

## Minutes of the Metering Committee Meeting 53

19 August 2025 | 09:30 – 13:00

Via MS Teams

Status of the Minutes: Approved

### MEMBERS PRESENT

Spencer Mattia	SM	Chair*	Steve Formoy	SF	MOSL Affiliate Member*
Jordanna Lo	JL	Retailer Member	Cillian McCarthy	CM	Retailer Member
Jamie Davies	JD	Alternate Retailer Member	Rosie Rand	RR	Wholesaler Member
Sindiso Bango-Dube	SBD	Retailer Member	Mitchell Yeoman-Boldry	MYB	Wholesaler Member
Ben Kershaw	BK	Retailer Member	James Mackenzie	JM	Customer Representative Member
Angela Brown	AB	Wholesaler Member			

*\*Non-Voting Members of the Committee*

### OTHER ATTENDEES

Chris Dawson	CD	MOSL Presenter	Elliot Smith	ES	MOSL Presenter
Olivia Bletsoe	OB	MOSL Presenter	Toks Talabi	TT	MOSL Secretariat
Abu Rashid	AR	MOSL Presenter			

### APOLOGIES

Kevin McCalliskey	KM	Wholesaler Member	Paul Heron	PH	Retailer Member
Michelle Thompson	MT	Wholesaler Member			

## Welcome, Apologies and Compliance

- 1.1. The Chair welcomed everyone to the Metering Committee (“Committee”) meeting and noted that apologies had been received from KC, MP and CM.
- 1.2. The Chair drew attendees’ attention to the MOSL recording policy and reminded members that, in line with section 5.7 of the Market Arrangements Code (“MAC”), they were to act impartially and not in the interest or as a representative of any organisation or individual.
- 1.3. It was confirmed that the meeting was quorate.

## 2. Minutes and Actions from Previous Meetings

- 2.1. The Committee agreed to approve the minutes of the Metering Committee meeting held on 15 July 2025 as an accurate record of the meeting.
- 2.2. The Committee decided to close all the presented actions and noted that updates would be given later in the agenda.
- 2.3. The Committee noted that there are no actions to remain open.

## 3. Smart Meter Read Hub (DSM) Update

- 3.1. The Committee received a brief update on the Smart Meter Hub. SM advised that the engagement with CGI is ongoing, with regular workshops focusing on IT security, reporting, and requirements gathering for Phase One. The proof-of-concept requirements are on track for review and sign-off by the end of August. Phase One aims to deliver testing by year-end, with feedback to follow in the New Year. Phase Two is planned alongside the CMOS change in December 2026, with further requirements being collected for potential future phases, including considerations around third-party access for non-government bodies as part of MOSL’s open data strategy.

- 3.2. SM provided an overview of the current planning stages. It was noted that recruitment for the steering group had attracted approximately a dozen applications from wholesalers and retailers, which SM considered a positive response. Furthermore, the application window had closed at the end of the previous day. A panel composed of three MOSL SLT members would now review the applications and arrange interviews over the coming weeks. Also, SM explained that nominations had been received for the strategic panel, the MOSL Board, wholesalers, retailers, and NAV, resulting in a broad range of applicants. The first steering group meeting was originally planned for 11<sup>th</sup> September, however SM advised that this had been postponed to the 24<sup>th</sup> September to allow sufficient time for interviews, particularly in light of the holiday period. SM anticipated that the interview process might continue into early September and confirmed that the steering group would commence its work the following month. Additionally, SM highlighted that the Smart Meter Advisory Forum (SMAF) had been extended, adopting a task-and-finish approach. Several metering committee members also attended the advisory forum. As the team was operating within a waterfall programme, the intention was to finalise requirements and submit them to CGI for the relevant project phase. Once those requirements were developed and delivered, attention could then turn to addressing further requirements for subsequent phases in a structured manner. Looking ahead, SM suggested that the final meetings for both phase one and phase two were likely to take place at the end of September. It was possible that further meetings would be reconvened next year to address additional requirements that might arise and fall outside the scope of the current phases. SM concluded by stating that progress was positive at present.
- 3.3. CD informed the Committee that the meeting scheduled for Thursday, 28<sup>th</sup> had been cancelled, with the next meeting to be held on 11<sup>th</sup> September. SM also confirmed that arrangements were underway to establish a Smart Meter Hub working group around November of the current year. This group would undertake activities broadly similar to those previously carried out by the CAG, working with the MOSL team to review relevant code obligations and modifications required for the implementation of phase two in December of the following year. It was noted that there would be no code impact arising from phase one, however phase two would necessitate code changes. The working group was expected to convene from November through to the spring of the next year, providing oversight and input to help shape the necessary documentation and reassure the CCC regarding the

scrutiny applied to all proposed modifications. An invitation for participation in this working group would be issued in September or October.

- 3.4. The Committee discussed the timeline for phase two and the potential implementation of third party access, specifically questioning whether this would be completed within the financial year 2026/27. It was clarified that provision for access to government bodies, such as Defra, would be included in the December 2026 release, scheduled for the 16<sup>th</sup> December. This would involve supplying data outputs in a manner consistent with previous approaches, such as those used for bilaterals for BRMX. At present, this is the only form of third party access envisaged within phase two. Any further types of third party access would be considered under a possible phase three, subject to business planning and the presence of a suitable business case. There is currently no mandate to deliver beyond phase two; requirements for future expansion would be addressed as part of MOSL's ongoing business planning. The Committee further noted that any potential phase three would be shaped by the panel's work on open data, the development of an open data strategy, and the determination of what third party access

#### 4. Strategic Metering Programme Update

- 4.1. The Committee was informed about progress on the Strategic Metering program, which includes 15 projects initiated and 3 completed to date.
- 4.2. AR provided the Committee with an update on the strategic review of settlement as part of the Strategic Metering Programme. The work, which is progressing well, remains complex and demands considerable effort from all involved. Currently, in August, two group meetings have taken place one approximately two weeks ago. During these sessions, there was extensive discussion regarding various components of the strategy, building on the feedback received from the publication in May. This feedback has played a key role in further refining and developing the strategy. Looking ahead, the next steps involve agreeing on the strategy's components in September, followed by a market consultation set to take place from mid-September to early October.
- 4.3. AR then summarised key points discussed in the working group. At the second meeting, a revised objective for the segment strategy was presented. The original objective, as outlined in the May position paper, was considered too high-level and was robustly challenged by members. The revised objective now emphasises four main points: ensuring accurate

settlement and customer billing and refunds; facilitating timelier settlement calculations; strengthening collaboration between market participants in relation to settlement and data management and promoting greater water efficiency. However, it was suggested that the first two points could be simplified and merged to avoid unnecessary detail. Furthermore, the group debated the appropriateness of including 'greater water efficiency,' ultimately recommending that this point be broadened in scope and reframed as 'innovation'. This revision is currently being developed, with plans to present it at the next working group meeting. AR proceeded to outline the principles underpinning the strategy, noting that these were less contentious and largely standard, having been drawn from market codes and other existing strategies and programmes. There was some discussion regarding the terminology and descriptions particularly around 'maintenance of accuracy' and 'cost fairness', which replaced the previous term 'cost effectiveness'. These principles will be more fully described in the forthcoming market consultation documentation. Finally, AR addressed the various themes to be included in the strategy. Whereas the original position paper included nine themes, this has now been reduced to seven, following general consensus. Notably, self-serve settlement has been identified as a high priority that will require significant effort to support the market. Other themes including regularity of settlement runs, settlement impacts on processes, volume estimation and settlement, and cash flow were discussed comprehensively, with recognition of the need for possible reprioritisation. There was general consensus about including these themes, though the specifics, such as timelines and the dependencies and interactions between projects, need further definition. Additionally, the themes of pricing signals and insights from other utilities were considered as areas requiring further work within the strategy. In total, it is estimated there may be approximately 18 projects covering these themes, indicating a substantial amount of activity in the coming years. This provides an overview of the current progress in developing the strategy.

- 4.4. CD provided updates on project activities. The National Metering Strategy Review had started, and CD noted that it would be discussed further in the meeting to obtain input from Committee members. CD noted that the associated paper had been circulated the previous week. CD provided an update regarding the Smart Meter Dashboard, noting ongoing engagements with wholesalers to obtain data and input. An update was also available on the skip code change, which would be covered during the session. Regarding interim guidance, CD reported the document had reached 298 downloads, with minor feedback received from

various stakeholders, including some adjustments suggested by Affinity. CD highlighted a point for discussion raised by a third party, questioning whether the interim guidance should reference requests for wholesalers to share meter data, or at least to maintain the capacity for such sharing upon request. Committee members were invited to consider this point and to provide feedback later in the meeting. On continuous flow, CD remarked that the committee was approaching the time to consider reopening the discussion, with a question as to whether it was the appropriate moment and if there was sufficient capacity, particularly for RR, to contribute should the topic be revisited. Lastly, CD noted that work on transfer reads was ongoing. There had been an update from OB earlier in the meeting, and work continued on updating the related dashboard. The committee would also revisit meter read obligations within the week.

- 4.5. RR stated that currently there is no capacity to take on additional responsibilities due to ongoing work on the smart meter hub. RR suggested waiting until the hub is operational before reassessing potential implications for continuous flow. RR also invited others to share any insights on continuous flow based on the initial guidance, and noted that, from Thames' perspective, current processes remain unchanged. Although understanding has increased, RR reported that there is not enough new information at this stage to begin a second phase of continuous flow work. CD provided an update to the group, noting that the team is working to integrate priority levels into the data submissions from wholesalers, as outlined by the continuous flow guidance. CD clarified that while inclusion of these priority levels will not be a mandatory requirement at this stage, efforts are underway to incorporate them into the process. CD suggested that this addition could prove useful going forward. SBD raised a query regarding third party requests, clarifying that the intention was not to assist wholesalers in reducing their communication with the market. SBD asked if there was any particular reason why third parties appeared to have reservations about working directly with retailers when accessing data. Drawing on recent experience, SBD noted that, for a considerable period, Water Scan had functioned as a third party for self-supply, acting as a conduit between the customer and the market, thereby operating as an intermediary. SBD sought to understand whether there was an underlying reluctance or concern regarding third parties engaging directly, speculating on the potential scenario in which a proliferation of third parties could create increased complexity possibly resulting in wholesalers needing to coordinate with an expanding number of third parties, in addition to the existing 45 retailers. SBD questioned whether there were associated risks should such a situation arise.

- 4.6. CD explained that, according to discussions with a specific third party, there are situations where such parties interact with retailers; however, some services provided by third parties overlap with those of retailers. Therefore, the potential for collaboration depends on the type of service involved. In certain instances, third parties cooperate with retailers, but when their services compete directly, collaboration may not be practical. CD also noted the possible impact of an increased number of third parties, which could add complexity if wholesalers were required to share data both with third parties and the current 45 retailers. This scenario could necessitate developing a separate external data-sharing platform, distinct from the current hub. CD indicated the need to assess whether the existing data hub can meet these requirements, as doing so could result in cost savings for wholesalers. Nevertheless, it was acknowledged that, as the market operator, there are constraints on what can currently be implemented. SBD agreed that this situation represents a potential risk for the market. The committee noted that an understanding of market dynamics may be influenced by local perspectives. A Committee member inquired whether an aspect of the market ecosystem was being overlooked if a third party competes directly with the retailer. It was clarified that, as currently understood, all transactions are routed through the hub, which is financed by the trading party. The discussion highlighted a scenario where one participant operates within the market in competition with others but does not directly contribute to operational costs. This results in a circumstance where a direct competitor coexists with regional participants without sharing certain expenses.
- 4.7. AB highlighted concerns regarding the continuous flow guidance, noting that while it is not a mandatory item, it has raised apprehensions. AB acknowledged that RR is extremely busy, and felt it may not be fair to review the guidance immediately. However, AB emphasised the necessity of establishing rules, as retailers could potentially rate their wholesaler lower in surveys if the wholesaler does not provide certain items that competitors do. AB observed that this information is particularly valuable for retailers, though wholesalers may have their own guides and procedures. AB also cautioned that any post go-live changes to the guidance in the hub would require a reconsideration of systems, especially as efforts are underway to examine the guidance now. Furthermore, AB stressed the importance of careful timing, expressing nervousness about the initial rollout of the hub, due to the potential impact on rules, priorities, geographical areas, and categories of premises. RR raised an issue about including continuous flow data in the hub. RR stated that, based on initial discussions, it was understood that continuous flow being a calculated value rather than a raw data set would

not be part of the hub. RR explained that if the hub were to calculate continuous flow itself, that would be a different matter; however, as it currently stands, it is not a raw data set that could be transferred. RR highlighted that, although flat continuous flow readings can appear on smart meters, these differ from the calculated version found in current guidance. RR cautioned that this guidance should not be conflated with raw data, which is used to calculate continuous flow and determine its application. Echoing AB's concerns, RR recommended against including continuous flow in the hub, particularly for phase one, citing the risk of added complexity and the challenges in providing such data easily. RR concluded that, due to the switching behaviours and the nuanced nature of calculated values, continuous flow data should not be incorporated at this stage.

- 4.8. The Committee discussed two points raised by JL. Firstly, the matter of data sharing with third parties was considered. It was noted that there is a potential inconsistency if interim guidance encourages wholesalers to share smart meter data with third parties, but the read hub strategy reserves such sharing for later phases. Concerns were expressed that rollout of certain smart meters, which do not permit the addition of loggers, could restrict third parties from accessing data they previously received, raising questions about fair market access. The Committee acknowledged the need for further discussion on whether current guidance should recommend wholesalers consider third party data requests, with the understanding that data sharing decisions ultimately rest with the wholesaler. There was also agreement that the issue of data ownership should be clarified. Members highlighted that the data in question belongs to the customer, who should have control over its distribution, and that any sharing with third parties requires explicit customer consent, in line with contractual obligations and data protection regulations.
- 4.9. RR clarified that the guidance on continuous flow was introduced to standardise calculations among wholesalers, as each previously used different methods. The recommended best practice is to monitor for at least 14 days with a minimum of one litre per hour every hour. RR acknowledged that some wholesalers still adopt a shorter monitoring period, such as five days, but explained there are valid reasons for longer durations. For example, extending to two weeks offers a stronger indication of non-genuine usage, whereas a shorter period may be preferable when a significant leak requires urgent action. RR emphasised that the guidance aims to foster a collective approach but remains advisory rather than mandatory. RR also highlighted the associated risks of treating this metric as definitive within the hub, noting that it is ultimately a calculated value. SF highlighted three aspects regarding third

party access: access via the meter read hub (potentially a phase three, dependent on open data strategy), existing wholesaler data sharing with third parties where customer consent is verified, and the potential value in standardising this process across the market. SF pointed out the need for wholesaler interest before pursuing a standard industry approach and mentioned separate challenges related to loggers, especially in the context of smart meter rollout. RR agreed with SF, noting the close connection between logger requirements and data sharing. RR explained that if a logger cannot be used with a smart meter, it becomes necessary to provide smart meter data to third parties as an alternative. RR emphasised that the two issues are closely linked. Additionally, RR emphasised that, where smart meter data is available—whether via a data hub or wholesaler process—it should be utilised for transfer reads rather than relying on estimated reads or requiring customers to submit their own readings. RR noted that using smart meter data helps to avoid unnecessary involvement from customers, particularly in light of health and safety considerations. It was suggested that the code change should include a requirement to use smart meter data when available, in order to future-proof the process and mitigate the need for further amendments at a later stage.

4.10 CD reported that certain level three activities have now commenced. Furthermore, CD noted that consumption on vacant properties is being addressed as part of the meter read obligations review, which has already been conducted. In addition, the cost-effectiveness of meter reads is also under consideration. CD highlighted that consultation with Ofwat is currently open, and confirmed that both MOSL and the committee will, therefore, be submitting a response. Notably, assistance from the committee has been offered, particularly regarding the impact and cost-effectiveness of meter reads. Moreover, CD stated that engagement with Ofwat continues on a monthly basis. Finally, CD advised that a review of existing guidance, specifically regarding the transition from logger to smart meters, has commenced or is planned.

4.11 The chair thanked CD and AR for their presentation.

## 5. CPW159- Transfer Reads

5.1. OB presented the Committee with a review of the CPW159 code relating to estimated transfer reads. The Committee noted that the proposed CPW159 code change seeks to address ambiguity regarding the use of estimated transfer reads in customer supplier

transfers. It was highlighted that approximately 70% of current transfer reads are estimated, resulting in inconsistent retailer behaviour and potential customer safety risks, particularly when customers are required to obtain their own meter reads. Furthermore, OB outlined eight proposed requirements, including the necessity for a logged written agreement with customers, mandatory remedial action by retailers within specified timelines, provision for the market operator to request evidence, defined timelines for customer reads, and the stipulation that estimated reads serve only as a backstop, with explicit consideration of customer safety. The Committee was advised of the summarised consultation responses from retailers, wholesalers, and CCW. There was general support for the requirement of logged agreements and remedial action; however, concerns were raised regarding increased administrative burden, the need for clarification around evidence and definitions of remedial action, the impact of proposed timelines, and the importance of a clear definition of 'safe' for customer reads. Refinements were proposed to the Committee, such as issuing guidance on the necessary evidence, defining 'safe' based on the customer's own risk assessment, clarifying that remedial action encompasses any corrective measure, and considering adjustments to the timelines for remedial action. The Committee agreed not to pursue an alternative solution that would necessitate significant changes to existing systems.

5.2. MYB and JD discussed the implications for customer safety, particularly in relation to liability should an accident occur during a customer read. As a result, it was agreed that legal teams would be consulted to clarify the position on liability and to determine whether more prescriptive guidance was required. Meanwhile, RR, JL, and AB considered the role of smart meter data; accordingly, RR, JL, and AB concluded that where such data are available, these should be prioritised over estimated, or customer reads. Nevertheless, RR, JL, and AB also recognised customer preferences and the necessity for clear code wording to ensure the solution is future-proof. In addition, JM raised concerns regarding the complexity of the proposed solution, emphasising the need for simplicity and clarity. Furthermore, JM highlighted the potential impact on competitive dynamics between retailers, suggesting the adoption of a single service level agreement and questioning the need for certain administrative burdens in the absence of clear evidence of customer harm.

5.3. The Committee was informed of the forthcoming steps. OB stated that the MOSL team will seek legal advice on liability, evaluate potential requirements for smart meter data usage, and provide an updated solution at the next meeting for confirmation, with the intention to obtain approval prior to advancing to the Code Change Committee.

5.4. The chair thanked OB for the update.

## 6. Meter Read Obligation Workshop

6.1. The Committee continued discussions related to the Meter Read Obligation workshop from the July Committee meeting. AR explained that the purpose of this ongoing discussion was to present additional assessments on meter read obligations and determine next steps and actions.

6.2. AR presented data concerning internal meters at vacant sites. As of August this year, the market comprised approximately 1.27 million meters, of which around 165,000 were at vacant sites, equating to 13% of the total. Within this, about 50,000 or 4% were internal vacant meters, meaning one in every 25 meters fell into this category. The technology breakdown showed that roughly 61% of these internal vacant meters were traditional "dumb" meters, while 30% were AMR, 5.6% were touch meters, and 3.3% were smart AMI. For context, 30,339 dumb internal vacant meters represented 3.9% of all dumb meters, whereas 1,627 smart AMI internal vacant meters accounted for 1.2% of all smart AMI meters. Thus, the majority of internal vacant meters were either dumb meters or AMR. AR then addressed bilateral requests regarding these meters, finding approximately 6,862 total requests across 50,000 internal vacant meters, with only 250 live at the time, less than 1% of the overall total. Most requests had been closed or completed, with a few cancelled. AR noted the possibility of a backlog, as highlighted by Jamie's earlier comments, since not all requests may have been submitted. Lastly, AR summarised previous committee discussions, noting that internal meters at premises with low water usage such as churches or community centres could present undetected issues with potentially high financial impact. A single annual meter read might not sufficiently identify anomalies, and customers had indicated a preference for more frequent readings to ensure accuracy. The committee had not shown strong support for annual reading and, therefore, AR recommended maintaining more frequent meter readings and not progressing with the annual meter read proposal at this time.

6.3. JM acknowledged that several discussions at the PAG had already highlighted the risk associated with leaving a vacant meter, emphasising that such situations can result in significant customer impact. JM did not express disagreement with this point. However, JM proposed that a different approach could be considered. JM clarified that this idea had only

just occurred and was uncertain whether it was directly relevant to the current discussion or more broadly applicable. JM questioned whether, for the smart meter rollout, it would be possible to adjust the reading frequency. Instead of maintaining both monthly and biannual readings, JM suggested exploring the option of reading smart meters once every three months, or perhaps four or five times per year. JM noted that the exact frequency could be debated further. JM then mentioned reviewing a recent change under consideration and suggested seeking inspiration from the Scottish market in certain contexts. For example, JM was currently exploring the idea of classifying meter locations more specifically, such as distinguishing between internal, external, within property boundaries, and external meters outside property boundaries. JM explained that having this information would be valuable for the market, since a meter located inside a property boundary can be just as difficult to read as one situated inside an unoccupied property. Furthermore, JM questioned whether attempting to read a meter only once a year would ultimately create more challenges than it would resolve. Nevertheless, JM wondered if some of these concepts could be adapted elsewhere, particularly when reconsidering the existing reading schedule. AR stated that the second part of the metering obligations concerns smart meters. Internally, the team has considered whether a move to a monthly reading frequency for smart AMI meters might be feasible. AR noted that some data had been reviewed for a cohort of these meters. At present, AR observed that it may be premature to implement such changes, as the smart meter read hub is not yet operational and there is uncertainty around potential run rates over the coming year, as well as the delivery and implementation approach for phase two of the retail programme. AR recommended that the matter should be revisited in the months ahead, particularly from April 2026 onwards, and suggested that it remain on the agenda for further discussion as part of the ongoing metering obligations work.

- 6.4. In agreement with the earlier points, AB highlighted concerns from both a retailer and market performance framework perspective regarding internal vacant premises. Notably, the potential shift of bilateral cases to wholesale could significantly escalate the administrative burden. For example, when considering the 5,500 completed cases, complications often arise if wholesalers assert that premises are unoccupied, thereby placing unfair pressure on retailers to repeatedly initiate bilateral cases to confirm ongoing vacancy. Furthermore, AB stated that these challenges are exacerbated when meter readers are unable to access properties, resulting in no available readings or confirmation of occupancy. Consequently, the AB proposed integrating skip codes with CMOS to indicate a

verified vacancy and, in turn, minimise unnecessary bilateral processes. This approach would also acknowledge the reality that retailers may be subject to audits and would not misreport vacancies. Additionally, it was suggested that long-term internal vacant premises could be designated as "assessed temporarily until occupied," especially in cases where temporary disconnection is impractical due to shared supplies. On a broader scale, AB emphasised concern over the inclusion of such premises within the market performance framework, especially noting the prevalence of the issue in the Northumbrian region. To ensure fairness, the request was made to consider similar measures for non-market meters as well.

6.5. JL raised several considerations regarding meter reading frequencies. JL questioned the rationale for maintaining an annual read when a biannual meter is in place, suggesting a review of whether the current approach remains suitable. Regarding monthly meter readings, JL inquired whether it might be more effective to switch to a biannual schedule, particularly in instances where the internal read remains unchanged each month. This adjustment could allow for two annual checks without the need for monthly site visits. Furthermore, JL proposed evaluating the possibility of overlapping with new shadow MO2 data, as this might provide additional insights, particularly relating to EMR. JL noted the expectation that AMR readings should continue to generate results, even with internal meters. However, JL acknowledged the need to consider potential gaps in the process, particularly as wholesalers may encounter difficulties such as vacancies or a lack of customers to engage with for verification purposes. In such scenarios, although the retailer's responsibilities regarding AMR in the market remain, there may be obstacles to obtaining accurate reads, for example, due to faulty equipment. Thus, JL suggested that the bilateral process for vacant premises requires further examination, since historically there has been little market impetus to address bilateral procedures in these cases, leading to inconsistencies among wholesalers. JL concluded that, in situations where customer information is unavailable, wholesalers often do not investigate further, resulting in unresolved cases. Consequently, retailers and wholesalers may find themselves caught in a situation where neither party is able to progress, highlighting the need for a more definitive process to bring such matters to resolution.

6.6. JD briefly agreed with JL's points and highlighted ongoing issues with vacant sites in the market, now included in the new MPF. JD noted the codes haven't addressed managing vacant properties, especially with bilateral processes, and that PAG has discussed this extensively. JD stressed the need for the Committee to focus on finding solutions, suggesting

that RWG's work on skip data integration with CMOS may help. JD supported AB's view that the framework must distinguish between retailers actively trying to get meter reads and those who don't, since both are currently treated the same despite different efforts. JD called this unsatisfactory for a market in its eighth year and urged further discussion to resolve the lack of process, as wholesalers and retailers remain unsure how to handle these sites and often just expect a monthly payment request.

6.7. AR proceeded to the next agenda item, focusing on smart meters. Initially, AR provided an overview, highlighting the market composition: 1.27 million meters in total, with 131,000 smart meters, representing a 10.36% market share. A time series was presented to demonstrate installation trends. AR noted the analysis of a subset of 31,800 smart AMI meters present in CMOS at the start of January 2024. Despite some challenges in data retrieval, AR confirmed that 86% of these meters submitted at least one monthly read during 2024 and 2025, out of an expected 19 reads within the one year and seven-month period. Further, AR detailed the distribution of read frequencies: 25% of meters recorded up to 21 reads, the median stood at 32 reads (exceeding one read per month), and some meters reached up to 90 reads in the period. AR explained the analysis of settlement differences across R1 to R2, R2 to R3, and R3 to RF for the 31,800 meters. The blue data illustrated a 3.9% difference from R1 to R2, reducing to zero by RF, with a 5% difference observed from R1 to R3. In comparison, the full market exhibited a 1.1% difference from R1 to R2, rising to 1.9% from R2 to R3, then dropping below zero at RF. The R1 to R3 figure for the full market was 3.4%, slightly lower than for smart meters. AR emphasised the need for more robust, long-term monitoring, highlighting that the 31,800 meters represented a small fraction compared with the 1.3 million total meters and the 136,000 smart AMI meters, meaning data variability must be considered. AR summarised outstanding questions, including the timing of smart AMI labelling in CMOS and the challenge of requesting additional support for this data. Furthermore, AR proposed considering the implementation of flags in CMOS to identify meters not sending regular reads. AR also recommended evaluating the impact of different read types on settlement and reporting (e.g., W reads), as well as ensuring the timing aligns with the smart meter read hub delivery. Consequently, AR advised deferring the proposal for smart meter read obligations to the next financial year, pending further input from the group and observation of ongoing implementations. CD reported that a guidance document on handling smart AMI meters is required, as previously discussed. The process for resolving issues with smart meters must be clarified before

considering moving to monthly reads. CD noted that the market must be comfortable with these processes, and further detail will follow. Regarding the flagging of AMI meters not sending regular reads in CMOS, CD highlighted that the smart meter hub will generate reports identifying such meters. These reports will provide retailers with information on which AMI meters are and are not transmitting reads. CD suggested the hub is the appropriate platform for this rather than CMOS. JL suggested that the proposal concerning the definition of smart meter reading should be amended. It was noted that this issue requires resolution before further progress can be made, ensuring that all wholesalers are aligned and consistent in the market in their understanding of a smart AMI. There was discussion regarding the non-receipt of regular reads, with the view that this may indicate the meter is not enabled. This led to further debate on the definition of 'enabled' and 'not enabled', especially in cases where the meter has been inactive for some time or appears faulty. It was proposed that, under such circumstances, the meter should be reverted to a 'not enabled' status. It was agreed that this aspect warrants additional consideration. CD agreed with the points raised and stated that the guidance document would cover situations where a meter should be reverted to a traditional status. This would be included within the scope of the guidance document. CD confirmed that the MOSL team is currently reviewing the definition change, with particular attention to the commissioning aspect, and further updates will be communicated in due course.

- 6.8. The chair thanked AR for the update. Noting the Committee approved the recommendation proposed by AR.

## 7. Impact of Smart Meters on Operational Terms

- 7.1. The Committee received a presentation from CD emphasising the pressing need for a guidance document addressing the operational impacts of smart meters. Key points raised included repair and replacement processes, defect reporting timelines, and differentiating between monthly and six-monthly read meters.
- 7.2. CD informed the Committee that the guidance document under development might have a minor impact on other processes; however, any such effect could be managed by updating operational terms in sales as necessary. CD emphasised the urgency for this guidance, noting that various groups including the Metering Committee had expressed significant interest, and that producing this document was a priority for the year. CD referenced the smart AMI

definition recommendation and the ongoing work with the MOSL team on code changes, stating a minimum requirement for a guidance document to address scenarios concerning non-functioning smart meters, as well as implications for the MPF area. CD explained that the document would need to address the treatment of meters read monthly versus those read twice yearly. It was noted that CD and ES will prepare a draft for the next Metering Committee meeting, primarily covering the resolution of issues related to meters with reading difficulties. CD highlighted that a key topic emerging from recent discussions was the appropriate timeframe before a retailer should raise a defect for communication issues with smart meters, observing that current policies vary and no decision has been reached. The Committee will need to differentiate the recommended processes for monthly and six-monthly read meters. CD advised that if a monthly meter has not been read within the first two weeks of a new calendar month, retailers could be permitted to raise a request. For six-monthly meters, at least fourteen consecutive calendar days without a read might be allowed before escalation. Furthermore, CD noted the guidance document would need to define at what point and by what process a smart AMI meter should be reverted to traditional operation.

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- 7.3. RR expressed concerns regarding the proposed timelines for smart meter readings, highlighting that some meters which lose signal may self-correct within 30 calendar days. Consequently, it was noted that the suggested monthly and six-monthly read requirements could result in unnecessary fieldwork. Moreover, RR acknowledged the need for monthly meter reads but cautioned that, with the implementation of the smart meter hub, revising requirements to mandate monthly reads for all smart meters could lead to additional and potentially pointless site visits. For instance, RR explained that temporary obstructions (such as a car parked over a meter) may resolve themselves without intervention, and thus, immediate action may not be necessary. The importance of ensuring timely readings while preventing unnecessary work for retailers and wholesalers, including office and field checks, was highlighted. Furthermore, it was recommended that, once the smart meter hub is fully operational, a baseline should be established to inform future processes, rather than adopting new measures prematurely. Further, the Committee discussed the proposal regarding bilateral processes and the management of smart meter data. AB noted alignment with RR's position, explaining that each wholesaler is guided by their respective communication partner, which leads to varying approaches across the sector. AB suggested

that, if the agreed time frames are adopted and retailers follow these, wholesalers could acknowledge a bilateral and pause it with a specified end date, such as thirty days, before taking further action. AB also emphasised the benefit of allowing retailers to raise a bilateral early, as this could protect them from MPF charges, while wholesalers retain the ability to pause as needed. CD acknowledged AB's suggestion, considering it a practical approach to safeguard both wholesalers and retailers. CD further agreed with JM's proposal to revisit the three-monthly scenario the following year and supported a restrictive stance on reverting smart meters to 'dumb' status, specifying that this should only occur in limited scenarios. CD stressed the importance of wholesalers providing clear notice to retailers when such changes are necessary to ensure adequate time for meter readers to be re-engaged. JD agreed with the points raised, highlighting potential benefits from the smart meter hub, particularly in gaining valuable insights. JD proposed that the hub could introduce a period during which no smart data is received, followed by a thirty-day notification before expecting a bilateral to be raised. JD suggested reviewing the frequency of smart meter reads, noting that quarterly checks might be more suitable than monthly, which could be overly prescriptive and place unnecessary constraints on both wholesalers and retailers. JD also emphasised the need for further discussion regarding the scheduling challenges posed by sudden changes to meter status and the importance of managing these transitions carefully. Lastly, BK stated support for the hub flagging instances when smart metres fail to transmit, noting that there may be potential to link this to MPF. BK observed that directing large volumes of bilateral queries to wholesalers during mass maintenance would be impractical due to limited capacity on both sides. It was suggested that the hub should be developed to capture multiple scenarios. Also, switching back to dumb was not recommended, except in highly specific cases, due to field scheduling challenges and considerable costs when site density is low. BK concluded that the appropriate response depends on the scenario presented.

7.4. The chair thanked CD for the update.

## 8. National Metering Strategy Review

8.1. CD provided the committee with an update on the national metering strategy. The following points were noted:

- 8.2. CD reported that, of the Strategy 12 national meeting actions, several have been completed while five remain open and ongoing. The open actions focus on the smart meter rollout dashboard, sharing of related data, CMOS readiness, and wholesaler engagement. On guidance for large smart meters, actions have been taken, but ongoing monitoring of rollout and trends will be maintained, with potential to revisit and merge guidance, making use of the newly created dashboard. Regarding asset management standards, further engagement is required with wholesalers to discuss the management and maintenance of smart meters and networks, with the possibility of developing additional guidance if necessary.
- 8.3. CD noted that RWG guidance continues to progress, with communications for smart metering rollout nearing completion, which will support ongoing work including the smart meter read hub. Engagement with other RWG groups, such as the tariff group, is ongoing. Last year, reviews were produced on wholesaler charging structures, and some wholesalers are awaiting outputs from the smart meter read hub business case. It is proposed that data will be provided up to hourly free of charge, with potential charges for more frequent provision; this will be monitored as developments continue.
- 8.4. The final open action relates to the impact on traditional meter reading. CD highlighted ongoing engagement with Ofwat's review of the REC and open consultation, maintaining monthly contact to relay committee concerns, particularly regarding the impact on retailers. Progress on these actions will continue to be monitored and updates provided throughout the year.

## 9. Logger to Smart standard Document Review

- 9.1. The Committee reviewed the Data Loggers document as referenced in the [National Metering Strategy](#). AR requested that the Committee deliberate on its application and relevance. The following points were noted:
- 9.2. AR summarised the guidance document concerning the logger to smart process, highlighting its three main components. AR noted the importance of engagement, specifically that wholesalers should check programmes with retailers six months before any works, and that wholesalers must review CMOS data to identify meters due for replacement or requiring loggers. AR further observed that the document covers notifications to wholesalers and retailers both pre- and post-installation. He pointed out that, due to loggers often remaining external, meter exchanges can be cancelled or new ones added as necessary. AR referenced

the broader RWG data logging good practice guide, questioning whether this should be merged with the current document or if further consultation with RWG is needed. He reflected on the overall market awareness of the guidance, querying alignment with its principles, and whether hosts are actively using CMOS data to confirm logger arrangements with retailers and customers. AR also asked if the guidance contains any gaps or if additional information might improve it and raised the consideration of combining it with the RWG good practice guide. Finally, he questioned whether the process for installing data loggers on smart meters requires greater visibility or discussion at wider industry forums, such as the RWG smart meter rollout group. AB noted that, as RWG vice chair, one of their actions is to compare the RWG guidance with the metering committee guidance. AB will contact relevant parties, as there are plans to merge the committee and RWG documents to avoid duplication. RR noted that the guidance is regularly referenced, largely due to the volume of queries, and serves as a valuable resource for illustrating market standards. Although it does not change existing practices it remains important for benchmarking and data analysis. Additionally, RR reported that 200 metering jobs were cancelled last month following the unexpected presence of loggers on site, highlighting the magnitude of this issue. Currently, over 2,000 non-household meter replacements are completed each month. Nevertheless, numerous projects are placed on hold when unidentified loggers are encountered, frequently unassociated with retailers and sometimes involving third parties. Moreover, notification about logger installations remains unclear, which, in turn, complicates both workflow planning and communication. Consequently, if the owner of a logger cannot be identified, the meter may be replaced with a more expensive model or exchanged for a smart meter. This leads to further complications, namely, determining whether the costs fall to the retailer or the end customer. Nevertheless, when smart meters are installed and the guidance and notification processes have been properly followed, positive feedback is often received, although disputes can still occur. Overall, RR noted that the guidance is helpful and provides valuable support; however, it does not resolve all the challenges present in the market. Finally, AR enquired whether any additional steps should be incorporated towards the end of the process, especially if such steps have proven effective in practice. RR noted that the principal challenge lay in ensuring that third parties adhered to existing guidance. While this was relatively straightforward within the retail sector, it became more complex when external parties were involved. RR explained that when a customer engaged a third party to log meters or track processes or water usage, the customer might not always realise the need to notify the company, though the third party should do so. RR stated that a step

needed to be implemented to ensure that the company was informed and that CMOS records were updated when such situations occurred. Additionally, RR emphasised the importance of confirming the duration for which a logger had been present, as loggers sometimes remained connected but unused for years, leading to uncertainty regarding their current status.

9.3. JL observed that issues frequently arose not only due to notifications about loggers being active, but also when loggers were removed after wholesalers had informed retailers. The absence of guidance on managing situations such as not receiving notification about a logger or when a logger is removed after notification was noted. JL noted that uncertainty persisted when new customers were unaware of an existing logger, posing challenges for both retailers and wholesalers. It was anticipated that increasing smart meter exchanges would further complicate matters, particularly regarding costs when a logger was removed, and suggested clearer guidance was needed to establish responsibility. RR agreed and emphasised the importance of following the established guidance. RR clarified that when all steps had been followed, including attempts to contact relevant parties and documenting actions, responsibility for any removed logger would not fall to the retailer. Conversely, if guidance had not been followed or sufficient evidence could not be provided, reimbursement for the logger might be considered, although such cases remained rare due to adherence to the process. JL then queried the process followed by retailers, specifically asking about the necessary steps and evidence required. She questioned whether a bilateral process existed and what actions were expected under such circumstances. AR acknowledged that while the document specified notification and agreement within certain service level agreements, such as five business days, detailed instructions on communication methods or specific actions were not included, except for references to bilateral requests. JL concluded by noting the inconsistency in communication methods among wholesalers, with some preferring email, others opting for phone calls, and a few using bilateral forms. It was recommended that standardising these processes to ensure greater consistency across the industry. CM noted that there had been mention of requiring six months' notice. CM explained that, as discussed within the rollout subgroup, not all wholesalers are currently able to provide this notice; some are still working towards that ability, and it may represent a short-term challenge. CM also addressed Question 6 on whether the process requires wider visibility, observing that this had been a topic of discussion in the smart meter rollout subgroup. CM stated that consideration should be given to whether additional guidance is

needed and where it would best be situated either as part of the current subgroup's remit or within existing data logging best practice guidance. This, CM concluded, was still under consideration for future action. SF asked whether there is sufficient insight into how effectively trading parties are following the guidance in practice, or whether poor practices persist. SF suggested that a survey of trading parties could provide a clearer picture, gauging whether retailers are satisfied with the adherence to guidance and whether wholesalers believe retailers are meeting expectations. SF questioned if existing surveys offer enough information, or if another survey would be redundant. SF emphasised that improved guidance is only beneficial if it is actually being followed and highlighted the current uncertainty around this issue. The Committee queried the split between retailer-owned and third-party-owned data loggers, questioning whether the main issue stemmed from measurement limitations or activity on third-party devices. It was noted that some data may be available in CMOS, with a AR agreeing to review it. RR and JD indicated that they would request their team to review this matter as well. SM mentioned that the MOSL team is also conducting independent discussions with some of the third-party lobby companies. This approach, SM explained, is intended to provide insight from the lobbyists' perspective, particularly regarding how the communication channel operates on their end.

- 9.4. JD noted that guidance is not part of the official codes. While it is necessary to consider how this is emphasized, guidance serves as advice rather than enforceable rules. Matters requiring enforcement should be included within the code itself. There is some ambiguity regarding the interpretation and application of guidance. JD suggested supporting consistency so that everyone follows similar practices, which would benefit the industry overall. It is important to keep this distinction in mind. SBD noted that there may be an opportunity for MOSL to act as a signpost, guiding third parties towards available market information regarding wholesale plans. SBD highlighted that MOSL already provides such information on its website, suggesting there are no barriers to access. SBD questioned whether the dashboard was restricted to trading parties or if a public version exists, as it was originally intended to benefit customers and provide transparency on wholesale plans. SBD suggested that third parties could potentially access this information directly and engage with wholesalers as needed. SM acknowledged the point, emphasising the importance of making relevant information more visible and accessible, as some parties may not be aware of its availability. Both agreed to consider how this insight could be taken forward. JL advised that interest would likely arise once meetings with the third parties had been held,

particularly regarding the timing of installations. JL queried whether, for example, if a wholesaler had a backlog and had not yet processed or even seen the installation notification, the logger would still be installed, or if installation would be delayed until the wholesaler confirmed receipt and approval of the application. JL further noted that it would be useful to understand whether these scenarios were addressed from a communications perspective. AR responded, acknowledging that there remained considerable work to be done. AR stated that several matters required attention and confirmed an intention to engage with AB regarding the RWG guidance document. AR highlighted that a substantial element concerned third parties and agreed to consult with AS privately to explore possible actions. Additionally, AR noted that there appeared to be broader issues around communication and interaction with third parties, potentially extending beyond just data loggers. AR suggested that it might be beneficial to consult with CD as well to determine the best approach for moving forward.

## 10. CPW163: Smart AMI definitions

10.1 The Committee received an update on the smart AMI meter definition and discussed these points:

- ES discussed the importance of establishing a clear smart AMI definition to address market challenges, including differentiating between traditional and smart meters, supporting MPF Phase 1 KPIs, and preparing for future smart meter read hub code changes.
- The Code Change Committee (CCC) did not accept the definition for two primary reasons: (1) directly referencing PR24 could make the definition outdated if requirements change, and (2) the definition did not include smart meter performance aspects, such as transmission intervals and success rates.
- The Committee was presented with two options for revising the definition: Option A involves removing the explicit reference to PR24 and relying on the term "final determinations" to ensure the definition remains relevant in the future. Option B proposes eliminating both PR24 and "final determinations," instead referencing "Ofwat's requirements" to encompass performance metrics and support adaptability to future changes.
- ES requested that the committee review and vote on the preferred option, with the objective of establishing a definition that is clear, future-oriented, and aligned with

market requirements. The committee expressed a preference for adopting a streamlined definition: "fully commissioned and meets minimum performance requirements defined by wholesalers under their smart metering programmes," omitting explicit references to Ofwat or PR24.

10.2 The Committee stated that the definition of smart AMI should not be linked to performance metrics such as those in PR24 or Ofwat's requirements. The Committee suggested that all meters installed and enabled as smart should be classified as smart AMI, regardless of specific performance thresholds, to maintain consistent market reporting. SF and AS recommended streamlining the definition by centering it on commissioning and wholesaler program requirements, while treating performance monitoring as a separate issue. According to the Committee, performance obligations are addressed through other mechanisms (including price review standards, the smart meter read hub, and MPF), and therefore the code's definition should remain straightforward. The Committee observed that incorporating performance into the definition might lead to confusion, added administrative tasks, and potential penalties for retailers or wholesalers if meters temporarily underperform, for example due to signal loss. Support was expressed for using the hub and MPF for performance monitoring and initiating actions, rather than altering meter status definitions.

10.3 The committee agreed to maintain a straightforward definition: "fully commissioned and meets minimum performance requirements as defined by wholesalers under their smart metering programmes," omitting explicit references to Ofwat, PR24, or individual performance metrics. Sub-classifications and performance monitoring will be addressed through separate processes.

10.4 The Chair expressed appreciation to ES for providing the update.

## 11. CMOS SKIP Process Proposal

11.1 The Committee was presented with the proposal from the RWG Skip Code subgroup and the following points were discussed:

- JD reported that the Skip Code subgroup is assisting AR with CPW162. Initial consultation feedback indicated concerns about using around 49 skip codes from the RWG guidance, and several queries addressed whether more codes might be necessary. At the PAG meeting, members discussed the introduction of skip data

into the market and noted that its feasibility should be considered. For example, if 25-30% of data involved skips, mapping this to more than 50 skip codes could increase complexity and administrative workload. Participants questioned the purpose of skip codes in market processes, recognising that skip events often result in either a reread request or the raising of a bilateral, depending on investigation context. The distinction was drawn between skips that routinely lead to further action and those where market processes are missing, resulting in apparent inactivity despite resource expenditure.

- The proposal was split into two phases. The first phase, agreed with AR, involves the committee initially considering the eight main visit codes from the RWG guidance over the coming months. The task is to identify which codes reliably prompt a bilateral or reread request, and which do not. For example, 'Access' was singled out as requiring sub codes to clarify the specific issue, given current market uncertainty and ongoing performance queries. The second phase, outside the current scope of CPW162, will be addressed at a later date. The subgroup expressed preference for using as few skip codes as necessary, ideally based on the RWG's primary eight and sub codes where justified. Additionally, there was consideration of introducing a 'reaction code', prompted by recent consultations which suggested retailers' responses to skip codes may vary, including reread attempts and landlord contact for vacant sites. The concept is to capture retailers' intended next steps alongside the skip code, thereby enhancing data value and reducing complexity. The underlying aim is to distinguish between retailers who are not attempting reads and those who provide auditable evidence of multiple efforts, recognising the lack of current differentiation. Data item one was considered helpful, while further debate is required regarding data item two. JD noted that the subgroup sought to balance simplicity and administrative feasibility while extracting value from skip codes, expressing concern that a proliferation of codes would be counterproductive.

11.2 SF enquired whether a pilot programme had been considered, expressing an interest in understanding how the proposed approach would function in practice and emphasising the need for accurate recording. JD responded that a pilot could form part of the CPW162 discussion and noted that consultation with AR would be necessary. JD acknowledged that some interpretation of skip codes would likely persist, referencing recent examples where

meters had been assigned different skip codes by various contractors, resulting in uncertainty regarding the appropriate categorisation. JD further explained that limiting the number of codes, ideally grounded in RWG guidance, would enable retailers to make more informed decisions. While some ambiguity might remain, broadly defined skip codes could provide guidance for most scenarios. JD identified the primary value of skip codes as their potential to highlight market areas lacking viable solutions, with access-related skips serving as a recurring example. JD noted that such issues remain unresolved despite repeated attempts by wholesalers and retailers, suggesting that the proposed approach could specifically identify these persistent challenges for further attention.

11.3 There being no further comments, the chair thanks JD for the update.

## 12. CPW162: Cyclic Read Skip Codes-

12.1 Update to be discussed at the September Metering Committee.

## 13. AOB incl. Reflections on the Meeting

13.1 The Committee agreed to meet in person in October. There being no further comments the meeting was closed.

## 14. Actions from Meeting

Action	Owner	Completion by
CD and ES will prepare a draft for the next Metering Committee meeting, primarily covering the resolution of issues related to meters with reading difficulties	MOSL	15 <sup>th</sup> September 2025