipeline								A&P				
PIP239	Market Entry Assurance	Pipeline												

The following table forecasts when code changes are expected to be presented to the Code Change Committee. Changes with references beginning with PIP are pipeline changes that have yet to be formally proposed and pass the Initial Acceptance Criteria (IAC). These may be withdrawn or re-scheduled, and the dates below are MOSL’s current estimates for when they will be presented to the CCC. Changes with references beginning CPM or CPW have been assessed by the Market Operator as passing the IAC and have either been presented to the CCC or will be following further analysis.

Change Title	Reference	Status	CCC Meeting Date	Purpose
Cyclic Read Skip Codes	CPW162	Pending A&PC	08/04/25	Acceptance and Prioritisation
Estimated Transfer Reads	CPW159	Pending A&PC	08/04/25	Acceptance and Prioritisation
Third Party Requests to Wholesalers	CPW161	Pending A&PC	08/04/25	Acceptance and Prioritisation
Bilateral Hub	CPM051 & CPW139	Implementing	13/05/25	Recommendation
Deductions and Withholdings under Dispute Process	CPM054.R1 & CPW145.R1	Post-Consultation	13/05/25	Recommendation
Interim Supply: Cost Recovery Mechanism	CPW153	Post-Consultation	13/05/25	Recommendation
Interim Supply: Initial Cost Support	CPW154	Post-Consultation	13/05/25	Recommendation
Post-RF Customer Refunds	CPW152	Post-Consultation	10/06/25	Recommendation
Data Quality Assurance Flags	CPW155	Design	08/07/25	Recommendation
MPF Reform Part C - KPIs Phase 1	CPM058 & CPW149 'c1'	Design	08/07/25	Recommendation
Sharing Granular Consumption Data	PIP192	Pipeline	08/07/25	Acceptance and Prioritisation
Cyclic Read Skip Codes	CPW162	Pending A&PC	05/08/25	Recommendation
Customer and Third-party Access to Consumption Data	CPM060 & CPW156	Design	12/08/25	Recommendation
Clarifying Deferral Rules	PIP211	Pipeline	13/08/25	Acceptance and Prioritisation
Data/Report requests of the Market Operator	CPM061 & CPW158	Design	17/09/25	Recommendation
Third Party Requests to Wholesalers	CPW161	Pending A&PC	17/09/25	Recommendation
Clarifying Deferral Rules	PIP211	Pipeline	11/11/25	Recommendation
CMOS Data Retention Beyond Seven Years	CPW157	Design	14/11/25	Recommendation
Estimated Transfer Reads	CPW159	Pending A&PC	09/12/25	Recommendation
Market Performance Framework Reform	CPM058 & CPW149	Design	13/01/26	Recommendation
MPF Reform Part C - KPIs Phase 2	CPM058 & CPW149 'c2'	Design	13/01/26	Recommendation
Sharing Granular Consumption Data	PIP192	Pipeline	13/01/26	Recommendation

Since the last Code Change Committee meeting:

- Bilateral Hub (CPM051 & CPW139): The change proposal closure report for the bilateral programme has been delayed due to changes to the implementation dates of the final phase (CPW139i)
- Standardising the Definition of Sensitive Customer (PIP216): This has been placed on hold as the proposer is currently unable to confirm when it will be raised.
- Interim Supply: Customer Data Enduring (PIP184): Following the presentation of the Interim Supply: Customer Data Provisions (CPW137) [PIR](#) to the March CCC, it was agreed not to progress a systems solution at this time and this has been withdrawn.
- Estimated Transfer Reads (CPW159): This will be presented to the April CCC to consider whether it should be accepted into the change process. If accepted, then a recommendation date will be agreed.
- The Disputes Committee has withdrawn support for Deductions and Withholdings under disputes process (CPM054 & CPW145). This change was raised under the old change process so the Code Change Committee will consider it for withdrawal at a future meeting.

7 Strategic Changes

The table below provides an overview of change proposals being delivered under the Strategic Panel's [roadmap to a flourishing market](#).

Theme	Action	Change	Accept	Recommend	Implement	Ref
Customer Engagement and Choice	O8: Interim Supply	Interim Supply: Customer Data Provisions	12/01/23	→ 07/06/23	→ 27/10/23	CPW137
		Interim Supply: Cost Recovery Mechanism	13/08/24	→ 13/05/25	→ 12/09/25	CPW153
		Interim Supply: Initial Cost Support	13/08/24	→ 13/05/25	→ 12/09/25	CPW154
	O2: Wholesaler Incentives	Data Cleanse Funding	23/11/22	→ 08/03/23	→ 22/05/23	CPM050
		BR-MeX	12/04/23	→ 11/02/25	→ 01/04/25	CPM052 & CPW140
	M1: Reformed MPF	Market Performance Framework Interim Improvements	12/07/23	→ 13/09/23	→ 18/12/23	CPW144
		MPF Reform - Governance	11/01/24	→ 09/04/24	→ 26/06/24	CPM058 & CPW149 (a)
		MPF Reform - Non-Financial Tools	11/01/24	→ 14/05/24	→ 21/11/24	CPM058 & CPW149 (b)
		MPF Reform Part C - KPIs Phase 1	11/01/24	→ 08/07/25	→ 31/10/25	CPM058 & CPW149 'c1'
		MPF Reform Part C - KPIs Phase 2	11/01/24	→ 13/01/26	→ 03/04/26	CPM058 & CPW149 'c2'
P3: Centralised data	Sharing Granular Consumption Data	08/07/25	→ 13/01/26	→ TBA	PIP192	
Accurate and Accessible Data	M1: Reformed MPF	Data Quality Assurance Flags	10/09/24	→ 08/07/25	→ 11/05/26	CPW155
		Mandatory Address Data Items		→	→ TBA	PIP203
	P2: Open Data	Customer and Third-party Access to Consumption Data	10/12/2024	→ 12/08/2025	→ 08/12/25	CPM060 & CPW156
		Customer and third party access to Bilaterals	08/04/2025	→ 17/09/2025	→ TBA	CPW161
		Data/Report requests of the Market Operator	16/01/25	→ 17/09/25	→ 08/12/25	CPM061 & CPW158
Processes, Capability and Economics	M4: Smart Settlement	Review settlement period length, time of use charging and forecasting accuracy		→	→	
	P5: Switching Provisions	Estimated Transfer Reads	08/04/25	→ 09/12/25	→ 07/12/26	CPW159

The following table provides the latest update on in-flight strategic roadmap changes.

Customer Engagement and Choice	
Interim Supply: Initial Cost Support (CPW154)	<p>CPW153 and CPW154 are the outputs of Ofwat’s consultation on strengthening customer protections when a retailer exits from the market. Further details can be found in Ofwat’s publication ‘Strengthening customer protections in the Business Retail Market: The Interim Supply Arrangements – our decision’</p> <p>This change seeks to assist retailers with additional costs incurred when onboarding customers due to an interim supply event. It will focus on areas where they may need support, such as additional wholesale charges and credit support requirements. Recommendation has been delayed until May 2025 to allow Ofwat time to assess and confirm the solution.</p>
Interim Supply: Cost Recovery Mechanism (CWP153)	<p>This change is seeking to assist retailers in recovering additional costs when onboarding customers due to an interim supply event. It will focus on the creation of a Cost Recovery Mechanism to enable interim retailers to recover the additional costs incurred in taking on customers of a failed retailer. Recommendation has been delayed until May 2025 to allow Ofwat time to assess and confirm the solution.</p>
BR-Mex (CPM052 & CPW140)	<p>Ofwat proposed this change in April 2023 to implement a business customer and retailer measure of experience as part of the PR24 methodology. This was recommended for approval at the February 2025 CCC meeting and approved by Ofwat to implement on 1 April 2025.</p>
Market Performance Framework Reform (CPM058 & CPW149)	<p>The overarching code change to deliver the MPF Reform was accepted at the January 2024 Code Change Committee. The programme will be delivered in the following phases:</p> <ul style="list-style-type: none"> • Governance (CPM058a & CPW149a) was implemented on 21 November 2024. • Non-Financial Tools (CPM058b & CPW149b) was implemented 21 November 2024. • MPF Reform Part C - KPIs Phase 1: This phase is expected to include the cyclical and transfer read metrics. A recommendation is expected to be presented at the July 2025 Code Change Committee meeting. • MPF Reform Part C - KPIs Phase 2: This phase is expected to include data and service level KPIs. A recommendation is expected to be presented at the January 2026 Code Change Committee meeting
Sharing Granular Consumption Data (PIP192)	<p>This code change was identified by the Metering Committee and arises from the Strategic Metering Review. It seeks to implement a smart meter data hub to standardise sharing of granular consumption data for use by retailers and settlement. The Strategic Panel expect to review the business case for this change in June 2025.</p>

Accurate and Accessible Data	
Data Quality Assurance Flags (CPW155)	This was accepted into the change process at the September 2024 Code Change Committee. A consultation has been completed and MOSL is developing a solution with advice from the data assurance working group. A new recommendation date was agreed at the March 2025 CCC to ensure the solution satisfies BR-Mex and MPF requirements. This will now be recommended at the July 2025 CCC meeting. If approved, this change would be implemented in May 2026.
Mandatory Address Data Items (PIP203)	This is a potential code change arising from the data assurance project to mandate certain address data items.
Customer and Third-Party Access to Consumption Data (CPM060 & CPW156)	arbnco proposed this code change to define new roles and purposes for third party access to central systems data. The change was accepted into the change process at the December 2024 CCC meeting and recommendation to Ofwat is expected by August 2025.
Third party requests to wholesalers (CPW161)	Demeter has proposed the codes recognise the role of third parties acting on behalf of customers and require wholesalers to engage with them on meter asset issues.
Customer and Third-Party Access to Bilaterals (PIP234)	If CPW161 is implemented a further change may be proposed enabling third parties to raise and track requests in the Bilateral Hub, e.g. to install data logging equipment on behalf of customers.
Data/Report requests of the Market Operator (CPM061 & CPW158)	MOSL has proposed a change to align the codes with legislation, clarify what data can be released and to which public bodies. The change was accepted by the CCC at its January 2025 meeting and recommendation to Ofwat is expected by September 2025.

Processes, Capability and Economics	
Settlement Review	MOSL is reviewing the settlement process. This could consider shorter settlement periods and time of use tariffs to improve water efficiency, revised timescales for settlement runs, and more accurate forecasting possibly involving commercial incentives.
Review of estimated Transfer Read Conditions (CPW159)	The Metering Committee has proposed a change that seeks to clarify the circumstances in which an estimated transfer read can be used in place of an actual read. When a customer transfers retailer. This change will be presented to the April CCC for acceptance.

8 In Progress Code Changes

8.1 Initial Acceptance

The Market Operator has assessed the following [pipeline changes](#) against the Initial Acceptance Criteria (IAC). Changes that pass the Initial Acceptance Criteria are assigned a change reference beginning CPM and/or CPW and are then presented to the Code Change Committee for assessment against the Acceptance & Prioritisation Criteria. This may be at the next scheduled meeting or later if initial assessment to evidence the problem statement and case for change is needed. Changes that fail the IAC are rejected from the change process. The rationale for failing the criteria is published on the pipeline changes webpage.

Pipeline Reference	PIP088	PIP233	PIP224
Title	Estimated Transfer Reads	Third Party Requests to Wholesalers	Cyclic Read Skip Codes
CMOS Impact	N	N	Y
Bilaterals Hub Impact	N	N	N
IAC Assessment	Pass	Pass	Pass
IAC Date	19 December 2025	27 March 2025	27 March 2025
Change Reference	CPW159	CPW161	CPW162
Scheduled acceptance & prioritisation	April 2025	April 2025	April 2025
Description	Clarifies the circumstances in which an estimated transfer read can be used in place of an actual transfer read.	Requires wholesalers to respond directly to third parties making requests on behalf of customers e.g., to install a datalogger or disconnect a premises	Standard reasons for not providing an actual cyclic read collected in market systems

8.2 Acceptance and Prioritisation

The following change will be assessed for acceptance and prioritisation at the March Code Change Committee meeting. The Committee will be asked to confirm whether the change has failed the Initial Acceptance Criteria. If they consider it has passed, they will be asked to confirm whether it should be accepted into the change process.

Reference	CPW159	CPW161	CPW162
Title	Estimated Transfer Reads	Third Party Requests to Wholesalers	Cyclic Read Skip Codes
CMOS Impact	N	N	Y
Bilaterals Hub Impact	N	N	N
Group, Committee or MOSL	Committee	MOSL	MOSL
Engagement Type	Consultation	Consultation	Consultation
Expected Engagement	23 June – 11 July 2025	9 – 23 June 2025	May 2025
Proposed CCC Recommendation	9 December 2025	14 October 2025	17 September 2025
Provisional Ofwat Decision	9 March 2026	13 February 2026	17 December 2025
Provisional Implementation	8 May 2026	13 March 2026	December 2026

8.3 Code Change Committee Recommendation

There are no changes being recommended at the April Code Change Committee.

Title	
CMOS Impact	
Bilaterals Hub Impact	
Group, Committee or MOSL	
Implementation	

8.4 Amended Change Proposal Plans

There are no amended change plans to be presented to the committee in April.

Title	
CMOS Impact	
Bilaterals Hub Impact	
Group, Committee or MOSL	
Update	
Expected Consultation	
Current CCC Recommendation	
Proposed CCC Recommendation	
Provisional Implementation	

8.5 Accepted Change Proposals on Hold

There are currently no change proposals accepted into the change process that are on hold.

Title	
CMOS Impact	
Bilaterals Hub Impact	
Group, Committee or MOSL	
Update	

8.6 In Design

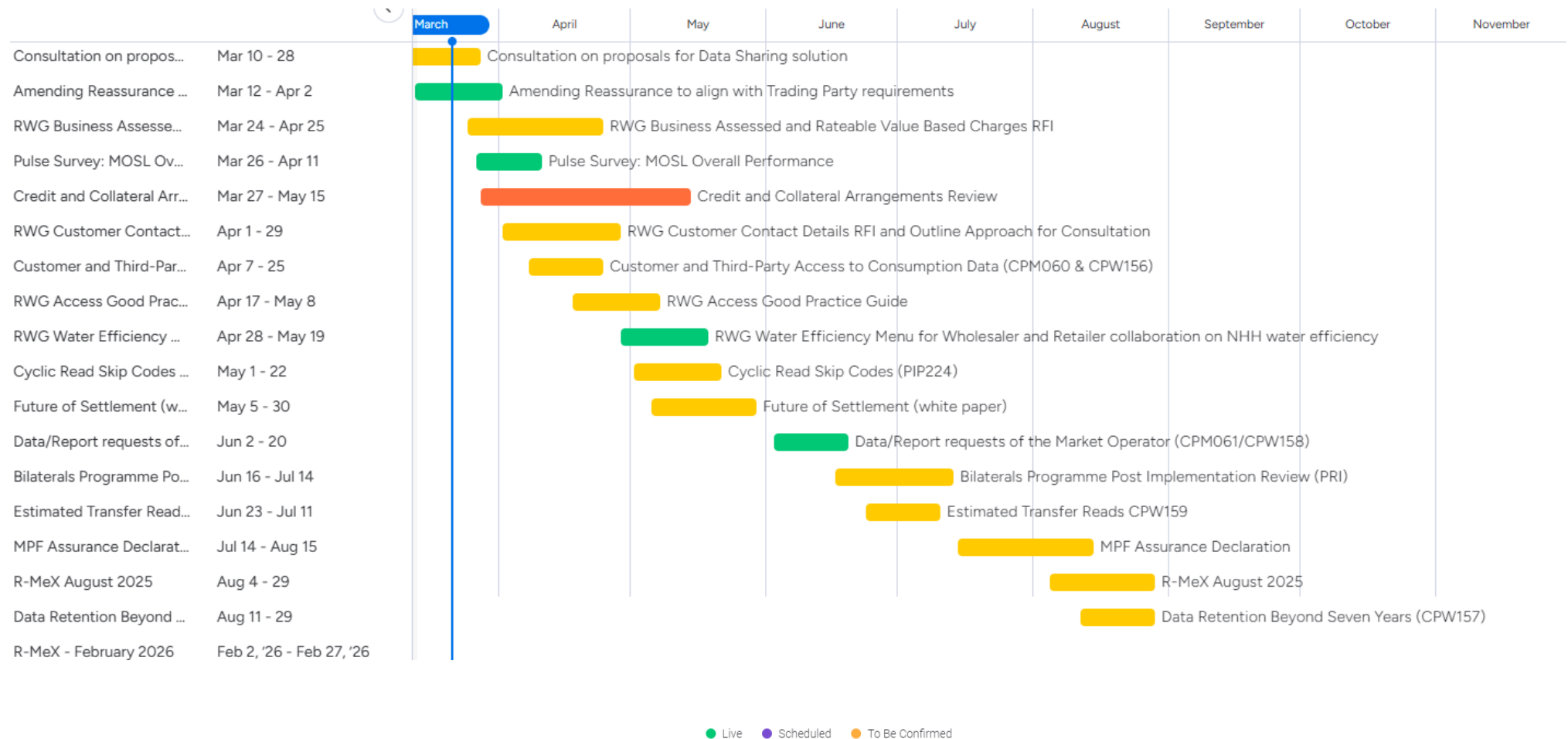
The following table lists change proposals that have been accepted into the change process by the Code Change Committee and updates on progress since the last report.

Change Title	Market System Impact	Group, Committee or MOSL	Forecast CCC Recommendation Date	Update
Market Performance Framework Reform (CPM058 & CPW149)	TBA	PAG, CAG	January 2026	See Section 9.2
Post-RF Customer Refunds (CPW152)	Code Only	Group	10 June 2025	MOSL is developing this change with a working group. A request for information was issued from 30 September to 25 October 2024. MOSL are currently working with the proposer and working group in reviewing the consultation responses.
Interim Supply: Cost Recovery Mechanism (CPW153) & Interim Supply: Initial Cost Support (CPW154)	Code only	Group	13 May 2025	Ofwat is developing these changes with MOSL and a working group. Following stakeholder feedback, the joint consultation was extended to 10 December 2025. To allow more time for solution design and confirmation both changes are now expected to be recommended in May 2025.
Deductions and Withholdings under Dispute Process (CPM054 & CPW145)	Code Only	MOSL	8 April 2025	This change was returned by Ofwat for further consideration. The CCC agreed how to progress this change at its October 2025 meeting. An amended solution has been developed and consulted on to address some of the concerns raised by Ofwat. Having reviewed consultation feedback the Disputes Committee has withdrawn its support for this change. As the change was proposed under the old change process the CCC will consider withdrawing it.
Data Quality Assurance Flags (CPW155)	CMOS	MOSL	8 July 2025	This was accepted into the change process at the September 2024 Code Change Committee. A consultation has been completed and MOSL is developing a solution with advice from the data assurance working group. A new recommendation date was agreed at the March 2025 CCC to ensure the solution satisfies BR-Mex and MPF requirements. A solution is expected to be recommended at the July 2025 CCC meeting. If approved, this change will now be implemented in May 2026.

Change Title	Market System Impact	Group, Committee or MOSL	Forecast CCC Recommendation Date	Update
Customer and Third-Party Access to Consumption Data (CPM060 & CPW156)	TBC	MOSL	12 August 2025	This was accepted into the change process at the December 2024 CCC meeting. MOSL is working with the proposer to develop a solution and expects to recommend a solution in August 2025.
Data/Report Release to Public Bodies (CPM061 & CPW158)	Code Only	MOSL	17 September 2025	This was accepted into the change process at the January CCC meeting. MOSL expects to recommend a solution in September 2025
CMOS Data Retention Beyond Seven Years (CPW157)	TBC	MOSL	14 November 2025	At the March CCC meeting it was agreed to take this change off hold and a new change plan was agreed. MOSL are now working with the proposer and expected to recommend a solution in November 2025.

8.7 Stakeholder Engagement

The following chart shows MOSL’s forecast of forthcoming stakeholder engagement associated with improvement work by MOSL, Strategic Panel, Ofwat, CCW and RWG. The dates of scheduled and to be confirmed engagements may change. Items with CPM or CPW in brackets are accepted code changes. Items with PIP in brackets are pipeline code changes which may or may not lead to a code change. This information is also available on the [Market Request Calendar](#) on the MOSL website.



8.8 Awaiting Ofwat Decision

The following table lists change proposals that the Code Change Committee have recommended to Ofwat.

Change Title	Market System Impact	CCC Recommendation	Anticipated Ofwat Decision	Implementation
Wholesaler MPS Charges (CPM062 & CPW160)	Code Only	Early Rejection	12 May 2025	N/A

8.9 Ofwat Decisions

Two Ofwat decisions have been published since the last report.

Change Title	Market System Impact	CCC Recommendation	Ofwat Decision	Ofwat Decision Date	Implementation
BR-Mex (CPM052 & CPW140)	Code Only	Unanimous Recommendation	Approved	13 March 2025	1 April 2025
Bilaterals Hub additional enhancements part 4 (CPW139i)	Bilaterals Hub	Majority Recommendation	Approved	25 March 2025 (Amendment)	16 December 2025

8.10 Implementing

One change is currently awaiting implementation.

Change Title	Market System Impact	Ofwat Decision Date	Implementation
Bilateral Hub - Additional enhancements pt4 (CPW139i)	Bilateral Hub	25 March 2025	16 December 2025
BR-Mex (CPM052 & CPW140)	Code Only	13 March 2025	1 April 2025

8.11 Implemented

No changes have been implemented since the last report.

Change Title	Market System Impact	Ofwat Decision Date	Implementation

8.12 Post Implementation Reviews

The following approved or implemented changes are scheduled to be reviewed by the Code Change Committee.

Change Title	Implementation Date	CCC Meeting Date
Change Process Improvements (CPM053)	18 December 2023	8 April 2025
Market Performance Framework Interim Improvements (CPW144)	18 December 2023	10 June 2025
Clarifying Meter Chamber Responsibilities (CPW141b)	16 February 2024	8 July 2025
Wholesaler Maintenance of YVEs for NMMs (CPW143)	10 May 2024	12 August 2025
Bilateral Hub - Additional enhancements pt2 (CPW130g)	2 October 2024	9 December 2025
Resource Support to industry groups (CPM056)	4 April 2024	TBA
Transfer Read Notifications for Outgoing Retailers (CPW148)	6 December 2024	TBA

8.13 Non-Code Draft Change Proposals

The following table lists CMOS changes without associated MAC or WRC changes. This information is also on the [MOSL website](#).

Non-Code Reference	Proposer	Title	CMOS Impact	Status	Description	Forecast Release	Cost
NCC034	United Utilities	Allow wholesalers to set up permission roles for the TCORR115.W transaction at a lower level of detail	Yes	Implementing	Enable within user roles, the use of TCORR115.W for the SPERR code or all codes (Data item D2025). For LVI use.	CMOS R17.0 9 May 2025	£9,847
NCC035	MOSL	Tariffs uploads via CSV	Yes	Implementing	Seeks to allow trading parties the option to upload tariffs for the annual tariff window or ad-hoc window, using the .csv format.	CMOS R17.0 9 May 2025	£44,950
NCC036	MOSL	Modernisation of Systems – CMOS rejected transactions	Yes	Implementing	This change is looking at changing the screen when a transaction is rejected via LVI, keeping the screen with the data inputted.	CMOS R17.0 9 May 2025	£37,630
NCC037	MOSL on behalf of RWG	Future Effective From Dates T145.W/T163.W	Yes	Analysis	The proposal seeks to allow Wholesalers to send to CMOS T145.W and T163.W transactions with future effective from dates. This includes their respective TCORR versions (which would require both future effective from dates and effective to dates).	TBC	TBC
NCC038	United Utilities	Ability to bulk delete unauthorised future dated tariffs	Yes	Analysis	Ability for wholesalers to be able to delete tariffs in bulk that have been uploaded as part of yearly upload and need to be amended	TBC	TBC

Non-Code Reference	Proposer	Title	CMOS Impact	Status	Description	Forecast Release	Cost
NCC039	MOSL	Modernisation of Systems – CMOS rejected transactions – stage 2	Yes	Implementing	This change is following the initial NCC036, looking at changing the screen for the remaining transactions in CMOS, when a transaction is rejected via LVI, keeping the screen with the data inputted.	CMOS 17.5 22 August 2025	£61,540

9 Releases

The following table shows planned releases. Releases coloured in orange are CMOS and/or Bilateral Hub system releases with or without associated code changes. Releases in green are code changes that do not affect central systems.

Release	1 Apr 25	12 May 25	25 Aug 25	12 Sep 25	10 Oct 25	14 Nov 25	8 Dec 25	16 Dec 25	15 Apr 26	11 May 26
Type	Code Only	CMOS R17.0	CMOS R17.5	Code Only	Code Only	Code Only	CMOS R18.0	CPW139i Bilats ph15	Code Only	CMOS R19.0
Gate Closure for System Approval	N/A	14 Nov 24	27 Feb 25	N/A	N/A	N/A	12 Jun 25	CLOSED	N/A	13 Nov 25
CMOS Cost of candidate release	N/A	£102,254	£61,540	N/A	N/A	N/A	TBC	N/A	N/A	TBC
Release Status	CLOSED	CLOSED	CLOSED	OPEN	OPEN	OPEN	OPEN	CLOSED	OPEN	OPEN

Central Systems implementation is often over a weekend and completed before the start of a business day. During system implementation the system is locked so Trading Parties are unable to submit transactions until implementation is complete. The dates above are when market code changes come into effect. This is usually from midnight before the following business day such that system implementation and code changes are both complete before the start of the same business day.

'Gate Closure for System Approval' is when Ofwat needs to approve system affecting changes by, for inclusion in that release. Candidate release costs are subject to change and finalised in commercial agreements between MOSL and its service provider.

9.1 Release Scope and Breakdown

Further details of the changes in each release and their costs are below. Programme costs for the Bilateral Hub and Market Performance Framework reform are shown separately at the end. Only changes that have passed the Acceptance and Prioritisation criteria are included. Changes may have the following costs:

Assessment – Cost to develop a change proposal for recommendation to Ofwat, which includes estimated MOSL and industry resources to develop the change proposal.

Implementation – Cost to implement a change, other than central system changes and business as usual activity updating and maintaining the codes. This cost is subject to Ofwat approving the change.

Central Systems – Forecast the cost of impact assessments and implementing a change into central systems (CMOS or Bilateral Hub). This cost is subject to Ofwat approving the change. Consequential changes to market participant systems are not included.

1 April 2025 (Code Only)								
Title	Code Impact	CMOS Impact	Bilateral Hub Impact	Status	Assessment	Implementation	Central Systems	Total
BR-MeX (CPM052 & CPW140)	Y	N	N	Implementing	£100,000	£150,000	£0	£250,000

12 May 2025 (CMOS)								
Title	Code Impact	CMOS Impact	Bilateral Hub Impact	Status	Assessment	Implementation	Central Systems	Total
Allow wholesalers to set up permission roles for the TCORR115.W transaction at a lower level of detail (NCC034)	N	Y	N	Implementing	£0	£0	£102,254	£102,254
Tariffs uploads via CSV (NCC035)	N	Y	N	Implementing	£0	£0		
Modernisation of Systems – CMOS rejected transactions (NCC036)	N	Y	N	Implementing	£0	£0		

25 August 2025 (CMOS)								
Title	Code Impact	CMOS Impact	Bilateral Hub Impact	Status	Assessment	Implementation	Central Systems	Total
Modernisation of Systems – CMOS rejected transactions – stage 2 (NCC039)	N	Y	N	Implementing	TBC	TBC	£61,540	£61,540

12 September 2025 (Code Only)								
Title	Code Impact	CMOS Impact	Bilateral Hub Impact	Status	Assessment	Implementation	Central Systems	Total
Interim Supply: Cost Recovery Mechanism (CPW153)	Y	N	N	Design	TBC	TBC	N/A	TBC
Interim Supply: Initial Cost Support (CPW154)	Y	N	N	Design	TBC	TBC	N/A	TBC

10 October 2025 (Code Only)								
Title	Code Impact	CMOS Impact	Bilateral Hub Impact	Status	Assessment	Implementation	Central Systems	Total
Deductions and Withholdings under Dispute Process (CPM054 & CPW145)	Y	N	N	Pending Withdrawal	TBC	TBC	N/A	TBC

14 November 2025 (Code Only)								
Title	Code Impact	CMOS Impact	Bilateral Hub Impact	Status	Assessment	Implementation	Central Systems	Total
Post RF-Refunds (CPW152)	Y	N	N	Design	TBC	TBC	N/A	TBC

8 December 2025 (CMOS)								
Title	Code Impact	CMOS Impact	Bilateral Hub Impact	Status	Assessment	Implementation	Central Systems	Total
Customer and Third-Party Access to Consumption Data (CPM060 & CPW156)	Y	TBC	N	Design	TBC	TBC	TBC	TBC
Data/Report Release to Public Bodies (CPM061 & CPW158)	Y	N	N	Design	TBC	TBC	TBC	TBC

15 April 2026 (Code Only)								
Title	Code Impact	CMOS Impact	Bilateral Hub Impact	Status	Assessment	Implementation	Central Systems	Total
CMOS Data Retention Beyond Seven Years	Y	TBC	N	Design	TBC	TBC	N/A	TBC

11 May 2026 (CMOS)								
Title	Code Impact	CMOS Impact	Bilateral Hub Impact	Status	Assessment	Implementation	Central Systems	Total
Data Assurance Flags (CPW155)	Y	Y	N	Design	TBC	TBC	TBC	TBC

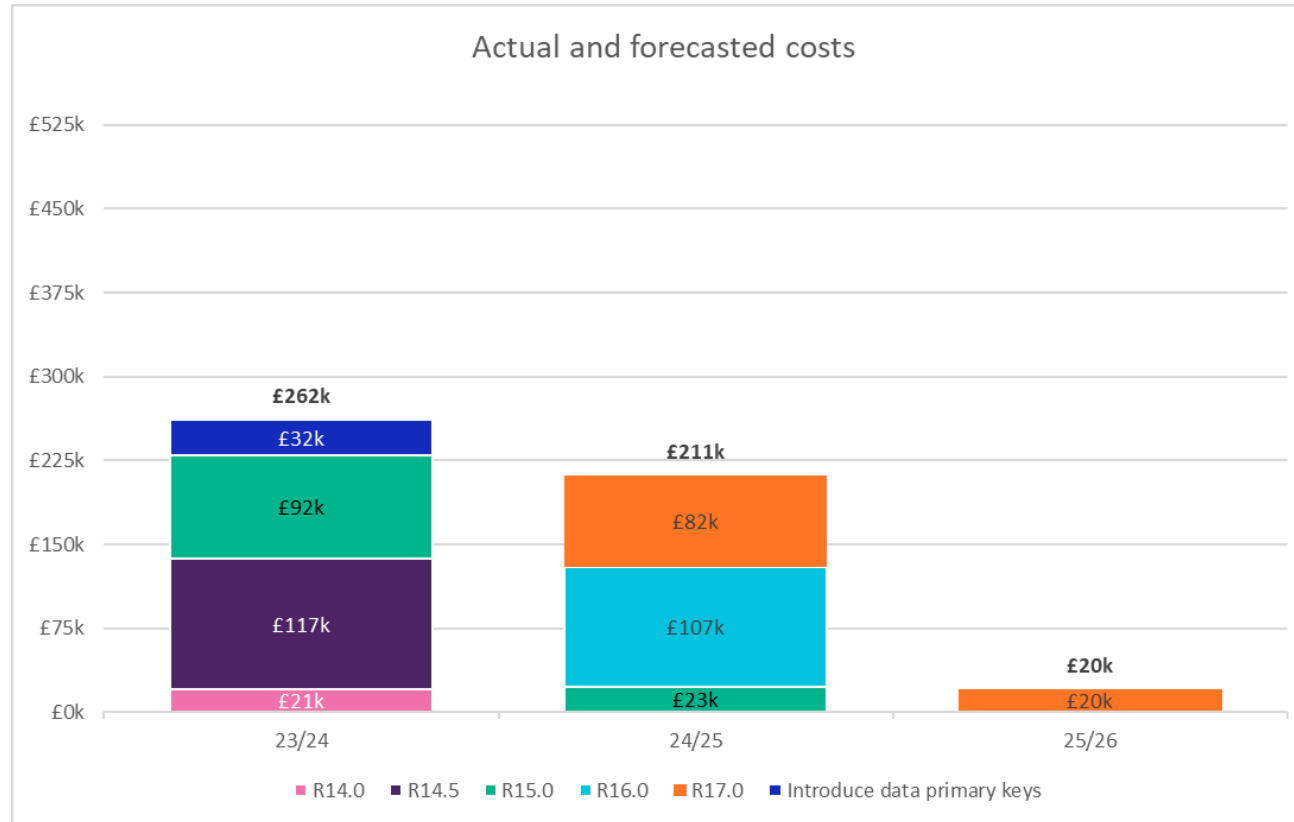
9.2 Programme Releases

Bilateral Hub				
	Code Impact	Central Systems Impact	Status	Budget
Title Bilateral Hub (CPM051 & CPW139)	Y	Y	CPW139a 'Allowances & Adjustments' – Implemented 20 June 2023	FY 2023/24 £825,664
	Y	Y	CPW139b 'Verifications' – Implemented 27 September 2023	
	Y	Y	CPW139c 'Dis/Re-connections' – Implemented 12 December 2023.	
	Y	Y	CPW139d 'Assessments' – Implemented 12 December 2023.	
	Y	Y	CPW139e 'Miscellaneous' – Implemented 13 March 2024.	
	Y	Y	CPW139f 'Accredited Entities', 'Planned and Unplanned Events' and 'Additional Enhancements pt1' – Implemented 26 June 2024.	FY 2024/25 £507,000
	Y	Y	CPW139g 'Additional enhancements pt2'– Implemented 2 October 2024.	
	Y	Y	CPW139h 'Additional enhancements pt3'– Implemented 13 December 2024.	
	Y	Y	CPW139i 'Additional enhancements pt4'– Approved by Ofwat and will be implemented in one tranche on 16 December 2025.	

Market Performance Framework Reform				
Title	Code Impact	Central Systems Impact	Status	Revised Budget
Market Performance Framework Reform (CPM058 & CPW149)	Y	N	CPM058 & CPW149 (a) 'Governance' - On 20 November 2024, the Strategic Panel confirmed the appointment of the PAC, and the final version of the code change was implemented on 21 November 2024	FY 2024/25
	Y	N	CPM058 & CPW149 (b) 'Tools Part 1' – Implemented 21 November 2024	£610,000
	Y	N	CPM058 & CPW149 (c) 'MPF Reform Part C - KPIs Phase 1' – Recommendation is expected July 2025 and, if approved, implemented November 2025	FY 2025/26
	Y	TBC	CPM058 & CPW149 (d) MPF Reform Part C - KPIs Phase 2' – Recommendation is expected January 2026 and, if approved, implemented 1 April 2026	£345,000

10 Forecast Change Expenditure

The diagram below shows the actual expenditure for assessing and implementing changes in financial periods 2023/24 to 2025/26. This expenditure is included in MOSL’s Business Plan.



R14.5 was deployed in November 2023 at a cost of £117k.

R15.0 was deployed in May 2024 at a cost of £115k, with 80% of the costs in financial year 2023/24 and the remaining 20% in 2024/25.

R16.0 was deployed in December 2024 at a cost of £107k.

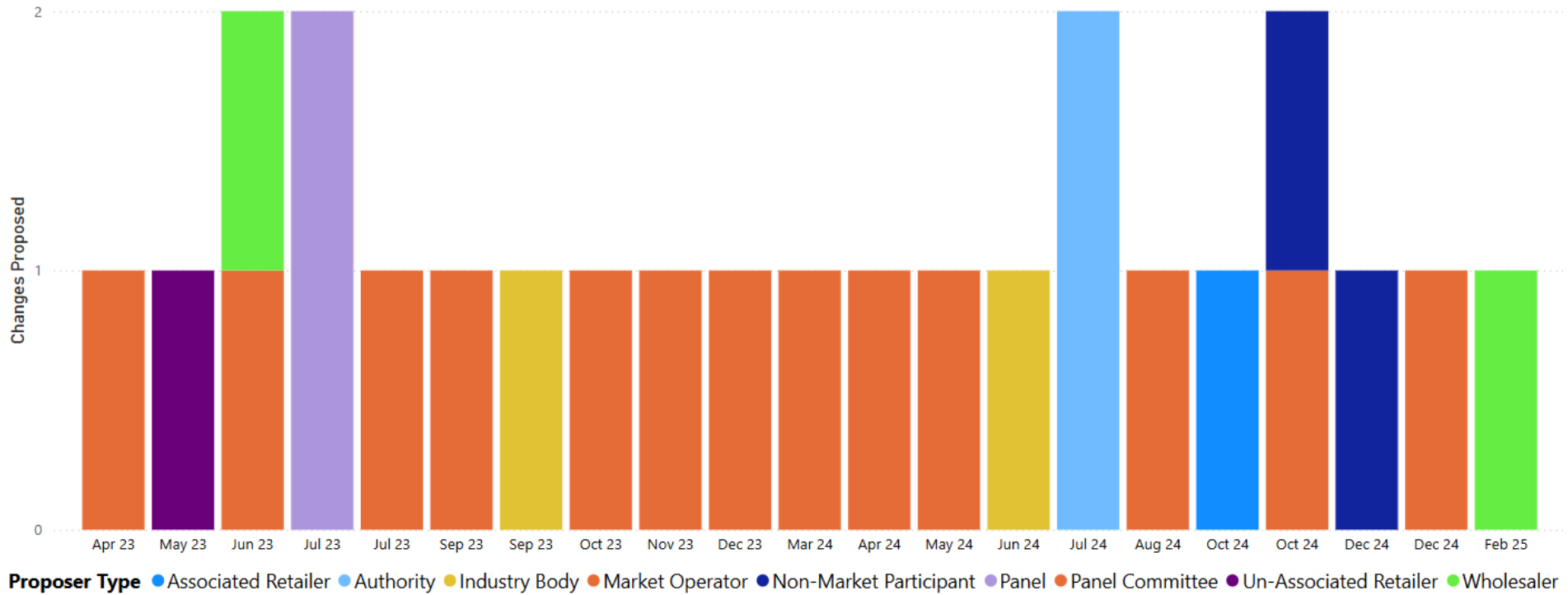
R17.0 is due to be deployed in May 2025 at a cost of £102k, with 80% of the costs expected in the financial year 2024/25 and the remaining 20% in 2025/26.

11 Trend Analysis

11.1 Source of change

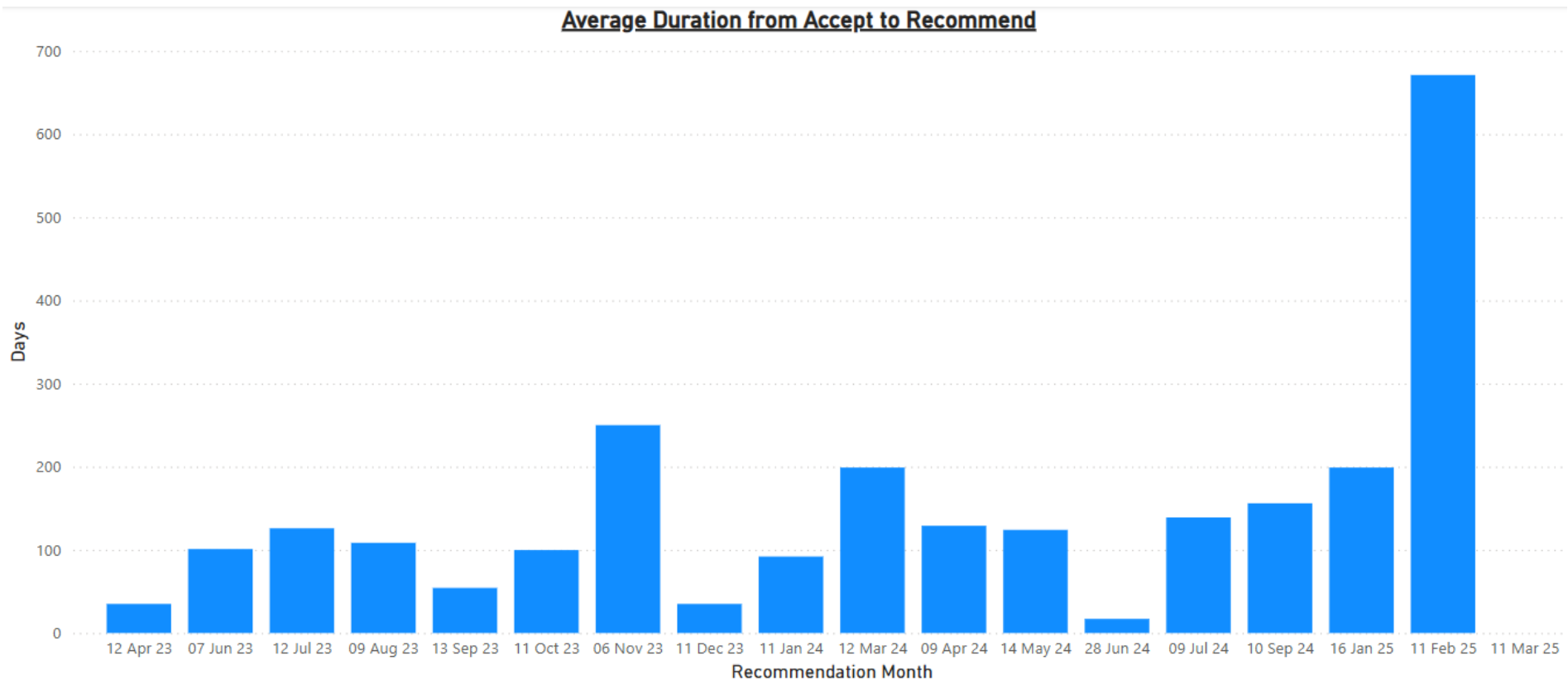
The following chart shows changes received, categorised by type of proposer.

Sources of Change



11.2 Duration of change

The following chart shows the duration between a change being accepted or considered for the first time by the Code Change Committee and its recommendation to Ofwat. Each column represents the average duration of changes categorised by the month that they were recommended. The longer duration in February 2025 was due to the BR-Mex change (CPM052 & CPW140). It was proposed by Ofwat in March 2023 but not recommended until February 2025 following publication of the PR24 final determination in December 2024.



The following chart shows the duration between a change being recommended by the Code Change Committee and implementation if approved by Ofwat. Each column represents the average duration of changes categorised by month of implementation. The longer duration in May 2024 coincides with the CMOS release that month.

