



# Minutes of the Market Performance Committee

## Meeting 36

1st April 2020 | 10:00 – 15:30

Held via Teleconference (Microsoft Teams)

Status of the Minutes: Final

### MEMBERS PRESENT

Elsa Wye	EW	Interim Chair	Wendy Monk	WM	Retailer Committee Member
Mike Brindle	MBr	Retailer Committee Member	Jesse Wright	JW	Wholesaler Committee Member
Claire Yeates	CY	Retailer Committee Member	Trevor Nelson	TN	Retailer Committee Member
Don Maher	DM	Wholesaler Committee Member	Gerard Lyden	GL	Wholesaler Committee Member
John Vinson	JV	Independent Supporting Chair	Mike Rathbone	MR	Retailer Committee Member

### OTHER ATTENDEES

Darren Hayes	DH	Ofwat Presenter	Pam Nash	PN	MOSL Representative
Steve Arthur	SA	MOSL Representative	Markus Lloyd	ML	MOSL Presenter
Samantha Webb	SW	MOSL Presenter	Pamela Taylor	PT	Independent Panel Member
Milo Halford	MH	MOSL Representative	Rob Curry	RC	MOSL Presenter
Luke Austin	LA	MOSL Presenter	Alexandra Piper	AP	MPC Secretary
Lisa Connell	LC	MOSL Representative	Chris Chiorean	CC	MPC Secretary
Andrew Howorth	AH	MOSL Representative	Adam Boynes	AB	CC Water Presenter
Liz D'Arcy	LD	MOSL Representative	Michelle Burns	MBu	Water Plus Representative
Jill Thorpe	JT	Water Plus Representative	Michele Marchall	MM	Water Plus Representative

### APOLOGIES

Georgina Mills	GM	Ofwat Presenter			
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## 1. Welcome and Introductions

### **Purpose: For Information**

- 1.1. The Chair began by welcoming the members of the Market Performance Committee and introducing attendees in the teleconference.

## 2. Minutes and Outstanding Actions

### **Purpose: For Decision**

- 2.1. The Chair asked if there were any comments on or amendments to the minutes of the last MPC.
- 2.2. One MPC member requested that section 10.2 be removed from the public minutes.
- 2.3. An Ofwat Representative requested a minor amendment to section 3.4, changing the wording to "Peel have exited the market by consent following a commercial decision to no longer operate".
- 2.4. One MPC member had emailed to suggest wording changes to section 10.6 relating to RMEX and MPC's role in finalising the survey questions.
- 2.5. Subject to these changes, the MPC approved the minutes of MPC 35.
- 2.6. The MPC reviewed outstanding actions, with a focus on actions due for completion or that had overrun.
- 2.7. Regarding action A30\_07, MOSL concluded that an analysis of estimated reads being entered as actuals in CMOS cannot be taken further at this stage but as data quality improves this may be available later on. One MPC member noted that it would be sensible in this context to track the increase in vacant properties due to COVID-19, to which MOSL agreed.
- 2.8. MOSL gave an update on looking at options for the audit following the agreement of members to remove the placeholder precision review. One MPC member asked for more information as to the currently favoured options. A MOSL representative suggested that it would be useful to recommence the Panel audit sub-committee to discuss the relevant issues. An MPC member suggested that MOSL should track any delays to the Audit due to COVID-19, to which MOSL agreed.

### **ACTION: MOSL to track any delays to the Audit due to COVID-19.**

**A36\_01**

- 2.9. Regarding action 35\_01, An MPC member commented on the exclusion of G4 standards within OPS reporting and noted that there should be a discussion around whether this is the correct standard approach for the MPC, and that it should be considered whether a standard should be excluded just because it results in very high performance. One MOSL representative noted that the issue with G4 is not the high performance but rather the ease of completing one such task, which would make it inadequate to compare with other standards. The MPC member responded that since the MPC agreed and the Code stipulated that this should be a standard, then greater consideration should be given to the removal of a standard from reporting. Another MPC member suggested that this question



be addressed to the industry within the R-MeX. It was suggested and ultimately agreed that G4 would be picked up as part of the OPS discussions under MPF Roadmap.

- 2.10. Regarding action 35\_05, the Chair stated that further to a discussion with John Gilbert, the Operational Advisory Group (OAG) would be the best way for MPC input to reach the Bilaterals project. It was suggested that JW and Jon Fuller join the OAG in June. MOSL confirmed that Bilaterals is proceeding as normal for now and was not expected at this stage to be delayed or reprioritised.

### 3. Ofwat Update

**Purpose: For Information**

- 3.1. Ofwat gave an update on their actions to reduce the impact of COVID-19 on the market.
- 3.2. The Ofwat presenter noted the interim solutions taken, including the suspension of MPS/OPS Charges, the direction to mark premises as vacant in the case of non-payment, and changes to settlement.
- 3.3. The Ofwat presenter mentioned that he had hoped to discuss the outputs of the RISE initiative during this meeting, but the publication was not put in the public domain as of yet.
- 3.4. One MPC member asked whether the Water Efficiency plan would be going ahead or de-prioritised. The Ofwat presenter agreed to find out and inform the MPC member later on.
- 3.5. One MPC member asked whether there has been any consideration to pausing switching during the COVID-19 crisis, due to the difficulty of getting meter reads and questionable estimates. The Ofwat presenter answered that it has been discussed but as far as he is aware, there was no decision around that idea. He agreed to provide an update when any developments occur. Another MPC member stated that he supported customers retaining an option to switch during the COVID-19 restriction period.

### 4. CC Water Update

**Purpose: For Information**

- 4.1. The CC Water representative gave an update on the position of complaints for this financial year. He noted that we are on course to finish the year with the first continued decrease in complaints since market opening, with preliminary figures showing a 17% decrease in complaints compared to the previous year, indicating an emerging improvement in market processes. He explained that about 75% of all complaints are around billing & charges. Within that, the biggest component is disputes over liability (such as leak allowances).
- 4.2. The CC Water presenter noted that second category, administrative complaints (mostly regarding Retailer duties), makes up around 10% of all complaints and this is largely where the decrease in complaints can be found.
- 4.3. The CC Water representative gave an update on the customer survey planned around the Testing the Waters research. They had selected a company to conduct the survey but due to COVID-19 they have decided to review the situation in two months, and possibly postpone the survey until next year.



- 4.4. A MOSL representative asked whether CC Water is reporting on complaints and customer issues in relation to the current COVID-19 crisis. The CC Water presenter noted that CC Water are very supportive of measures taken by Ofwat to tackle the COVID-19 crisis and have worked hard to respond to requests for input. He explained that they have a section on their website (Business Customer Hub) where customers can note the challenges they face around the COVID-19 crisis and provide feedback on what can be improved. They have also created a COVID-centered blog to provide advice to customers.
- 4.5. He noted that CC Water has not seen an increase in the number of complaints due to COVID, but he would expect these to come in later in the year, probably around estimated reads being submitted during the crisis.
- 4.6. An Ofwat Representative asked that around Testing the Water, would CC Water be amending the questions to pick up the impacts of COVID-19. The CC Water presenter answered that this is something that they are considering but no formal decision has yet been made. CC Water stated that they would be happy to give monthly updates if a slot was agreed.

## 5. COVID-19 Update and Discussion

### **Purpose: For Information**

- 5.1. The Chair noted that in this section she would give an update on COVID-19 and the actions they are taking, but that she would welcome input from all MPC members as to the impact on individual businesses from the current crisis. A draft statement for release to the market was shared before the meeting and comments on that would be appreciated, with a view to send the statement later in the week.
- 5.2. A MOSL presenter gave an update on MOSL's operations and priorities. With the MOSL CEO currently sick, the SLT has had regular meetings to ensure all operations run smoothly, and has noted that BAU is currently running according to plan. He flagged three areas in terms of workstreams: the Annual Report, the MPOP, and R-MeX. The decision around the Annual Market Performance Report (AMPR) is to continue as planned due to the importance of looking at the past year for improvements but in a lower key manner. MPOP will be re-focused to look at the impact of this crisis during the next 6 months and as such will be amended, with a view to later extend it for the next financial year. Regarding R-MeX, the view has been to defer it until later in the year, as it would not be appropriate to conduct the survey now considering the challenges faced by Retailers and the rest of the market. One MPC member noted that as the R-MeX was planned around feeding into the AMPR, with the deferral of the process it is possible to plan it around creating a new cycle that can feed into publications. It was confirmed that the strategic metering review was still planned as expected.
- 5.3. One MPC member noted that currently they are fully focused on the COVID-19 crisis and as such they find other strands of work to be somewhat a distraction. The MOSL presenter noted that the AMPR is very close to completion and should not take attention away from other workstreams. Furthermore, the MPOP will be used to monitor Vacancy/LUM across the market and prepare for the eventual restart of the market.



- 5.4. One MPC member asked what kind of prioritisation exercises were done by MOSL to determine which of their commitments are 'core' and which could be de-prioritised. MOSL responded that through SLT meetings they have examined the deliverables for MOSL to determine key areas to prioritise, pending a full review at the end of April. The Chair noted that during the last Panel, it was stated that MOSL's Business Plan will be reviewed by the Board and the expectation was that this would also filter into the Panel plan and some reprioritisation due to COVID-19. The MOSL representative explained that using previous work MOSL has done they will be in a better position understand changes to the market due to COVID-19 and find effective ways to prepare for the return to 'normal' operations.
- 5.5. One MPC member noted that as MOSL are funded and dependent on members, is there an opportunity for MOSL to ask for larger charges from members to undergo important work, and if so, how would that be balanced against the Retailers' need for cash during this period. A MOSL representative responded that currently MOSL has enough funds, paired with the expectancy that members will still pay MO charges, to continue operating but they are focused on delivering work efficiently and making the best use of their funds.
- 5.6. The MOSL presenter gave an update on the Urgent Changes taken or planned around the COVID-19 crisis. He noted that there will be more focus on transparency and informing the Trading Parties of any developments. He assured the MPC that MOSL will remain vigilant and continue monitoring the situation and any behaviours in the Market, particularly in relation to the Vacancy change and will be in a position to take action if necessary. The Chair asked if they can expect to see a report on this during the next MPC, to which the MOSL presenter responded that an update should be provided before then, likely during the coming weeks. The Chair asked whether MOSL requires any MPC support around these changes, to which MOSL responded that they will reach out to the MPC should they need feedback.
- 5.7. An Ofwat representative inquired whether the pause in the market and the data that would come out of this period would feed into later analyses focused on gathering insights and providing benefit to the market. The MOSL presenter noted that the extreme changes from the current situation could serve to highlight issues that would otherwise be unnoticed, which can later feed into analyses. An MPC member asked whether MOSL and Ofwat are still on the same page, considering the large changes over the last few days, and if they are actively sharing information, to which the MOSL presenter confirmed that MOSL are actively collaborating with Ofwat and will provide updates to market governance bodies as appropriate.
- 5.8. An MPC member noted that there are large differences in the third party identifiers that Trading Parties use and that if this data was more complete and accurate it would greatly ease the burden on Trading Parties in case of a situation similar to COVID-19 coming in the future. He asked a MOSL representative what kind of trends have been noticed in the way Trading Parties use third party identifiers. The MOSL presenter noted that there are many behaviours that were noticed around the market but many seem to be individual issues rather than market-wide. He confirmed that MOSL will continue to monitor and sample information to tease out trends that can be addressed. He also noted that he would welcome input from Trading Parties or PfMs in any kind of trends around this that are noticed in the market.
- 5.9. One MPC member noted that while there may be variation in the TP approaches to marking premises vacant due to COVID-19, it should not be assumed that the same approaches will be taken in the future.



The MPC member also noted that it would be useful for MOSL to gather information on best approaches and share these within gatherings such as the User Forum to disseminate information. The MPC member expressed the view that the videos published are extremely useful and instead of holding User Forum in March suggested that it would be useful for MOSL to publish similar videos in lieu of User Forum in April with guidance/suggestions for Trading Parties in relation to COVID-19.

**ACTION: MOSL to share with MPC possible approaches on how insight around COVID-19 can best be disseminated.**

**A36\_02**

- 5.10. One Wholesale MPC member noted that guidance as to how Wholesalers are to resolve issues around the influx of vacant premises is unclear. A MOSL representative explained that Wholesalers have been sampling vacant properties for analysis and they can share any insights found with MOSL. MOSL stated that there should be a route for trading parties to flag issues or emerging trends in the market. The MPC representative explained that their Trading Party has been looking at thousands of vacant properties for their analysis and it would be a long time until a proper review of vacant properties and collecting evidence could be undertaken by wholesalers.
- 5.11. One MPC member noted that one difficulty coming out of the COVID-19 crisis will be to find which vacant premises marked during the COVID-19 crisis can be turned back to occupied as soon as the period is over.
- 5.12. The Chair and MOSL asked each MPC member to describe the issues they have identified around the COVID-19 crisis, such as the impact on operational capability, their views on switching, and any early insight they are seeing in terms of reporting.
- 5.13. To summarise, key impacts around COVID-19 are the increased focus on maintaining core services, the widespread suspension of services, such as meter reading, although this varied between service providers, meter exchanges and trade effluent sampling and the challenges associated with the moving of staff to homeworking. The value of alternatives to meter reading such as AMR and smart metering were highlighted and there was a suggestion from several members that it was important that AMR data be accessed by retailers at no or low cost. There was general agreement that the market should make the best use of the data that was going to be available during the COVID period. Issues around the lack of consistency when using vacancy flags and behaviours around the date used for the COVID-19 flag were also discussed. Furthermore, MPC members noted the potential severity of the financial impacts of COVID-19 for payments and debt and the need to ring fence previous bad debt away from that caused by COVID-19. Additionally, different views on how whether switching should happen during the period but a need to protect customer choice was acknowledged by members. shared.
- 5.14. A MOSL representative thanked MPC members for sharing their insight around the different issues they are facing in each of their companies. He explained that MOSL is looking to create template-type surveys through which Trading Parties can submit updates to MOSL regarding the issues/developments around COVID-19.



**ACTION: MOSL to create a survey-type communication channel for Trading Parties to share updates regarding issues around COVID-19.**

**A36\_03**

- 5.15. The Chair presented the draft joint statement between MOSL and MPC around COVID-19 to address the different questions from Trading Parties. The MPC was asked for any comments around the statement.
- 5.16. The supporting chair asked whether MOSL is still monitoring and reporting in a BAU manner on all performance standards, and whether a line could be added to mention if so. MOSL agreed.
- 5.17. An MPC member suggested adding more information as to how MOSL will be receiving regular updates on the impact of COVID-19 from Trading Parties.
- 5.18. Another MPC member noted that while the IPRPs and PIPs are acknowledged as being impacted by COVID-19, in the lower section there was no mention on the change to MPOP/PIPs to address the same issues as with IPRPs. MOSL agreed to add a point on this.
- 5.19. The Chair asked for these comments to be collated and incorporated into a new draft of the statement. An action around this was added under 5.25.
- 5.20. One MPC member suggested to be mindful of the impact on the operational capabilities of Trading Parties when asking for more information such as reports/updates, including IPRP/PRPs.
- 5.21. Another MPC member suggested that transparency is a key requirement for this statement, and that it would be useful to expand on the fact that the MPC and MOSL understand the pressures Trading Parties are facing. Furthermore, a piece could be added that as things are evolving quickly, MOSL could offer to maintain a Q&A section to help Trading Parties answer common questions related to COVID-19.

**ACTION: MOSL to create and maintain an FAQ section for Trading Parties to address common questions around COVID-19.**

**A36\_04**

- 5.22. An MPC member noted that the statement mentions a role for the MPC to contribute to the COVID-19 effort and asked for clarification around what the MPC can do to help. MOSL explained that there may be a role for MPC to flag issues and to help introduce urgent changes and the email identifies that MPC will continue to support these activities but recognising the impact of COVID-19 insight and adapted reporting piece.
- 5.23. The MPC member shared that he felt unsure on whether MOSL should continue to report as usual as it may have diminished value when there should be focussed attention on COVID-19 developments and market impact. He noted that with the major incentive mechanisms (fines, IPRPs) there is less value for Trading Parties to focus on reporting when staff could be redeployed to focus on efforts elsewhere within the business. The Chair explained that there is recognition that the situation has changed and reporting is not proceeding as normal. MOSL clarified that they want to keep tracking performance throughout COVID-19 to ensure a full data set. While MPS is automated, OPS is still very much self-reported and MOSL agreed that they should review the process of OPS in the context of COVID-19. The



MOSL representative clarified that the 'reporting as usual' aspect from the statement refers to the automated reporting that is generated every month, and that manual reporting will very much focus on the impacts of COVID-19.

- 5.24. The MPC member suggested pausing OPS for a few months while a better approach to reporting OPS is developed. MOSL agreed that this should be an area for review. The Chair stated that this should be recorded as an urgent action for MOSL. MOSL suggested discussing this within the MPC session, and the Chair agreed to discuss this during AOB.

**ACTION: MOSL to urgently review the process of OPS reporting and come back to Wholesalers as to the expectation to report OPS.**

A36\_05

- 5.25. The Chair stated that MOSL should provide a revised draft of the statement by 02/04.

**ACTION: MOSL to collate and incorporate comments from the MPC into a new draft version to be shared later with MPC members for final approval by 02/04/2020.**

A36\_06

- 5.26. An Ofwat representative suggested that the statement mention the possibility for issues to be escalated to both MPC and Ofwat.

## 6. MPOP A and B update

**Purpose: For Discussion (A) and Information (B)**

- 6.1. MOSL gave an update on status of MPOP workstreams. MOSL noted that while COVID-19 will have a significant impact on Vacancy/LUM figures, reporting will continue.
- 6.2. A MOSL presenter gave a summary of the Vacancy API paper introduced this month, which focuses on monitoring Vacancy in premises where there is consumption or a long period of no occupancy. MOSL will introduce the new Vacancy API but it will be used for monitoring purposes only during COVID-19.
- 6.3. The Chair asked the MPC if they have any questions.
- 6.4. One MPC member asked how MOSL expects to get meter readings on vacant properties given the lack of an incentive for Retailers to take these readings due to COVID-19. The MOSL presenter agreed that the COVID-19 situation will mean that readings are unlikely to happen and acknowledged that an incentive mechanism will need to be created. It was noted that the current guidance states that if a meter read is taken or submitted, the premise must be switched back to occupied, which could discourage meter reading as it could be due to other issues (e.g., leakage control).

**ACTION: MOSL to review the guidance around meter reading and determine whether that requirement (for a premise to be turned to occupied if a meter read is taken) should be removed.**

A36\_07





- 6.5. One MPC member noted that the original rationale of that rule might have been to help determine where occupied premises were flagged as vacant, and that it could use a small change to prevent discouraging meter reading. MOSL agreed that they do not want to discourage meter readings and that they will raise this and find out the original rationale behind the guidance.
- 6.6. A MOSL raised that without any reads due to COVID-19 then potentially the number of long unread meters may increase after the situation returns to normal.
- 6.7. A MOSL representative informed the MPC that MOSL has been undergoing an analysis of remote meter reads, finding that about 20% of all meters in the market have the capability to be read remotely (that is, does not require a meter reader to be physically in front of the meter). This would indicate that there is potential to keep receiving some meter readings which would help record customer behaviour.
- 6.8. One MPC member agreed that in BAU situations AMR readings can be taken, but that there is a difficulty in taking them in the current situation. In densely populated regions, AMR readers are often taking public transport, which could pose a problem considering the current crisis. Furthermore, many of these readers are not considered essential staff.
- 6.9. A MOSL representative found, through discussions with Trading Parties, that while AMR data is appreciated it can often cause more issues for Retailers with billing and other administrative areas, and there is no guarantee that it can be entered into the system.
- 6.10. It was noted that within the Vacancy API paper the recommendation is the same for a number of key issues, which is somewhat unclear and may not be quick wins. The MOSL presenter agreed and explained that these can take longer to develop, and would be implemented at a later date.
- 6.11. The MOSL presenter raised that long term vacants may be de-prioritised by trading parties after COVID-19 and the focus may be turned to the Vacants that arose as part of COVID. He noted that any other comments/questions can be addressed to MOSL through the Market Performance Inbox.
- 6.12. A MOSL representative presented their analysis of Read Rejections for Long Unread Meters. MOSL has found 14.5k LUMs, 10% of the total which have had read rejections over the last 12-months which could be resolved with a quick resubmission. He explained that many of these rejections were due to asset data quality issues and process issues.
- 6.13. The MOSL representative noted that the view would be for Retailers and Wholesalers to work together to solve these issues, much of which was being done through the Pairing Improvement Plans (PIPs), but these would require a review to ensure they are appropriate.
- 6.14. Regarding legitimate reads being rejected, MOSL suggested that potentially the data could be retained despite the rejection if one retailer read the meter for another retailer but realised that this would need to be optional and kept separate from reads provided by the registered retailer of the meter.
- 6.15. MOSL stated that meter level analysis should be looked at but that this was unlikely during COVID-19 period due to other priorities. They also acknowledged the value of undertaking read rejection analysis periodically to gather a snapshot of rejections and the reasons behind them.



- 6.16. MOSL also raised that CMOS captures all errors around a rejection but only shows the Retailer the final rejection, and as such a Retailer may re-submit the read after fixing the final error but then finds there are more reasons for rejection. MOSL recognise issues like this are not user-friendly and should be addressed in the future.
- 6.17. An MPC member commented that the paper around Read Rejections for LUMs was very well made and provides a basis for a very quick win around cleaning and resubmitting the data highlighted, which could be done well even considering the current homeworking directives.
- 6.18. An MPC member wanted to clarify whether the Vacancy API is to be introduced in the following Financial Year. MOSL confirmed that this is the plan.

**ACTION: MOSL to introduce the Vacancy API in the 2020/20201 Financial Year.**

A36\_08

## 7. Conflict of Interest discussion

**Purpose: For Discussion**

- 7.1. MBr has highlighted that as he works for the Trading Party who is the subject of PRP consideration.
- 7.2. The Chair asked MBr if he was declaring a conflict of interest regarding the section 'Trading Party PRP Discussion' and would therefore be recusing himself, to which MBr confirmed that there is a potential conflict of interest due to him being employed by that Trading Party.
- 7.3. The Chair noted that under Schedule 10 in the MAC codes an MPC member must recuse themselves from performance rectification discussions related to their own employer, and that this is also detailed in the Performance Escalation Policy document which stipulates that unless the MPC members unanimously vote to allow the member in question to remain then they cannot be party to the discussion. The Chair continued to say that that the MAC was clear on the issue.
- 7.4. MBr had the opportunity to make his case to the rest of the MPC. He noted how all MPC members have signed documents confirming that they will act in the interest of the Market and not of any Trading Parties, and has also expressed that a unanimous vote is a high bar to pass in order for a member to remain in the discussion.
- 7.5. MBr left the conversation and the MPC discussed the merits of each position before taking a vote. One MPC member noted that in a previous MPC, when a discussion was held on whether an IPRP should be escalated to a PRP, it was decided that in that scenario an MPC member employed by that Trading Party should not attend the discussion. The Chair specified that she wanted to know whether the view of the room on that matter had changed since that discussion as a formal escalation had now taken place.
- 7.6. The MPC voted on whether MBr should be joining the rest of the MPC in the PRP Discussion following the PRP Presentation. The vote for him to be present was not unanimous and as such MBr will not be joining the rest of the MPC during the PRP Discussion section of the agenda although he was welcome to stay for the presentation.



## 8. Trading Party PRP Presentation (closed session)

Redacted for publication

## 9. Trading Party PRP Discussion (closed session)

Redacted for publication

## 10. MPOP 20/21

### **Purpose: For Discussion**

- 10.1. MOSL presented their plans for next year's MPOP. They noted that it should address the issues around COVID-19 which will impact on many industry processes, and as such Trading Parties' resource constraints and priorities would need to be considered.
- 10.2. The MOSL presenter acknowledged that COVID-19 will have a large impact on the industry but noted that in a post- COVID-19 industry there may be things that can be done as part of MPOP to improve the situation and help get the market back to normal. There would be a focus on workplans which do not require a heavy involvement from Trading Parties as they may struggle with resource constraints during the period.
- 10.3. An MPC member agreed that the focus should be on regaining a BAU position following COVID-19, and that during COVID-19 all efforts should be focused on supporting the market through the crisis period as best as possible. He noted that the transition back to BAU should be the main focus.
- 10.4. Another MPC member suggested that MPOP could be split into 3 phases, namely 'COVID-19', 'transition out of COVID-19', and finally return to 'BAU'. He questioned whether this would be the better approach as it differentiates between priorities during certain times, with the transition into BAU being the key part. The Chair asked members for their view on this approach to the plan. Some MPC members expressed agreement with the plan. A MOSL representative shared that he liked the 3-stage plan and that potentially data quality work could take place ready for the BAU phase. MOSL clarified that this data cleanse exercise could be done by MOSL with limited additional work for Trading Parties.
- 10.5. A CC Water representative agreed that estimated billing is the biggest concern from the customer perspective. He noted that there will be some premises that will severely reduce their consumption but not become vacant, which might not be reflected accurately in their bills if they are estimated. A MOSL representative answered that there is an expectation that Trading Parties will still input meter readings as much as possible and that during this different phase of operations there could be more focus on data cleanse and data quality activities. The Chair inquired whether these activities should be MOSL-centered or would require significant input from Trading parties. The MOSL representative confirmed that these activities should and are undertaken by MOSL and they can feed into Trading Parties.
- 10.6. One MPC member noted that the focus on MPOP should always be on ensuring customer outcomes considered and that focus is put on helping customers recover from the COVID-19 issues.



- 10.7. The Chair asked MOSL what the timelines around publishing MPOP are and if they are influenced by COVID-19. MOSL responded that the consultation for MPOP is supposed to start 2 weeks from the March MPC, with a view that the publication date should be the 29<sup>th</sup> of May. Considering the COVID-19 situation, that timeline is no longer achievable, especially considering the re-writing of MPOP around COVID-19. The MOSL representative asked MPC when they think it would be appropriate for MOSL to send the consultation around MPOP to the market.
- 10.8. One MPC member highlighted again that focus should be on the transition back to BAU after COVID-19, with issues such as bill estimation being foreseen as the focus of work in a few months time, as Trading Parties and customers would look at how best to manage the transition out of COVID-19.
- 10.9. A MOSL representative noted that MPOP 20/21 was already heavily focused on Data Quality improvement, and explained that it would be a matter of rephrasing these into a COVID-19 perspective, but had reservations as to whether COVID-19 should be included in MPOP. The MOSL representative also recommended that it would be a good time for the market to introduce some event management controls so that changes can be made more quickly and efficiently.
- 10.10. The Chair asked MOSL to compile some key questions for MPC members to inform MOSL's thinking around how to integrate COVID-19 into MPOP with a view for this discussion to continue in the relevant sub group and in the next MPC.

**ACTION: MOSL to compile questions for MPC members around COVID-19 integration in MPOP and share with MPC, to be discussed in the sub group and as a follow up during the next MPC.**

**A36\_10**

- 10.11. A MOSL representative noted that MOSL is mandated to produce an MPOP within the year but not at a certain time. He explained, though that since this is 'the year of COVID-19' it would be odd not to include COVID-19 in the MPOP.
- 10.12. The Chair asked how the COVID-19 situation is going to affect the Market Performance Framework (MPF) Roadmap. A MOSL representative noted that the MPF Roadmap already had very ambitious (but achievable) timelines, so it would be beneficial to revisit these and review what would be achievable.
- 10.13. MOSL agreed to discuss issues around the introduction of COVID-19 in MPOP with the sub-groups and come back to MPC in April with a status update regarding timelines and structure.

**ACTION: MOSL to consult with sub-groups in April around COVID-19 integration in MPOP and come back to April MPC with a status update regarding timelines and structure.**

**A36\_11**

- 10.14. MOSL confirmed that TN, DM, JW were part of the MPOP 20/21 sub-group. When the MPOP A and B were combined, WM also joined the sub-group.

## 11. Performance Update (IPRPs)

**Purpose: For Information**



- 11.1. MOSL gave an update on the MPS/OPS Performance.
- 11.2. MOSL noted that January was a 'spike month' for MPS 18 which means that all meters unread at market open hit the performance time parameter, but that this spike was smaller than others which indicated improved performance within the market.
- 11.3. Task volumes remained stable in January with small increases in MPS 15. The number of Time Parameter 3 failures in MPS 15 has increased, coming closer to the number of failures before the removal of charging. MOSL posited that the decrease in MPS 15 TP3 failures correlated with the reduction in LUM meters market-wide.
- 11.4. MOSL presented a view of the current active MPS IPRPs. One IPRP ended last month, with a recommendation from MOSL to de-escalate. Three IPRPs were de-escalated this month.
- 11.5. Regarding the Water Plus (Severn-R) MPS 17 IPRP, MOSL recommends de-escalation due to the improved performance against planned milestones and the fact that further activities for improvement are captured in the PRP for MPS 16. The MPC gave their views on whether they are comfortable de-escalating the MPS 17 IPRP. One MPC member noted that due to the drop in performance in the previous month he does not feel very confident that Water Plus can achieve a high performance in the next month, even leaving aside considerations about COVID-19.
- 11.6. One MOSL representative noted that due to the fact that in 5 out of 6 months the performance was above the milestones, MOSL's policy would suggest that the proper decision would be to de-escalate the IPRP into a watch. MPC members agreed that a de-escalation to a Watch would be appropriate, while noting concern for the performance in the previous month, and keeping in mind the decrease in performance expected due to COVID-19. An MPC member suggested that Water Plus be monitored actively for a few months after the COVID-19 period ends. Another MPC member noted that the milestones suggested were not ambitious enough to get their performance to Median level, but have at least brought them close to a Mean level, so at the very least the IPRP process should be paused while focus is diverted on managing due to COVID-19.
- 11.7. The MPC agreed with the proposal of de-escalation of the Water Plus MPS17 IPRP.

## 12. IPRP Process Review

### **Purpose: For Discussion**

- 12.1. MOSL presented a summary of the IPRP Review conducted during the last MPC and described the key themes that came out of that review.
- 12.2. The MOSL presenter reviewed the difference between fluid and static thresholds, with the static threshold being fairer and more transparent but providing a larger risk of many trading parties as underperforming due to a market-wide dip.
- 12.3. Regarding the trigger, the merits of a fluid (i.e., in context) or a binary (on or off) trigger were explained, with the fluid trigger more easily accounting for circumstances which might affect performance, but being more resource-hungry as it takes more consideration and manual work for MOSL.



- 12.4. Regarding the timescales around IPRP, the planning process that MOSL undergoes is quite short and does not allow for much time for root cause analysis of issues, but is more focused and provides early warning of poor performance. A longer planning process can allow for a better understanding of issues around underperformance but requires more attention and work from MOSL.
- 12.5. Regarding the template, an open template can be easier to create and manage but allows for interpretation, omission of data, and might not provide enough guidance. A standard template can provide common guidelines and auto assess, but requires more focus and time to create.
- 12.6. Regarding reporting and ownership, selective reporting against IPRPs provides focus on areas most in need of MPC input but requires resources to decide what is included/excluded and may not be as transparent. On the other hand, generic reporting against all TPs is easier to run and drives improvement against performance in a fairer and more transparent way, at the cost of not being focused.
- 12.7. Regarding escalation to the MPC, discretionary escalation allows for context to be taken into consideration but is more resource hungry for MOSL and lacks transparency. A performance driven 'triggered' escalation process is more transparent, fairer, and scalable but may catch TPs with low task volumes.
- 12.8. The MOSL presenter described the next steps around the review of the IPRP process. During the first quarter of FY 20/21, the subgroup would explore the template for IPRPs and expand on the trigger and threshold options, so they can be presented to the MPC. Following this, the template and processes for IPRPs can be built, with the sub-group reviewing timescales and code implications. Following the first quarter, MOSL can demonstrate the template and confirm the IPRP process with MPC. Initially, the timescale for this would be for a September launch, but this may be deferred due to COVID-19.

## 13. AMPR Progress

### **Purpose: For Information**

- 13.1. MOSL presented a high level overview of their content for the Annual Market Performance Report (AMPR), with a timescale for publishing on the 27<sup>th</sup> of April.
- 13.2. There are multiple strands of content which include a section detailing improvements made within Market Performance and the IPRP Review. Furthermore, it also includes updates on market movements (Market Entry, mergers, acquisitions, and exit) and Settlement. It will also feature a section around MPOP and its four programmes. Finally, it will feature a section looking at future endeavours.
- 13.3. MPC members were supportive of the AMPR update.
- 13.4. MOSL informed the MPC of the timings around the AMPR, with the 8<sup>th</sup> of April being the submission date to MOSL's communications team.

## 14. MPC Workplanning Session

### **Purpose: For Discussion**



- 14.1. MOSL gave an update on MPC's commitment in MOSL's projects and likely delays as a result of COVID-19. All programmes of work have adequate involvement from the MPC and MOSL direction.

## 15. Any Other Business

### **Purpose: For Discussion**

- 15.1. MOSL will take the discussion around OPS Reporting offline with MPC members.
- 15.2. One MPC member asked whether there could be an industry co-ordinated approach to the introduction of AMRs. One MOSL representative agreed that it would be a very good goal to achieve and suggested that this should be discussed between members offline to assess the feasibility of this. An MPC member suggested that consideration should be given to the avenue of free AMR data.

**ACTION: MOSL to investigate AMR and hold discussion around AMR and free of charge AMR and provide an update to MPC.**

**A36\_12**

- 15.3. MPC members noted that the Chair has done a very good job in chairing this teleconferenced MPC session.
- 15.4. The Chair informed that while she had appreciated the level of engagement and contribution received and had enjoyed working with all those involved in the MPC she is unable to permanently reside as Chair of the MPC due to the level of time commitment involved and her capacity constraints due to other working commitments she has agreed to stay on as the Chair for another 3 months to allow the consideration of options for leadership of the MPC and provide stability through this difficult time.

### List of Actions

A36\_01: MOSL to track any delays to the Audit due to COVID-19.

A36\_02: MOSL to share with MPC possible approaches on how insight around COVID-19 can best be disseminated.

A36\_03: MOSL to create a survey-type communication channel for Trading Parties to share updates regarding issues around COVID-19.

A36\_04: MOSL to create and maintain an FAQ section for Trading Parties to address common questions around COVID-19.

A36\_05: MOSL to urgently review the process of OPS reporting and come back to Wholesalers as to the expectation to report OPS.

A36\_06: MOSL to collate and incorporate comments from the MPC into a new draft version to be shared later with MPC members for final approval by 02/04/2020.



A36\_07: MOSL to review the guidance around meter reading and determine whether that requirement (for a premise to be turned to occupied if a meter read is taken) should be removed.

A36\_08: MOSL to introduce the Vacancy API in the 2020/20201 Financial Year.

A36\_09: MOSL to draft official communications for Water Plus' PRP acceptance.

A36\_10: MOSL to compile questions for MPC members around COVID-19 integration in MPOP and share with MPC, to be discussed in the subgroup and as a follow up during the next MPC.

A36\_11: MOSL to consult with sub-groups in April around COVID-19 integration in MPOP and come back to April MPC with a status update regarding timelines and structure.

A36\_12: MOSL to investigate AMR and hold a discussion around AMR and free of charge AMR and provide an update to MPC.

The next MPC meeting is scheduled for 29<sup>th</sup> April 2020

Location: [via Microsoft Teams](#)