

Minutes of the Market Performance Committee Meeting 27

26th June 2019 | 10:00 – 15:30

Held at 1 America Square, 17 Crosswall, London, EC3N 2LS

Status of the Minutes: Final Document

Note: Some information has been redacted for the public domain

MEMBERS PRESENT

Nigel Sisman	NS	Independent Chair	Wendy Monk	WM	Retailer Committee Member
Mike Brindle	MB	Retailer Committee Member	Jesse Wright	HL	Wholesaler Committee Member
Claire Yeates	CY	Retailer Committee Member	Trevor Nelson	TN	Retailer Committee Member
Simon Bennett	SB	Wholesaler Committee Member	Andrew Lawson	AL	Alternate Wholesaler Committee Member
Martin Mavin	MM	Alternate Wholesaler Committee Member			

OTHER ATTENDEES

Darren Hayes	DH	Ofwat Observer	Georgina Mills	GM	Ofwat Observer
Steve Arthur	SA	MOSL Presenter	Liz D’Arcy	LD	MOSL Representative
Samantha Webb	SW	MOSL Presenter	Hannah Allardice	HA	MOSL Presenter
Milo Halford	MH	MOSL Presenter	David Seymour	DS	Observer, Thames Water
Luke Austin	LA	MOSL Presenter	Alexandra Piper	AP	MPC Secretary
Mark Crowley	MC	MOSL Presenter	Chris Chiorean	CC	MPC Secretary
Miles Robinson	MR	MOSL Presenter	Christina Blackwell	CB	CC Water Representative

APOLOGIES

Mike Rathbone	MR	Wholesaler Committee Member	Don Maher	DM	Wholesaler Committee Member
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1. Welcome and Approval of Minutes

Purpose: For Information

- 1.1. The Chair began by welcoming the members of the Market Performance Committee and introductions around the room.
- 1.2. The Chair gave the committee the outcome of the Panel voting on MPC membership. Gerard Lyden was voted onto the MPC as a wholesaler member starting from July 2019. Simon Bennett was thanked for his input to the MPC during his tenure.

2. Minutes and Outstanding Actions

Purpose: For Decision

- 2.1. The Chair went through the minutes and it was agreed that they were to be finalised as is.
- 2.2. The Chair noted that he had held a positive meeting with MOSL in preparation for this meeting and that progress had been made in the quality and timeliness of MPC admin and secretarial work. The Chair requested the same standard going forward.
- 2.3. MOSL went through outstanding actions and highlighted which were to be closed. No comments from the MPC and proposed actions closed.
- 2.4. The Chair suggested that A26_01 did not necessarily capture the entirety of what was requested regarding MPC's role in the action. The Chair suggested the MPC should also look at OPS and give feedback, raising any points that need to be discussed, and suggested feedback should be collected from Trading Parties.

3. MPS, OPS and APIs

Purpose: For Discussion

- 3.1. MOSL provided an update on the discovery of an error in the calculation of MPS18 and MPS19 in the month of May 2019 data which resulted in charges against those standards charged to the wrong TPs. MOSL would inform all affected parties on 27th June 2019. MPS charges would be re-run and affected trading parties would receive revised invoices. Any charts are to be re-published by MOSL.
- 3.2. MOSL presented the OPS Dashboard to members. It was produced as a result of a previous action requesting a collation of the OPS data which would be available to MPC members. MOSL showed MPC members how the dashboard could be used and explained that it allowed access to all the data MOSL had under OPS. MPC members had been invited to use it and advise MOSL if they noticed any errors.
- 3.3. MOSL identified a significant issue regarding inaccuracies in the OPS data reported by most TPs. The submission process for OPS data was discussed, and possible solutions to this issue were considered. Complete resubmission of affected data was considered but deemed impractical.

ACTION: MOSL agreed to verbally communicate with the TPs who produced the largest errors before the next reporting date (8th July 2019), and report back to MPC at the next meeting. PFM's to push TPs to act on



warnings seen on the OPS portal when submitting data. PfMs should tell TPs that MOSL will flag TPs with errors, and TPs may be asked to submit previous months' data. This will be an ad hoc allowance where MOSL will not charge for re-submitting data. MOSL agreed to update the MPC at the next meeting.

A27_01

- 3.4. Discussions were held over delaying the publishing of OPS data until the data was corrected. The Chair suggested that publishing should go ahead (after concerns over not publishing for two years), flagging the TPs with discrepancies.
- 3.5. A member identified that two TPs were reporting G4a and G4b incorrectly by reporting non-standard data as standard.

ACTION: MOSL agreed to chase up two TPs who were reporting G4a and G4b incorrectly.

A27_02

- 3.6. MOSL briefly introduced the MPS Dashboard which was confidential. The Chair argued the MPC should have transparency and share data in the public domain. MOSL argued that its current policy treated the data as confidential due to it allowing the calculation of the settlement value of a TP using its capped charge however, this could be reviewed. This matter was debated and the main concern was in respect of the visibility of this data for self-supply retailers.

ACTION: CY to discuss with self-suppliers whether they would accept their capped charges being in the public domain.

A27_03

4. Performance Resolution

Purpose: For Discussion

- 4.1. MOSL noted a lot of work has gone into the development of a monthly pack.
- 4.2. MOSL presented the latest updates on IPRPs to the MPC. 9 TPs were flagged and placed on a watch list.
- 4.3. 12 existing IPRPs were flagged and placed on a watch list for being more than 5% below their predicted milestones.
- 4.4. MOSL noted that there had been a significant dip in performance of Batch 1, due to it being populated by TPs who were underperforming and required extensions. 8 TPs were below their projected metrics. MOSL also noted that across all IPRPs, TPs have generally been drifting further away from their projected metrics (barring one spike which was believed to be due to missing data) but in general they were moving in the right direction in terms of MPS performance.

ACTION: MOSL to provide the MPC with information about why TPs were not on track in terms of IPRPs.

A27_04



ACTION: MOSL will provide a short summary of insight information prior to each MPC meeting. The MPC would also like to understand why some TPs who are not on track are not escalated in the information that MOSL agreed to start providing.

A27_05

- 4.5. In the future, MOSL would like to discuss replacing mean and median performance measures with thresholds. It is also exploring using moving averages instead of the month on month data which would create smoother metrics.
- 4.6. A member noted that several tasks in the OPS are not of high enough task volume to be subject to IPRPs. While not all OPS tasks are subject to this, it is still a point that must be considered.
- 4.7. MOSL noted that when initiating IPRPs, consideration should be given to events outside of a trading parties control. For example, a software provider had a bug recently that resulted in several retailers failing MPS15.
- 4.8. A member noted that their IPRP is discussed at board level and has attracted large internal attention, possibly even at the detriment of other internal matters. They emphasised that it is the 'soft' data, not the 'hard' data – these are sometimes multi-faceted issues and MOSL and MPC must get under the skin of the issue. The member argued that TPs are sometimes placed on an IPRP without MOSL understanding underlying performance issues.
- 4.9. A member stated they were pleased to see no parties were subject to more than 3 IPRPs. It was explained that this is likely due to the limited scope of IPRPs, such as not being applied on MPS 18. Members expressed their general satisfaction with the effectiveness of the process. Across the assessed standards which form IPRPs, the MPC acknowledged there were deficiencies in some TPs performance but overall there were no performers ready for escalation to MPC.
- 4.10. A member stated that creating the monthly reports explaining the performance against their IPRP is a large amount of effort on a trading party – they don't mind doing this, but they want to be sure MOSL is looking at and using these reports.
- 4.11. The Chair noted that MOSL must engage fully with the TPs and share insights MOSL has obtained through running the process (without divulging confidential/sensitive information). MOSL responded that this has been helpful when it has happened, such as with the software provider who suffered a bug.
- 4.12. The Chair stressed that warning of TP escalation would be helpful. This would ensure that MPC have a good understanding of issues before the MPC starts to look at more detailed chronology and evidence which in turn encourages rigour in MOSL's processes. MOSL clarified that there are currently no candidates for escalation and that they would give the MPC warning as soon as reasonably practical if possible. MOSL and the Chair recognised that this may not always be possible in urgent cases and will bring this forward immediately as and when required.
- 4.13. There was an open question relating to whether it would be worth doing a dummy escalation, but the Chair recalled that this was discussed before and that MPC had decided against.



5. Standard Pack

Purpose: For Discussion

- 5.1. MOSL revisited its proposed standard pack.
- 5.2. There was a discussion around the customer complaints slide and whether it was appropriate to look at it just in terms of a singular OPS task. It was agreed that CC Water would be in a better position to report the current state of customer complaints and that they would have a slot during a future MPC to discuss this issue and cover their report on customer insight.
- 5.3. MOSL suggested that Ofwat's CFI should be given a slot in July's MPC as it was missed out in May. The Chair agreed on the importance of this stressing that it is important that all relevant and necessary actions are identified and progressed if not covered by current MOSL or MPC activities.
- 5.4. A member inquired about what proportion of switching was repeat switching. MOSL responded they had not looked at it for a while but repeat switching was less than 10% during the last check. It was agreed that MOSL should produce more in-depth information, at least on a one-off basis, regarding switching, such as what proportion of customers switching are doing so for the first time, or which segment of the market is aware of the ability to switch and looking to switch. After being produced on a one-off basis MOSL should do additional regular reporting but only if it can be provided efficiently and if MOSL has the capacity to do so.
- 5.5. The Chair asked when the next release of league tables will be. MOSL responded that the fully external league tables will be biannual.
- 5.6. There was a discussion as to whether it would be good to include other measures in the league tables in some way. Members explored the desirability of "total task" and "total SPID" columns but after further discussion, it was decided not to make any changes that could overcomplicate the reporting.
- 5.7. MOSL gave a brief update of the progress made over the past month relating to the MPOP projects but clarified that several agenda items at the end of the meeting would cover them in more detail.
- 5.8. A member noted a defect in CMOS affecting the upload of meter reads. It only had a small effect on the TP in question. The possibility of other TPs being affected by this issue was briefly explored.
- 5.9. There was general agreement around the room that the pack represented an interesting amount of information and that they would be happy to see it monthly in a 15 minutes slot. MOSL asked for feedback from the MPC as to how much of it they liked and how often they would like to see it. A Member responded that at the very least they would be good as a placeholder for a short monthly slot. It was agreed that MOSL will come back with this slide pack for at least the next couple of months. At the start of the pack, they also agreed to add directional arrows (up/down) to the colour aspect (to assess whether the performance has improved or worsened since last time). Members felt the RAG rating of issues was helpful but needed parameters to explain the ratings.

6. Market Entry and Reassurance Update

Purpose: For Information



- 6.1. MOSL provided a brief update on the retailers who were engaged in the entry process. It was also noted that one trading party was going through reassurance, due to a middleware update, but was completed the previous day.
- 6.2. There was a discussion regarding a certain trading party and their application as a self supplier. Ofwat agreed to feedback progress on the self-supply licensing application.
- 6.3. There was a discussion amongst the MPC around how reassurance could be used as a performance improvement tool by exerting pressure on certain Trading Parties. There was some agreement around the room about the potential effectiveness of such a tool and how deeply it could probe into certain Trading Parties business processes.
- 6.4. There was a discussion around the room about the scope and necessary criteria to trigger reassurance. While it is currently mostly middleware issues, MOSL are looking into redefining the scope of the process.
- 6.5. There was desire expressed for a more targeted reassurance process, focussing on issues. The Chair clarified that this would be something that the MPC would indeed be interested in, but there was uncertainty as to how that stage would be reached.
- 6.6. The Chair and MPC members stressed that reassurance was a process that could be used by the MPC as a performance improvement tool.

ACTION: MOSL to look at reassurance tools and to come back to MPC with examples illustrating what a more targeted approach would look like in August 2019. MOSL to bring a considered opinion about how reassurance could be used by the MPC. This should include whether the toll might be used by MOSL, pre-escalation to MPC or only via MPC following escalation.

A27_06

- 6.7. A member stated that it would be useful if it were a case-study style piece of work with possible examples/scenarios etc. The Chair summarised that it is not clear what the possible outcomes of the process are, and this is an opportunity to enlighten the MPC.

7. MPS/OPS Project – Define next steps

Purpose: For Decision

- 7.1. The Chair gave an overview of Economic Insights' (EI) work on the MPS/OPS redistribution project.
- 7.2. EI is of the view where there should be a default position of full redistribution based off the CPM0008 + mechanics, but also for there to be an additional decision-making process to exercise the option to use some or all of the funds for other pre-defined pro-market activities.
- 7.3. The Chair clarified that the sub-group had found EIs reasoning economically and intellectually sound. The Chair also made note that a previous vote on what to do with OPS Charges in the MPC had ended 4 – 3 in favour of not directly redistributing. MPC will therefore have to assess that decision in the light of EIs recommendations and whether the two are consistent.



- 7.4. MOSL and the redistribution subgroup do have the current version of the report. EI will release their final version for the rest of the MPC to see shortly.
- 7.5. A member of the redistribution subgroup stated that they thought it should be possible to discuss the EI document and its recommendations at the July MPC, but it is 66 pages long and members should allow sufficient time to thoroughly read the document and to think carefully about the ideas and recommendations it makes.
- 7.6. A member stated that the report gave some excellent steers about what drives better behaviour in a clever but simple way. Legitimately fresh insight from a behavioural economics perspective should help MPC in its deliberations.
- 7.7. The Chair stated that while the report is largely pro-distribution, EI could not rule out the potential existence of activities that it would be appropriate to fund using the charges. Therefore, it may be necessary to look at the governance (including criteria and decision/approval process) as part of the consideration of a change proposal.
- 7.8. The MPC noted that the deadline to provide Ofwat with a recommendation is October 2019. The Chair stated that the MPC recommendation on what to do with the funds should be provided not later than the September 2019 Panel meeting if possible
- 7.9. EI will share the document with Ofwat prior to its finalisation. The Chair felt that EI would want to reflect on Ofwat's response but that it was unlikely substantial changes would be made before the document was finalised. An Ofwat observer clarified that Ofwat would be focused on the economics of the proposal.

8. MPOP – Programme B – APIs on LUM

Purpose: For Discussion

- 8.1. MOSL presented a section on the possibility of setting APIs for Long Unread Meters (LUMs) based on a paper released by MOSL that month.
- 8.2. MOSL highlighted three recommendations about APIs on LUM for the MPC to discuss.
 - (1) Add existing MPS measures related to cyclic meter reading into the IPRP process
 - (2) Add OPS measures into the remit of the IPRP process
 - (3) Assess further potential APIs to drive specific resolution of issues linked to long unread meters
- 8.3. MOSL recommended immediately implementing IPRPs for MPS 18, noting that the initial rationale for excluding MPS 18 from IPRPs no longer holds and that this would be an important first step to bring down the number of LUMs. MOSL noted that MPS 19 was not quite as straight forward and would only make a marginal impact on the number of LUMs. The first IPRPs would be considered for TPs in July based on Q1 2018/19 performance.
- 8.4. A member raised a concern that collaborative discussions with MOSL do not happen as much as they should. There was some discussion regarding the correlation between MPS 18 and LUMs. MOSL clarified that, in part, if Retailers were put on an IPRP for MPS 18, more insight could be gathered into the more



granular, TP-specific, issues relating to MPS 18 failure which, in turn, can feed into work on LUMs. It was noted that this issue was not just MPS 18 related and should indeed be of concern to Wholesalers. As the accountability for LUMs currently sits solely on Retailers, Wholesalers are not incentivised to act upon the LUMs. A member stated that the IPRPs could also be aimed at Wholesalers where they are responsible for MPS 18 fails by Retailers in their area. The Chair responded saying that could potentially happen but would be something further down the line. A member expressed concern over the liability for Retailers regarding missed reads, compared to that of a Wholesaler, or a previous Retailer who owned the LUM.

- 8.5. An observer raised a point that increased visibility on the reasons as to why a meter was not read would highlight where ownership of the problem lies. If the meter was unreadable or unserviceable, for example, and that would be conveyed to a Wholesaler, it would become their responsibility to deal with their asset.
- 8.1. The Chair noted that IPRPs should be used to explore the reasons for LUMs and/or poor MPS18 performance including charting what actions Retailers can take on their own account. The intelligence from plan development about wholesaler issues that retailers cannot resolve could then be considered as a trigger for developing APIs/IPRPs for Wholesalers. This recognises that both Wholesalers and Retailers have responsibilities to address the LUM situation.
- 8.2. Members expressed concern that talk of more IPRPs represented reputational risk for TPs. Hence the Chair suggested naming these interventions something other than IPRPs to avoid the reputational hit some TPs might incur. The Chair expressed the view that all reasonable efforts are made to deliver progress. TPs should expect wider Ofwat intervention if timely and acceptable progress is not delivered.
- 8.3. The Chair suggested that MOSL should pick out a small number of under-performing parties in this area as a starting point but perhaps based upon wider considerations than solely MPS18 performance. An MPC member stated that they felt that MPS 18 should not be used. If it were to be used, they expressed their view that it should not solely be MPS18, and that there should be cross reference to performance against LUM DIPs.
- 8.4. The Chair insisted that the focus should be on pushing forward. Whilst a leaning towards IPRPs for MPS 18 was evident, MOSL must be intelligent in their decision-making process.

ACTION: MOSL to look closely at MPS 18, outline possible candidates for IPRPs and make a plan of how to proceed. One Trading Party volunteered to share their data if MOSL would find it helpful.

A27_07

- 8.5. MOSL briefly ran through other recommendations, which it was agreed required more than a single discussion with the MPC to capture. The Committee concluded that MPS 18 should go forward with careful consideration on MOSL's behalf and that MOSL should look at something broader than MPS 18.

ACTION: MOSL to further develop the proposals regarding use of measures broader than MPS 18 and consider other factors which may play a part in the underperformance observed.

A27_08



- 8.6. The Chair suggested reaching out to those who unsuccessfully applied to join the MPC for help with these programmes.

9. MPOP Programme C – MPF Review (Quick Wins and MPF Roadmap)

Purpose: For Decision

- 9.1. MOSL highlighted the 3 strands of work: Redistribution of MPS/OPS, the Quick-wins Approach (short-term), and the Long-term Vision.
- 9.2. MOSL presented their paper on the Quick-wins Approach, focusing on MPS 13/18 and MPS 12/15. These are functionally identical Retailer (15/18 - Market Meter) and Wholesaler (12/13 - Non-Market Meter) standards.
- 9.3. MOSL highlighted the disincentive properties (in particular) of MPS 12/15 for meter read submissions. Currently, TPs are penalised for submitting meter reads late but crucially are not punished for not submitting meter reads at all. MOSL also noted the obvious link to other meter reading standards and the high levels of read rejection. MOSL concluded that the separation of MPS 12/15 from MPS 13/18 is no longer necessary and that 12 and 15 should be removed.
- 9.4. One MPC member listed a few options they considered which highlighted attempts to get data into the system.
- 9.5. MOSL pointed out that a structural feature of the proposed change meant that late read submissions may now take a TP over the SLA for MPS 18 and thus also recommended some amount of extension to MPS 18 SLA to accompany the discontinuation of MPS 15.
- 9.6. Ofwat inquired as to the impact of this on customers. A member clarified that if Retailers were not getting meter reads into their system to avoid incurring a cost, then they could be billed using estimates which could impact customer bills. It was, however, noted that the customer experience would not be greatly different if MPS 15 was dropped.
- 9.7. A member raised caution about removing MPS 16 and suggested that it may be more appropriate to consider the possibility of amending SLAs to be more fitting. For clarification, MPS 16 was not included on the report but was something that would also need to be investigated.
- 9.8. For MPS 13/18, MOSL proposed 3 options. Option 1: MOSL presented a slide proposing the increase of MPS 13/18 SLA from 140BD to 252BD (1 year). The reasons cited were the simplicity of calculation and omission of 'zero-charge' period.
- 9.9. The second option recommended a similar idea, with the difference being that the 252BD SLA is only applied after a meter read had been handed in. This meant that if a meter is read then it would not have to be read for another year, which would align with Ofwat's general perspective that meters should have at least one actual read per year to ensure accurate customer billing.
- 9.10. MOSL presented option 3, exploring the possibility of increasing the charge level in line with the time since the last meter read and assign a performance criterion. MOSL felt that this would be the simplest



way to work out the charge given to a TP. MOSL noted that option 3 was the most flexible to adapt but that option 3 was the largest change to the framework.

- 9.11. There was a discussion around the lengthy and substantial change to the structural properties of MPS 18 and whether this could be considered a quick-win anymore.
- 9.12. An observer asked if this would improve performance. A member responded that it should at the very least remove the disincentive properties of MPS 15 and that they were inclined to support the third option.
- 9.13. One MPC member believed that SLAs shouldn't be relaxed to align with an annual read. They emphasised that whilst the COP only requires one bill per year to be based on actual reads, there are other reasons for having as complete a read history as possible in CMOS.
- 9.14. The MPC did not come to an agreement. Some members preferred option 1 in the short term, perhaps exploring a transition to option 3 later when there was more structure in place.
- 9.15. The Chair clarified a need to separate the structural features and the parameters of the proposed changes.
- 9.16. There was strong agreement on the need to remove the disincentive elements of MPS 15. Retailers need a longer period to correctly validate re-reads and to not be disincentivised from submitting late reads.
- 9.17. The Chair clarified that there was a leaning towards accepting removal of MPS 15 but the structural MPS 18 proposition relating to reducing the total number of meter reads submitted required more discussion and analysis for the MPC to understand and make a fully formed decision.
- 9.18. A member stated that prioritising large meters would negatively impact the customer experience off customers with smaller meters when they encounter things such as leakage, leading to surprise bill inflation.
- 9.19. The Chair suggested moving on from this section and continuing the conversation offline, fuelled by some extra analysis on the part of MOSL.

ACTION: MOSL to facilitate a call with MPC members to further discuss the possible fast track changes, and to come back with detailed analysis on the 3 options for MPS 13/18 e.g. strengths and weaknesses. MOSL to circulate data prior to the call. All MPC members will be invited to the call but attendance will be optional.

A27_09

- 9.20. MOSL concluded the 'quick-wins' part of the presentation and progressed onto the 3-year MPF Roadmap which will begin with the establishment of an MPC working group. MOSL had an aim to share a clear outline for the 3-year MPF Roadmap with Ofwat by the end of the calendar year (2019). MOSL will engage with cross-industry experts (CCW, Ofwat, other Market Operators and regulators of other industries) in forming the MPF Roadmap, as well as employing a strategic consultant. MOSL plan to hold two visioning workshops on the MPF Roadmap.



- 9.21. MOSL addressed the issues around having every member of the MPC involved in the MPF Roadmap, warning against the underestimation of the logistical difficulties around accommodating all the varied opinions and perspectives.
- 9.22. The Chair raised concerns about getting through the July section of the Roadmap within the specified timeframe.
- 9.23. The Chair stated that he felt the charging cap must be reviewed as part of the April 2020 part of the section. He clarified that he did not necessarily mean it had to be scrapped, or even changed, but it must be reviewed at the very least.
- 9.24. The Chair requested clarification about the ownership of this project, between MOSL and the MPC. The Chair also mentioned that if the timeline was to be followed, such a decision should be made by the next MPC.
- 9.25. A member stated that they felt the MPF Roadmap should be MPC owned as they are the industry representatives. An Ofwat Observer noted the importance of factoring in the customer's voice to back up the legitimacy of the project.
- 9.26. It was noted that MOSL, now as the sponsoring organisation, must be included in the ownership decision and potentially take the lead. Cross-working between the MPC and MOSL was agreed by all to be crucial. MOSL acknowledged their responsibility due to the Roadmap's link with MPOP.
- 9.27. The Chair asked for a final clarification on who the sponsor of this project is. MOSL agreed to take that position.
- 9.28. MOSL asked the MPC whether there were concerns about MOSL ownership. The Chair responded that he was concerned with the credibility of the timeline presented (especially for the first few months). A member stated that regardless of ownership, success will depend on similar levels of MPC involvement and timelines etc. The MPC all agreed that MOSL will lead the MPF Roadmap.

10. Any Other Business

Purpose: For Discussion

- 10.1. There was a continuation of the earlier discussion as to whether it was appropriate to keep information on capped charges discrete or whether it should be outside of the firewall for transparency.

ACTION: MOSL to ask Panel whether capped charges should be considered sensitive information and not in the public domain, after MPC and MOSL have decided their positions on the matter. MOSL would like Panel's opinion before they consider any changes.

A27_10

- 10.2. An MPC member enquired as to when the redistribution of MPC Charges for the previous year would happen, to which MOSL answered that this should be completed by the end of July.
- 10.3. The meeting closed.



11. New Actions

A27_01 MOSL should verbally communicate with the Trading Parties who produced the largest errors before the next reporting date (8th July) and report back to MPC at the next meeting. Portfolio Managers to push TPs to act on warnings seen on CMOS when submitting data. PfMs should tell TPs that MOSL will flag TPs with errors, and TPs should re-submit previous months data. This is an ad hoc allowance where MOSL will not charge for re-submitting data. MOSL will update the MPC at the next meeting.

A27_02 MOSL to chase up two TPs who were reporting G4a and G4b incorrectly.

A27_03 An MPC member is to discuss with self-suppliers whether they would accept their capped charges being in the public domain.

A27_04 MOSL to provide the MPC with information about why TPs are not on track in terms of IPRPs.

A27_05 MOSL will provide a few sentences of information before going to each MPC meeting. The MPC would also like to understand why some TPs not on track are not escalated in the information that MOSL will provide.

A27_06 MOSL to look at reassurance tools and to come back to MPC with examples illustrating what a more targeted approach would look like in August 2019. MOSL to bring a considered opinion about how reassurance could be used by the MPC. This should include whether the toll might be used by MOSL, pre-escalation to MPC or only via MPC following escalation.

A27_07 MOSL to look closely at MPS 18, outline possible candidates for IPRPs and make a plan of how to proceed. One Trading Party volunteered to share their data if MOSL would find it helpful.

A27_08 MOSL to further develop the proposals regarding use of measures broader than MPS 18 and consider other factors which may play a part in the underperformance observed.

A27_09 MOSL to facilitate a call with MPC members to further discuss the above, MOSL to come back with detailed analysis on the 3 options for MPS 13/18 e.g. strengths and weaknesses. MOSL to facilitate a call with a subgroup of MPC members to further discuss and will circulate data prior to call. All MPC members will be invited to the call but attendance will be optional.

A27_10 MOSL to ask Panel whether capped charges should be considered sensitive information and not in public domain, after MPC and MOSL have decided their positions on the matter. MOSL would like Panel's opinion before they consider any changes.

The next MPC meeting is scheduled for 31 July 2019

Location: To be confirmed (London)