Minutes of the Metering Committee Meeting 54

16 September 2025 | 09:30 – 12:45

Via MS Teams

Status of the Minutes: Approved

MEMBERS PRESENT

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

**Non-Voting Members of the Committee*

OTHER ATTENDEES

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

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APOLOGIES

Paul Heron	PH	Retailer Member	Kevin McCalliskey	KM	Wholesaler Member

1. Welcome, Apologies and Compliance

1.1. The Chair welcomed everyone to the Metering Committee (“Committee”) meeting and noted that apologies had been received from PH.

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 19 August 2025 as an accurate record of the meeting.

2.2. The Committee agreed that the following actions should be closed: A53_01 noting a verbal update would be presented later in the meeting.

3. Smart Meter Read Hub

3.1. The Committee received an update on the Smart Meter Read Hub and then reviewed the main points.

- The Smart Meter Read Hub initiative is now fully underway, having recently given a presentation to the Code Change Committee. The first gate approval is scheduled to take place the following day. SM advised that efforts are ongoing to recruit members for a subgroup within the Code Change Committee, which will assist in developing market codes for the second phase, with initial meetings expected in November. Concurrently, collaboration with CGI continues on the statement of work for the upcoming phase, drawing on requirements gathered from the Smart Meter Advisory Forum.
- The draft user agreement is presently being reviewed internally by MOSL’s legal team. SM indicated that once phase one is completed, the legal team will turn their attention

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to updating the market privacy notice, with this work planned for early 2026. CGI has supplied MOSL with technical documents covering aspects such as solution architecture, functional specifications, requirements traceability, and an overarching cloud design. However, these materials will not be shared outside the organisation for security reasons. Instead, details on integration and APIs will be released to trading parties incrementally throughout November.

- SM advised that the first steering group meeting is planned for 24th September, with invitations already distributed to those members who have been approved. Owing to the holiday period, the start of the user agreement consultation has been slightly delayed and will now commence either at the end of the month or in early October.
- The initial phase of software development is set to commence the following week, targeting the delivery of a proof of concept before Christmas. Testing by early adopters is scheduled for after the Christmas period, with assurance processes to follow in the next calendar year. SM indicated that the overall plan remains largely unchanged: the first phase will involve establishing a basic hub without CMOS integration, while the second phase will focus on incorporating CMOS integration and supplying aggregated data to industry bodies. Ultimately, the third phase could widen access to additional companies in line with MOSL's open data policy. The version featuring full CMOS integration is anticipated to be launched concurrently with CMOS in December 2026.

3.2. AB acknowledged the update and requested clarification regarding when trading parties, specifically wholesalers, would be able to access the technical documents issued by CGI to commence development activities. SM responded that, due to security considerations, distribution of these documents would not occur. Nevertheless, integration and API specifications are anticipated to be released prior to November. Additional updates will be communicated to the Committee in due course.

4. Strategic Metering Programme Update

4.1. AR presented the Committee with an update on the strategic metering programme, covering deliverables, ongoing consultations, data sharing initiatives, and coordination with stakeholders such as Ofwat, Baringa, and various wholesalers. The following points were noted:

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- There are currently fourteen deliverables underway, seven that have been completed, and two on hold, spanning initiatives including smart metering, enhancements to traditional metering, and overarching metering practices.
- The Smart Meter Read Hub, which functions as a data sharing platform, has been delivered and continues to operate effectively, with both phases currently in progress. The settlement review process is underway, and a new consultation is scheduled for next week. Additionally, a strategic review of settlement is ongoing; several workgroup meetings have already taken place, strategy development is advancing, and another consultation is planned within the same period. Market feedback will guide further enhancements to the strategy prior to its presentation to the panel for approval in November. This upcoming consultation follows an initial one held in May.
- AR noted that ongoing efforts are focused on gathering and including wholesaler data in the small meter rollout dashboard, with recent and upcoming meetings involving wholesalers like South Staffs and Southern Water.
- Of the five mandatory deliverables, all remain in progress except for the National Metering Strategy Review, which has been completed. Data sharing and CPW162 continue to be primary areas of focus, with additional updates to be provided later in the meeting. Regarding the "should" deliverables, the wholesaler asset maintenance maturity assessment, led by Ofwat and Baringa is ongoing, as are updates to interim data sharing guidance. Work on continuous flow definitions will recommence following the full implementation of the Smart Meter Read Hub. AR reported that transfer reads (CPW159) and meter read obligations are being addressed, though some components have been deferred until next year. For the "could" deliverables, the review of consumption in vacant properties has concluded, while consultation with Ofwat on the cost-effectiveness of meter reads continues. The evaluation of guidance for transitions from loggers to smart metering is underway and may be incorporated into the RWG good practice guide, with further process changes anticipated in December.
- Discussions on annual and smart meter read frequencies have concluded with the decision not to implement changes to annual read frequency at this time, and to defer smart read obligations until the hub attains full operational status. Guidance documents reflecting the revised smart AMI definition are currently being developed for committee evaluation. Efforts are also underway to address 'no flow' meters, incorporating retailer feedback and planning for their integration into the dashboard. Additionally, guidance pertaining to logger-to-smart metering transitions is under review, with consideration being given to its consolidation with the RWG good practice guide.

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4.2. SF offered an additional comment concerning the REC response. SF acknowledged that while the relevant link was included, the committee had previously expressed considerable concerns about the cost implications of smart meters, particularly in relation to traditional meter reading and broader service costs. SF emphasised that this issue was a central aspect of MOSL's response, which highlighted the potential for smart meters to significantly affect various cost areas, not limited solely to staff expenses for traditional meter readers. It was also noted that fully evaluating the impact at this stage remains difficult. SF recommended that this matter be incorporated into the current review process but suggested revisiting the topic during the period between this REC review and the next, anticipated within three to five years. Additionally, SF proposed that intermediate reviews may be warranted due to ongoing uncertainties surrounding the comprehensive impact. Finally, SF observed that this subject has been frequently discussed in recent committee meetings.

4.3. There being no further comments the chair thanked AR for his update.

5. SMART AMI Definition CPW163

5.1. The Committee reviewed the proposed guidance document contents and were invited to suggest immediate changes. ES highlighted the following key points:

- The final draft of the Smart AMI definition mainly emphasises commissioning and wholesaler programme requirements. To maintain adaptability, the scope intentionally excludes references to performance measures or PR24/final determinations. Furthermore, ES indicates that "smart metering programmes" has been revised to "smart metering policies" for improved clarity and emphasis.
- The definition requires that meters deliver granular consumption data in line with the relevant data sharing standards or any future code amendments and also meet the minimum performance standards specified within each wholesaler's smart metering policy.

5.2. SBD observed that the requirement mandates the delivery of granular consumption data in compliance with the granular data sharing standard specification, or any subsequent code requirements. SBD further noted that while an issue for delivery may be established and the IT team might approve the current methodology, there remains a possibility of future changes should the underlying code or infrastructure be updated; consequently, this arrangement should not be regarded as permanent. SBD also inquired whether similar scenarios had been encountered by others, and remarked that if wholesalers are satisfied with the arrangement,

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significant concerns may be mitigated. Additionally, SBD highlighted a primary concern regarding the second supplemental requirement, which pertains to minimum performance standards defined individually by wholesalers within their smart metering policies. SBD pointed out that if fifteen wholesalers each implement their own smart metering policies, or even make minor adjustments to those policies, the requirements for smart meters would depend on each wholesaler's standards instead of following a single universal format. SBD asked whether this understanding was accurate, explaining that the initial purpose of creating R-Mex was to avoid being subject to the diverse service delivery rules set by different wholesalers. To illustrate, SBD mentioned that, under such conditions, they frequently had to modify their approach to comply with individual wholesaler policies. In situations where each wholesaler like SES, for example adopts a unique or incomplete definition of smart metering, the requirements would be set according to those varying definitions. SF clarified that the primary purpose of introducing point two was to ensure that a smart meter is only entered into CMOS once it has been fully commissioned and is operating in accordance with all defined requirements. Specifically, "functioning as intended" must comply with all stipulations outlined in PR24. The committee underscored the importance of this approach: meters should be recognised not simply upon installation, but when proven to meet all operational standards. Additionally, SF noted the necessity of balancing the level of detail within the code; excessive specificity could introduce unnecessary complexity. Accordingly, the committee agreed that direct references to PR24 may present challenges as future price reviews are implemented. As a result, there was a deliberate effort to keep the requirements simple, prioritising that meters are properly commissioned. SF also clarified that as long as meters function according to wholesalers' policies which themselves need to follow PR24 and any future price reviews the system will remain efficient. If a wholesaler's policy fails to meet price review standards, it is up to the wholesaler to resolve the issue, not the code. The goal is to avoid overly detailed specifications that could introduce unnecessary complications, while still ensuring meter commissioning and policy compliance. In relation to granular consumption data, SF indicated that incorporating the phrase "or subsequent code requirements" is intended to ensure meters provide data consistent with current standards, while accommodating future regulatory developments. This strategy is designed to future-proof the requirements, ensuring meters remain compliant with evolving standards, are properly commissioned, and operate in accordance with price review obligations.

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5.3. RR agreed with SDB's perspective and emphasised SF's concern about the risks associated with being overly prescriptive. RR noted that establishing strict definitions at this stage could restrict adaptability and potentially enforce a singular approach. Permitting the process to continue with the existing 'hub' arrangement may allow for future adjustment of definitions if necessary. RR further remarked that, given the current uncertainties regarding the final commissioned state and its compliance with Ofwat PR24 requirements, the presently agreed approach appears to be the most pragmatic course of action. Significant work remains to establish greater clarity, as Baringa is working to develop a consistent definition; otherwise, there is a risk that different wholesalers will interpret key terms inconsistently. Establishing consistency across the industry was recognised as a crucial initial step before setting a more precise definition. The goal is to make sure that any installed smart meter is accurately recorded in CMOS, as not doing so offers no benefit. JL supported RR's points and added that 'fully commissioned' remains ambiguous without a proper definition. JL highlighted the need to focus on cases where processes fail the so-called 'unhappy path' and to clarify what it means for a meter to not be fully commissioned in those situations. JL stressed the value of clear definitions for retailers, enabling engagement with wholesalers about issues such as meters marked as fully commissioned despite no meter readings being received. Without consensus on definitions, effective discussion and implementation of necessary market changes is challenging.

5.4. SF noted that the primary objective of the initial point is to deliver comprehensive consumption data as specified by the relevant standard. SF further acknowledged ongoing discussions concerning the required level of detail for determining when a meter can be regarded as fully commissioned, as well as ensuring compliance with minimum performance criteria aligned with applicable policies. SF recommended that the Committee refrain from making the guidance unduly prescriptive, especially in consideration of RR's earlier comments regarding the code. SF suggested that if issues arise in the market, such as disagreements between wholesalers and retailers over whether a meter is fully commissioned the Committee can revisit and clarify the code as needed. SF emphasised the importance of monitoring for genuine problems in the market and revisiting the approach if required. JL agreed and pointed out how helpful it is to understand the different policies set by retailers. JL mentioned that a major challenge comes from assisting customers who work with several wholesaler regions, which often requires explaining which specific policy applies to each meter such as those managed by Southern or Thames Water. JL emphasized being well

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prepared in these discussions so that customers are just as clear about the policies as the committee members. MT concurred that the existing wording is appropriate, while acknowledging challenges arising from varying wholesaler policies in managing cross-regional customers. MT proposed creating an additional document through which wholesalers could declare their minimum performance standards, thereby promoting greater sector transparency. Additionally, JD raised concerns regarding excessive prescriptiveness in smart meter definitions and pointed out practical challenges including instances where new AMI meters are not yet transmitting data. JD questioned whether such meters should be defined as smart prior to becoming operational and further remarked that a temporarily non-transmitting AMI meter should not automatically lose its “smart” designation unless it is physically replaced. JD recommended considering market-wide guidance or conformity measures to ensure consistency for both wholesalers and retailers and advised careful deliberation on definitions and terminology as discussions progress.

ACTION 54:1

5.5. ES and JD engaged in a discussion regarding the guidance document intended to accompany the smart AMI definition. ES stated that the current draft, prepared by ES and CD, clearly outlines the need for this guidance and its alignment with the definition. The document addresses key issues including scope, meter classification within CMOS, criteria relevant to different meter types, and requirements regarding market data accuracy and performance. It also references PR24 standards, such as the 85% completion benchmark and the requirement to deliver 42 annual data packets. ES reported that the standalone document now includes bilateral route resolution, clarifying when to initiate a B5 or reclassify smart MI meters in CMOS. Governance will involve ES and the Metering Committee, who will address ownership and out-of-scope issues. JD highlighted the need to balance retailers' requests for bilaterals with wholesalers' feedback that some issues are temporary, suggesting deferral periods for B5s. ES confirmed wholesalers may defer B5s when immediate action isn’t possible. A draft scenario list outlining reclassification outcome will be included. ES asked for two or three Metering Committee members to join a working group; JL and BK volunteered, while RR, MT, and JD offered to have other team members participate due to limited availability.

5.6. ES presented a scenario flow chart to the Committee, intended as a visual guide for managing AMI meter classification and resolving related issues. The process commences with the B5 bilateral form and leads participants through various decision points to ascertain whether

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reclassification of a smart AMI meter in CMOS is required. ES observed that the chart clearly defines the respective responsibilities of parties such as retailers or wholesalers and features a deferral time box for logging temporary issues to be reviewed at a later stage, rather than prompting immediate reclassification. The flow chart assists users in identifying appropriate moments to escalate concerns, defer actions, or proceed with reclassifications, which fosters uniformity in market practices. Furthermore, ES advised the inclusion of this diagram within the guidance document, subject to the Committee's approval. The Committee expressed their satisfaction with the suggested scenario flow chart.

5.7. ES presented the upcoming steps and corresponding timeline. Although multiple dates were referenced, emphasis was placed on forming the dedicated team for scenario development ahead of the next Committee meeting. ES advised that there is optimism that the definition will receive approval during this cycle. ES highlighted that implementation is planned for later in the year, acknowledging tight deadlines but expressing confidence that, with clear communication, the definition will be finalised. Appreciation was extended to all contributors and volunteers, with direct follow-up to be provided regarding any ongoing participation.

5.8. The chair thanked ES for his update.

6. RWG Smart Meter rollout good practice guide

6.1. CM provided the Committee with an update on the RWG Smart Meter rollout good practice guide, before discussing the following points:

- CM announced that the completed Good Practice Guide (GPG) has been forwarded to MOSL for their approval, with plans for it to be published before the end of the week. CM also encouraged Committee members to monitor its upcoming release.
- The GPG defines specific ownership of customer communications between retailers and wholesalers, encompassing initial notifications, pre-installation notices, and post-commissioning updates. This framework is intended to prevent duplication and inefficiency, particularly for customers operating across multiple regions.
- The guide includes a template data sharing agreement, developed by MOSL's legal team, to enable retailers and wholesalers to securely exchange customer data for specified objectives. This template is intended to resolve concerns raised in previous group discussions.

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- The RWG group identified the need for additional guidance on exceptions such as critical water users, customers with smart loggers, multi-region customers, hard-to-access meters, and scenarios involving delayed operability, with a follow-up meeting scheduled to develop this content.

- The RWG group recognised the necessity for further guidance addressing exceptions, including critical water users, customers equipped with smart loggers, those operating across multiple regions, meters that are difficult to access, and situations where operability is delayed. A subsequent meeting was arranged to develop this additional content.

- CM reported to the Committee that the RWG group is currently collaborating with the strategic panel to investigate potential approaches to ownership and funding for a National Information Hub. This follows MOSL's investment board's decision not to provide funding for the project, with SF specifying that the refusal was due to budgetary constraints rather than a lack of endorsement.

6.2. AS observed that responsibility for defining the benefits of smart metering appeared to fall to individual retailers, even though earlier discussions had outlined a strategic baseline service encompassing hourly readings, alerts for high consumption, and continuous flow monitoring. AS queried whether there was an appetite for standardising this minimum service across the sector or if it would be left to retailers' discretion. In response, CM explained that the good practice guide draws upon the national metering strategy and its suggested minimum services. CM noted that while the guide presents recognised best practices, it intentionally refrains from being excessively prescriptive so as to preserve competitive opportunities amongst retailers. CM further clarified that the guide references the service recommendations of the national strategy, and that the slides were intentionally general because the smart meter read sharing hub is considered crucial to enabling the delivery of these services. CM pointed out that some retailers may be unable to offer these services until such enabling systems are established.

6.3. RR highlighted that the lack of a geographically structured rollout for the smart meter programme introduces challenges, particularly in relation to the one-month notification period, which may not be appropriate for non-geographical deployments. RR also noted that the guide goes beyond the minimum requirements specified in the code an improvement in principle, but potentially not suitable in all scenarios. RR emphasised the need for flexibility

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should the programme deviate from its intended course. Additionally, RR observed that certain aspects of the guide do not align exactly with the code's guidance, underscoring the necessity for allowing modifications to the programme to maintain efficient implementation. In response, CM acknowledged that some suggestions in the guide, particularly those concerning the D1 notification template, surpass the code's stipulations. CM pointed out that this was a key issue raised during discussions with trading parties. CM clarified that providing more detailed information at the initial notification stage enables retailers to identify and contact customers more effectively and rapidly. CM agreed on the importance of maintaining flexibility and acknowledged the significance of an efficient programme rollout, noting that the group had aimed to balance best practice with practical execution.

6.4. The chair thanked CM for the update.

7. CPW162: Cyclic Read Skip Codes

7.1. The Committee was informed through a verbal update about the recent outcomes discussed by the Code Change Committee. ES delivered a concise summary of CPW162, highlighting that the associated consultation is predominantly qualitative. ES described ongoing market difficulties stemming from trading parties submitting skip codes that are anecdotal and tailored to individual systems, which impedes the formation of consistent patterns and hinders effective problem-solving. Consequently, CPW162 proposes the creation and mandatory use of a standardised list of skip codes to improve accuracy across the market. Initial actions involve the introduction of data items A and B to support this transaction, with the intention to embed the process within CMOS. The main goal of CPW162 is to establish a definitive skip code list and to ensure the necessary infrastructure for precise data submission into CMOS.

7.2. ES conveyed that feedback from wholesalers, retailers, and CCW was generally balanced, with broad agreement on the necessity for new skip code values to be maintained within CMOS. The main reservation centred on the risk of oversimplification, though it was not anticipated to significantly affect the proposed solution. CPW162 is considered to address key ongoing issues, but ES noted that several matters remain outstanding. ES is in the process of integrating external feedback where feasible or otherwise accepting certain constraints. Although a trial period was proposed, it was ultimately rejected due to the inflexibility of making amendments to CMOS. The move towards central standardisation will see contractors

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retaining their own lists, which has prompted some concerns regarding the level of detail; the RWG is currently working to refine the list. Currently, skip codes must be submitted within five business days, with proposals under consideration to extend this to fifteen days. Persistent challenges include ensuring alignment, managing system impacts, accurately populating data, and navigating the complexities of the household market. ES recognised the importance of increased transparency around costs and has presented an updated solution. Under the new arrangements, users must now select from a prescribed list of skip codes, with free-text entries no longer permitted, and it is anticipated that service level agreement timelines will be lengthened.

7.3. The Committee considered the proposal to extend the timeframe for submitting a skip code. MT questioned the justification for lengthening the submission period, expressing the opinion that, once a skip or meter read is recorded, it ought to be promptly entered into the system. MT was uncertain why an investigation would be required prior to uploading the skip but was open to further discussion on the topic. ES noted that a five-business-day window might not allow retailers sufficient time to receive and investigate a skip, suggesting that a more practical period would be 10 to 15 business days. ES clarified that this proposed extension would simply allow retailers additional time to address the skip, without impacting assessment or billing processes. JD provided additional context, highlighting two key points. Firstly, JD concurred that investigations should not delay the uploading of skips, as the skip could be uploaded immediately and any necessary investigation could follow. Secondly, JD referenced previous conversations about the possible introduction of a separate reaction code, though this idea had been set aside as it was beyond the current scope. JD explained that, while a skip code records the occurrence of the event, a reaction code could indicate how the issue was addressed but acknowledged that such a system might complicate processes for retailers. JD also stressed the importance of maintaining focus on meter reads, which are usually straightforward, whereas skips can be more complex. BK agreed with JD, suggesting that the correct course of action depends on the type of skip. Where a reread could be quickly triggered and a meter reading obtained, recording the new meter read might be preferable to logging the skip. BK considered it potentially redundant to record both if the issue had already been resolved, particularly in cases where skips were caused by access issues that could be swiftly addressed. BK was inclined to support the direct uploading of skips unless a reaction code system was introduced but cautioned that requiring additional data could place a greater burden on retailers and increase costs for the market.

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7.4. JL remarked that it is commonly assumed all retailers have system integrations in place. However, JD pointed out that medium-sized and smaller retailers may lack the necessary staffing levels, particularly when the same personnel are responsible for both meter reading and managing skips. Such organisations may require additional time to input data into their VI, especially as not all retailers have access to HVI. AR explained that the initial approach was to apply identical service level agreements and timeframes to both skips and meter reads. Yet, market feedback has shown that skips generally demand more effort and interpretation compared to meter reads, which are frequently automated and processed more quickly. As a result, MOSL is reassessing whether the five-business-day timeframe used for meter reads is appropriate, as this period may be too brief and there may be situations where either alternative information or quicker responses are needed. Thus, the suitability of the original five-business-day deadline is now being reconsidered in response to this feedback.

7.5. ES advised the committee that the estimated timeframe for installation or system alignment regarding CPW162 ranges from zero to six months. Nonetheless, Ofwat will not approve implementation until spring 2026, with the roll-out scheduled for December 2025. ES highlighted that market participants would have a nine-month period to bring their systems into alignment, which should be adequate. ES further clarified that, in response to concerns raised by CGI, the original intention to link skip data with existing CMOS transaction meter read dates was reevaluated. CGI had warned of possible confusion and difficulties in syncing with bilateral hub mechanisms. Consequently, the revised recommendation is to introduce a standalone skip date transaction within CMOS, which is expected to increase training party costs by around £30,000 (with final figures yet to be confirmed). This change aims to create a clear separation between meter read and skip transactions, thus minimising ambiguity and reducing the need for modifications to market codes that reference T105. AR suggested that, rather than adapting T105 and altering the processing of meter read dates, the preferred approach is to establish a separate transaction that incorporates the skip code, skip date, and potentially a text comment field. This method is considered more straightforward, as it avoids extensive changes to market codes and keeps the two processes distinct. AB recommended adding a filter to the meter reading screen, enabling users to display reads, skip codes, or both, mirroring the existing filter for retired reads.

7.6. ES informed the Committee of upcoming activities, indicating that the streamlined skip codes list, prepared in collaboration with AR, would soon be distributed to the RWG for review and approval prior to the next RWG meeting. Furthermore, a specialised team, comprising

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representatives from both the Metering Committee and RWG, is being formed to support the finalisation of the skip codes list ahead of the CCC paper day. CGI is scheduled to undertake a thorough Detailed Impact Assessment (DIA) to estimate costs and identify any required adjustments to the proposed solution, thereby promoting greater transparency in the cost breakdown. All modifications, including the introduction of a new skip code data item, will be recorded in the DRR, with trading parties to be duly notified. The intention is for the list to be endorsed and prepared for CCC consideration, aiming for implementation in December of the following year, which would allow for at least nine months of market alignment. JD requested that members of the Metering Committee be invited to the next RWG call concerning skip codes, emphasising the advantage of involving a broad range of trading parties in the review and revision process. JD also offered to share presentation slides with ES and the Committee when they become available. Noting the invitation to participate in the working group, both JL and JD expressed their interest.

7.7. JL questioned whether the transaction under discussion represented a single standard transaction or if a T core was also involved. This distinction, JL noted, could be important for other retailers who might enquire about costs or additional charges. JD responded, presuming that since it was not a 105 transaction, a separate transaction would be necessary for removal, drawing a parallel with how 105s operate. AR agreed to investigate further, explaining that the current design included removal as part of the meter read transaction, but would clarify with CGI if an additional transaction was required. JD advised considering the structure of 105 transactions, suggesting that since they do not impact settlement, there could be an opportunity to simplify the process. JL proposed that, if cost was a concern, the transactions could be consolidated into a main transaction. Subsequently, AS sought confirmation on whether the endorsement of the list by RWG and the metering committee would suffice in the absence of a formal consultation, questioning if this approach would secure the necessary market support once published. AS highlighted that an alternative to formal consultation could involve transparency and inviting market feedback without an extensive process. Jamie appeared to concur, and AS invited further opinions on the matter. JD emphasised the importance of keeping the skip code list up to date, suggesting that a dedicated group should review and manage the list to ensure its relevance, and that consultation parameters would best be guided by MOSL. AS then expressed, concern about the potential burden on the market if the skip code list were frequently updated, warning that continual system changes would be unwelcome. AS advocated for stability, recommending a

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limit on the frequency of changes, similar to the approach taken with MPF and PAC, to prevent unnecessary system disruption and maintain market confidence. JD fully agreed, especially regarding the need for clear rules about when and how changes may occur, stressing that frequent updates should be avoided. JD concluded that any process for changes to the list should be carefully balanced and noted that further discussion on this topic was still required. AR indicated that the team had considered omitting a definitive list from CST 0301 to allow for future amendments without necessitating a full chain proposal each time. While any modifications would still require appropriate governance, presentations, and stakeholder engagement, the comprehensive chain process may not always be required. There was internal discussion about whether this approach was optimal, as utilising a chain proposal ensures multiple checkpoints, market consultation, and a thorough assessment. AR noted that providing detailed information within CST 0301 could give trading parties greater assurance of a rigorously reviewed process. It was suggested that, if the list is accurate from the onset, updates would likely be infrequent possibly only two or three times per year limited by the established code system release schedule in May and December, making more frequent updates impractical. AR emphasised the importance of the upcoming presentation from ES, as the objective is to ensure the list is robust, minimising the need for ongoing changes and supporting the broader market. This principle also applies to related areas such as RWG, MPF route resolution, audits, and evaluating the suitability of skip codes for all anticipated future requirements. JL further commented that, given the maturity of current market definitions, the expectation is that most skip codes can be definitively categorised, and where new instances arise, they could be guided by the RWG, ensuring alignment with existing definitions. This ongoing guidance on data mapping would enhance consistency across the market without necessitating a technical change. SF added to the ongoing debate regarding whether a full consultation on the individual skip codes should be conducted. SF noted that, in the absence of a formal consultation, it would be beneficial for CCC to communicate to the wider market that this code change is underway. Trading parties should be informed that, if they feel strongly about the matter and wish to contribute, there are avenues available for engagement via the RWG. SF emphasised the importance of ensuring that those trading parties wishing to participate are made aware of the opportunity, rather than the process being handled solely within the RWG and only communicated to the market at a late stage. SF suggested this approach could serve as a middle ground between the current process and a full consultation and highlighted that it could mitigate potential challenges from CCC,

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particularly concerns that some trading parties who do not routinely engage with the RWG might be taken by surprise by the changes.

ACTION: 54_3

7.8. The chair thanked ES.

8. CPW130 - Transfer read estimated reason codes

8.1. OB updated the Committee regarding CPW130, noting that it was raised to resolve the issue of inaccurate reason codes when estimating meter reads during customer transfers. Previously, the majority of estimated reason codes defaulted to 'NA', which was often misinterpreted as either 'not applicable' or 'not attempted', rather than its intended meaning of 'no access to premises'. In response, CPW130 implemented an updated set of reason codes for estimated transfer reads within CMOS, drawing from the standard skip code list established by the RWG and Metering Committee. This initiative was designed to enhance the accuracy of skip reasons attributed to estimated transfer reads. The Committee was presented with comparative graphs illustrating actual and estimated transfer reads for the 2023–24 and 2024–25 periods. Both periods recorded similar overall transfer read volumes around 45,000 in 2023/24 and 40,000 in 2024/25 yet the decline in the number of estimated transfer reads was only marginal. An analysis of the use of estimated read reason codes has shown a significant change: the NTA code ('No Transfer Read Attempted') has been mostly supplanted by the CT code ('Customer Transfer Read Incorrect or Not Provided'). Together, these two codes now represent almost 80% of all codes applied to estimated transfer reads. Additionally, the analysis also revealed that only 17% of reported damaged meters led to a repair request, while, on average, bilateral requests were initiated for just 5% of cases where a corresponding reason code existed. In essence, the CT code has effectively taken the place of NTA, indicating that retailers are increasingly likely to seek transfer reads from customers. However, customer-provided transfer reads are frequently missing or inaccurate, which calls into question the efficacy of requesting customers to supply these reads when there is little likelihood they will be submitted correctly or on time. OB remarked that there is a clear discrepancy between estimated reason codes and the number of bilateral requests raised, with only 5% of such requests being initiated. This figure remains inadequate, even after allowing for potential recording inaccuracies of up to 20%. OB associated this issue with CPW159 and suggested it should be taken into account when exploring potential solutions.

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8.2. RR highlighted the significant statistic that only 5% of bilateral requests were raised in relation to the identified issue. Referring to the initial graph illustrating DAM meter damage, RR questioned whether every instance shown had resulted in a bilateral being raised and if each case was appropriately matched with a corresponding bilateral request. RR went on to clarify that, despite the relatively low number of cases on the DAM graph slide, it would be reasonable to expect that all such instances would trigger a bilateral. Conversely, RR noted that cases falling outside this category would not necessarily warrant a bilateral request, as the root cause might not involve meter damage but could instead relate to issues such as access problems or customers failing to provide a meter reading. RR stressed the need to distinguish between physical faults with the meter and situations arising from access difficulties or customer non-compliance, which do not require technical intervention. RR observed that, while the 5% figure was not necessarily unreasonable, it could signal a need to pay closer attention to the follow-up actions being taken. RR raised the question of whether the root cause was genuinely the customer's inability to provide a meter read or if other factors might be at play. OB responded by clarifying that the primary codes in question relate to issues such as meter damage or burial—circumstances under which a bilateral request would typically be expected. OB pointed out that, although a customer may report the issue to their retailer, it often appears that a bilateral is not subsequently raised. In reality, it is more probable that most of these codes have been logged by meter readers themselves, who, upon identifying problems such as a damaged meter, did not proceed to raise a bilateral; only 17% of such cases have resulted in action. OB also explained that, within the coding system, a 'customer read' currently denotes an estimated reading for which no further action is required. Similarly, 'NTA' (No Transfer Read Attempted) indicates that no transfer read was performed, again requiring no further steps. OB suggested that this information should be incorporated into the presentation slides, noting that the different reason codes relate to distinct sets of data, so the graphs are not directly comparable. OB highlighted that meter damage comprises a relatively small portion of the overall data about 200 cases of which only 17% have led to a bilateral being raised.

8.3. JD emphasised the significance of the upcoming transaction proposal, stressing the need to strengthen procedures within the market. JD recommended that an analysis be conducted on the reason codes linked to cases where a visual transfer read was not acquired. In particular, JD proposed examining how many such meters subsequently receive a visual read within the previous month or over a six-month period, depending on whether the meters are on a

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biannual or monthly reading schedule. While JD recognised that this approach would not encompass 95% of cases, he highlighted the substantial amount of time invested, especially with newly installed meters, in verifying the accuracy of the reason codes received. For instance, there are instances where reason codes suggest a meter is damaged, even though JD believes it should have been possible to read the meter initially. This is especially problematic with transfer reads, as uncertainty arises when CMOS lacks sufficient information. JD presented this idea as a suggestion for future consideration, noting that such analysis could prove useful for monitoring performance after the implementation of the new change proposal. He considered that identifying how many meters are eventually read might question the validity of the original skip code, though he acknowledged this would not address the majority of cases. JL supported these views, recommending that it would be beneficial to examine, in cases where action is not taken due to a specific reason code, how many meters remain in a long unread status, given the substantial impact this can have on customers. JL suggested that determining the proportion of meters classified as long unread would provide a meaningful measure of the effect on the customer base. RR agreed and added that it would also be valuable to distinguish how many of these meters are smart meters. RR observed that smart meters, which supply monthly readings via CMOS, are unlikely to result in significant fluctuations in final bills or transfers. However, for meters left unread for extended periods, the resultant estimation could be considerable. RR believed that making this distinction would be highly beneficial. JL further pointed out that long unread meters are most likely to generate complaints to CCW and are a primary concern for the Metering Committee, which is focused on reducing the incidence of such cases. JL observed that lowering the number of long unread meters would allow for a more accurate assessment of customer impact, as these situations often lead to substantial catch-up reads and, depending on the retailer’s billing practices, potentially higher consumption charges. JL reiterated that addressing these issues is a central objective.

8.4. The chair thanked OB for the update.

9. CPW159 Estimated Reads

9.1. The Committee received an update on CPW159 Estimated Reads and was requested to approve the proposed solution. OB presented a concise overview of the background and the underlying issues that necessitated the proposed change, followed by a summary of the recommended solution for consideration. Committee members were asked to agree or

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confirm that the proposed solution should be submitted as a recommendation to the Code Change Committee. OB explained that CPW159 aims to resolve ambiguities in the codes relating to estimated transfer read practices when customers switch their water and wastewater supplier. The primary concerns identified include unclear guidance regarding the use of estimated transfer reads, instances where retailers shift the responsibility for obtaining reads onto customers, and insufficient remedial actions when issues are detected. It was highlighted that there are risks to customer safety if individuals are required to submit readings themselves, and the current process may result in billing inaccuracies and potential bill shock due to estimation errors. Data suggest that approximately 70% of all transfer reads are currently estimated, and there is evidence of inappropriate trading party behaviour concerning customer reads, with limited effort made to obtain actual readings. OB outlined the proposed solution, beginning with the intention to remove the safety point, which would be addressed in detail subsequently. The first aspect of the proposal involved clarifying within the codes that estimated transfer reads should only be utilised as a backstop. The second element concerned customer agreement, with a proposal to ensure that when a customer read is requested, there is a logged agreement either written or verbal with the customer. Currently, the codes simply require agreement, this change would require a recorded agreement to confirm the customer is willing and able to take the transfer read, as well as to provide an auditable record.

9.2. OB and JD addressed Castle's approach to transfer reads. OB explained that customers are encouraged, via communications, to provide a meter read through the portal if possible, as this is highly beneficial. However, Castle's default is always to attempt to obtain a transfer read themselves. OB queried whether simply inviting the customer to provide a read (while still sending their own meter readers) fulfils the requirement for customer agreement, or if a specific logged agreement is only necessary when the company exclusively relies on the customer for the read. JD clarified that a logged customer agreement is only required when there is reliance on the customer to provide the transfer read. If the organisation arranges for its own meter readers but also invites customers to submit reads, there is no need for a logged agreement. Such an agreement is only necessary where the company depends on the customer to supply the read, and this should not be implied. Furthermore, if the estimate reason code used is that the customer did not provide the read in time, there should be a written agreement from the customer confirming their commitment to supply the read.

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9.3. OB informed the Committee about point 3, the item recommended for removal. This point will not be advanced, as it was previously observed that the requirement relating to customer reads and assurances of safety could potentially introduce liability concerns. The main justification for suggesting its removal lies in the risk of liability; the Committee does not wish for any incidents affecting customers to be attributed to retailers who have indicated the activity is safe, and similar ramifications. Additionally, consultation responses indicated that when asked how safety is ensured for customers undertaking a read, the majority if not all respondents confirmed that they address safety within their customer communications. This suggests that such practices are already standard, and therefore, there is no necessity to formalise this requirement further. OB advised that It was also raised at the previous meeting that there is a lack of evidence to suggest this is a genuine issue; there have been no reports of customers experiencing health and safety problems while taking a read, such as injuries from the meter lid. There is no indication that this is a problem within the market. Given that retailers already communicate safety measures and there is no reported benefit to enforcing this requirement, it is proposed that the safety consideration be removed from the solution. OB asked if there were any objections to removing the point; in the absence of dissent, the Committee agreed to its removal. This rationale will be included in the DRR as justification for omitting the safety point. OB concluded by noting that the final point on the slide concerns smart meter data. This was previously raised at the Metering committee as a requirement. The agreed approach is to adopt the definition of smart AMI meters discussed earlier by ES, whereby if a smart meter is present and functioning correctly, its read should be used for transfer. This future-proofs the change and ensures that, where appropriate, there is no need to dispatch personnel unnecessarily.

9.4. RR pointed out that although it makes sense to use smart meter data for transfer reads, current systems don't yet allow a smart read at the time of transfer. However, the soon-to-be-launched smart meter read hub will make this possible. RR also mentioned that creating manual processes in the meantime would be expensive and inefficient, so a disclaimer should state that smart data will be used only once the hub is fully operational and open to retailers. OB confirmed that the change (CPW 159) will roll out after the hub goes live, allowing time for users to adapt before the new process becomes mandatory. SM added that the standalone version of the smart meter read hub should debut before the code change, but its use won't immediately be required by the codes, meaning not every trading party will need to use it right away. BK concurred with RR's comments, noting that smart meters may not always

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transmit data reliably due to possible outages. BK highlighted that retailers might only have access to smart data for their own supply points during the transfer window, and if there is a temporary outage, a read may not be available for the required date. He suggested the code should specify that smart data is to be used only when available. OB agreed, confirming that wording would be added to clarify smart data use where available, addressing the concern raised. SF acknowledged the strong desire for retailers to use smart meter data if accessible and queried whether it was necessary to include this directive explicitly in the code, as retailers are likely to use smart reads if possible unless there are concerns over accuracy. RR responded that it was important to include this in the code to encourage use of accurate smart data and to avoid ongoing misalignment with field reality, even if a small percentage of reads are in question. JD offered an alternative view, questioning whether the code should mandate use of smart reads specifically or simply require a transfer read by any means, given that retailers would naturally prefer smart data for cost and efficiency. JL supported explicitly referencing smart reads in the code to reduce ambiguity and clarify expectations for all parties, improving market accuracy. SF proposed retaining smart meter data use in the code with the suggested wording, noting that there would still be flexibility for retailers to obtain a visual read if there were significant concerns. CM agreed, emphasising that retailers should have the option to use either method or that smart reads would likely become the norm as technology improves, making mandatory wording unnecessary.

9.5. The Committee discussed the purpose of the smart meter read provision, agreeing it is intended to discourage estimated reads when AMI data is available. It was clarified that retailers may choose between a visual or AMI read but should avoid estimates if actual data exists. There was debate over whether the code should specify the use of AMI data or simply outline all acceptable methods for obtaining a transfer read, with some suggesting detailed prescription could be left for guidance documents. The consensus was that the main objective is to prevent estimates when smart meter data is accessible, without mandating its use over visual reads. The codes should clarify when estimates are permitted and make clear that smart data should be considered to reduce unnecessary estimates, whilst maintaining retailer discretion. The Committee agreed to reference smart meter data in the solution, highlighting its use is advisable, not mandatory, when available and the meter is AMI-enabled.

9.6. OB noted that Part 2 of the proposed solution consolidates remedial actions under a single heading for improved clarity. Remedial action is necessary when the reason for an estimated read corresponds with established procedures, such as submitting a bilateral request for a

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broken meter. Current data show that bilateral requests are being initiated less frequently than required, averaging approximately 5%. The expectation is that implementing this requirement will enhance compliance. A definition for remedial action has been proposed: it is a corrective measure taken by the incoming retailer to identify and resolve the root cause of a missed or invalid meter reading. Where a missed meter reading results from a customer read issue, remedial action involves arranging a retailer read. If the customer reports a specific issue, for example, a broken or inaccessible meter, the appropriate corrective steps must be followed. If a meter reader reports a broken meter, the relevant actions should be taken accordingly. In cases where a customer fails to provide a valid read or does not provide one at all, the remedial response is to conduct a meter read to verify the accuracy of the estimate. This approach aims to reduce reliance on customer reads and consequently decrease the need for CT entries. For those performing both retailer and customer reads, this change will not impact current practice. However, where only customer reads are relied upon and estimates are used in their absence, it will now be required to initiate a meter read to meet the SLA and confirm the estimate's accuracy. The timeline for initiating remedial action is set at 15 business days from the registration start date; initiation means the meter read or bilateral request must be arranged, not necessarily completed, within that period. No objections or further comments were raised regarding these remedial action points. The final aspect of the proposed solution is to confirm the market operator’s audit rights, ensuring that MOSL may request evidence for audit purposes.

9.7. OB presented the next steps for the proposed solution. The Committee accepted the proposal, with a contingency in place for confirmation if significant changes occur. The upcoming phase will involve reviewing the legal wording, especially regarding smart meter data, which the Committee will revisit next month. A final recommendation to the Code Change Committee is anticipated in December.

The Committee:

UNANIMOUSLY AGREED to approve the solution.

9.8. The chair thanked OB for the update.

10. AOB incl. Reflections on the Meeting

10.1. The Committee reflected on the meeting.

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10.2. There being no further business, the Chair closed the meeting.

11. 11. Actions from Meeting

Action	Owner	Completion by
SMART AMI Definition CPW163 ACTION:54_01 - Collate and publish a supporting document outlining each wholesaler's approach to minimum performance standards for smart metering, including specific criteria such as data transmission requirements.	**MOSL**	October 2025
CPW162: Cyclic Read Skip Codes ACTION:54_03 **-** Clarify with CGI whether a separate transaction is needed for skip code removal and consider if simplification is possible for the new skip code transaction structure in CMOS	**MOSL**	October 2025

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