

## Minutes of the Metering Committee Meeting 55

21 October 2025 | 09:30 – 12:30

Via MS Teams

Status of the Minutes: Approved

### MEMBERS PRESENT

Spencer Mattia	SM	Chair*	Angela Brown	AB	Wholesaler Member
Ben Kershaw	BK	Retailer Member	Michelle Thompson	MT	Wholesaler Member
Jamie Davies	PH	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
Kevin McCalliskey	KM	Wholesaler Member	Steve Formoy	SF	MOSL Affiliate Member*

*\*Non-Voting Members of the Committee*

### OTHER ATTENDEES

Chris Dawson	CD	MOSL Presenter	Liz D’Arcy	LDa	MOSL Presenter
Elliot Smith	ES	MOSL Presenter	Toks Talabi	TT	MOSL Secretariat
Abu Rashid	AR	MOSL Presenter	Huw Comerford	HC	MOSL Presenter

## APOLOGIES

Jordanna Lo	JL	Retailer Member	Paul Heron	PH	Retailer Member
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## 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 JL and 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 16 September 2025 as an accurate record of the meeting.
- 2.2. The Committee noted that there are no actions to close.
- 2.3. The Committee agreed that the following actions should remain open: A54\_01. It was agreed to pause A54\_02 till Q3 2026 when further progress has been made.

## 3. Smart Meter Read Hub

- 3.1. SM presented the Committee with a progress update regarding the current status of the Smart Meter Read Hub. The following items and discussions were recorded:
  - The software development is in progress, with work currently focused on the initial proof of concept. It was advised that the MOSL team has received an early draft of the interface specification, as discussed last month. After reviewing and sharing feedback, the team are now waiting for the final version, which is expected to arrive during the week and will be ready before the end of the month.

- It was noted that the Steering Group is now active, and a meeting has been scheduled. The legal review of the user agreement has also been completed, with consultations scheduled for November.
- Recruitment for the Code Change Working Group has progressed successfully, with approximately six members confirmed from both wholesaler and retailer backgrounds, bringing the group close to full capacity. An update on this progress is due to be presented to the Steering Group at their next meeting. The initial meeting of the working group is set for November, and sessions are anticipated to continue into the spring 2026.
- The Committee noted that the initial proof of concept for phase one is expected to be delivered before Christmas. Subsequent to this, User Acceptance Testing (UAT) and engagement with trading parties will be carried out over the course of Q4. It was further recorded that phase two is planned to begin later in the financial year, following a period of review after phase one to assess lessons learned and make any necessary amendments to the requirements.
- The Committee considered the substantial concerns put forward by the legal team in relation to third party access. It was agreed that this matter requires thorough investigation to determine whether it should fall within the project scope. The issue of third part access has been highlighted on several occasions at the Metering Committee meeting, however following a recent review conducted by the legal team from a competition perspective, additional fear has arisen. RR reiterated ongoing legal concerns surrounding third party access, which are currently under internal discussion and will be further addressed at forthcoming meetings. SM confirmed that the issue will remain a standing item on the agenda.

3.2. The Committee discussed the next steps of the Smart Meter Advisory Group. It was noted that a final meeting had recently taken place, with the expectation that further engagement with the working group will resume in the new year, likely around Easter, once the current landscape is clearer. The Committee will assess whether any matters require inclusion in phase two or if consideration should be given to a potential phase three. These deliberations will inform subsequent decisions and concessions. Regarding code changes, it was reported that, subject to future working group meetings, the Committee intends to submit proposals to the Code Change Committee in the summer of 2026, with July identified as the target month.

The objective is to secure code approval in November, ahead of implementation in December 2026. The introduction of the hub, with the mandated codes, was also noted as a key milestone.

#### 4. Strategic Metering Programme Update

4.1. The Committee received a comprehensive overview of the Metering Programme, highlighting recent milestones achieved. The update also provided a summary of key elements from the Strategy Paper.

4.2. The Committee noted the following key points:

- The Committee was informed that progress continues across all 14 deliverables, with 7 having been completed to date. It was also noted that two projects remain on hold: the data sharing and benefits demonstration initiative, which is pending the resolution of third-party access issues and decisions regarding future phases of the hub, and the estimated vacant read code change, which is expected to resume in the early part of next year. Further positive developments were reported regarding the outstanding deliverables. In particular, enhancements to the metering dashboard were highlighted, including the addition of breakdowns by meter size and the identification of long-unread meters. Progress was also made in gathering wholesaler asset maintenance data, which was achieved through both direct submissions and the Smart Metering Water Delivery Group's maturity assessment. The Committee was informed that the definition of smart AMI received unanimous support at the CCC and is anticipated to go live on 1<sup>st</sup> December. Moreover, the smart metering guidance document is presently being revised after the initial working group session and the assimilation of further input. The annual review of meter reading obligations has been finalised, and supplementary analysis of MO2 data is currently ongoing. Furthermore, guidance documents relating to loggers is currently being brought together and revised, with progress actively monitored and further updates expected in due course. The Committee reviewed data on document downloads, which revealed considerable interest in materials covering metering technology and the smart AMI guidance. By comparison, there was notably less engagement with the interim data sharing guidance, prompting the Committee to discuss the need for enhanced communication and further reminders to ensure all relevant third parties are adequately informed.

- The committee queried whether it would be possible to provide a breakdown of the data, specifically distinguishing between wholesalers and retailers. It was suggested that, if not immediately apparent, a gentle reminder of this distinction may be useful. The Committee noted that many trading parties are awaiting the launch of the hub before progressing further. Those who are currently sharing data have largely aligned with the existing guidance, whereas others are using these requirements as they anticipate the hub's activation. The committee also discussed forthcoming opportunities to reinforce this guidance, including an upcoming user forum and a scheduled trading party training day, which could serve as additional reminders. It was agreed that further communications might be beneficial to ensure continued engagement and clarity among trading parties.

#### *Settlement Strategy Review*

- The three-week consultation on the proposed settlement strategy has concluded, with 24 responses received: 12 from wholesalers, 10 from retailers, one from a self-supply organisation, and one from CCW. The overall direction, objectives, and principles of the strategy received strong support, as reflected in high agreement scores 4.5 out of 5 for objectives and 4.4 out of 5 for themes. Feedback across the market was very positive, and all responses are now being reviewed before an update is presented to the panel in November.
- Stakeholders were largely in agreement that the strategy is both relevant and timely, and that it addresses the current challenges facing the market. The majority of feedback was supportive, with only a few minor issues raised. Some respondents did, however, express concerns regarding the complexity and cost of the strategy, the scope of the investigation (including whether comparisons should be made with other utilities), and the proposed delivery timeline, which aims for final completion by April 2030 with a focus on high priority matters first. Additionally, there were queries about the possibility of accelerating the process and whether any gaps or dependencies may have been overlooked.
- The Committee was advised of the next steps noting that AR will review the feedback in detail and present an update to the panel in November but will not seek approval at that time due to the volume of feedback and limited time. Final approval is targeted

for February, but work will continue in the background given the strong market endorsement.

4.3. The Committee was informed of the next steps, with AR set to thoroughly review the feedback and provide an update to the panel in November. However, approval will not be sought at that time due to the substantial volume of feedback and time constraints. Final approval is anticipated for February, with ongoing work continuing in the interim, supported by strong market endorsement.

4.4. The chair thanked CD and AR for their update.

## 5. Smart Metering Guidance document

5.1. The Committee was requested to review the initial draft of the Smart Metering guidance document, specifically concerning the Smart AMI definition, as detailed in paper MC55\_02 'Smart Metering Guidance Document: A Metering Committee Guide', which had been distributed prior to the meeting.

5.2. The Committee was reminded that the document's primary aim is to define the standards for classifying and overseeing Smart AMI meters, including the setting of anticipated performance levels and the establishment of processes for addressing meters that are defective or failing to meet required standards. This document serves as a foundation for both the rollout of the smart meter read hub and the management of broader operational issues within the market. ES advised that a workshop, involving around six volunteers, had been convened to review and rationalise the range of scenarios, resulting in the consolidation of certain cases and clarification of others. As a result, the document now sets out four main scenarios to guide the handling of smart meter-related matters.

5.3. The Committee went on to discuss the following:

- Committee members expressed concerns regarding the handling of scenarios involving unstable performance and recurring faults, particularly in relation to intermittent connectivity. They queried whether such meters should continue to be categorised as AMI within CMOS and proposed the introduction of a caveat or flag to identify intermittent performance issues. Members also emphasised the importance of considering conversion to remote meters, not solely to dumb meters, and raised issues about the potential for repeated bilaterals as well as the need for clearer guidance on B5 process outcomes. Additionally, clarification was sought on the logic of

downgrading meters to dumb status if they are unreadable, for instance if buried in concrete, suggesting that guidance should require such meters to be made readable rather than simply reclassified. It was clarified that the guidance is intended to avoid unnecessary reversion to dumb meters, with the preferred resolution being to ensure meters are readable. The earlier point regarding conversion to remote meters was acknowledged, with confirmation that the document is being refined to better address these scenarios.

- The Committee enquired whether the current guidance adequately addresses meters that have been installed but not yet connected to the network, highlighting this as a notable gap in market data. It was confirmed that commissioning scenarios are indeed covered, although it was acknowledged that there are limitations in the central tracking of such meters, which predominantly depends on dashboard information and planned installation dates rather than the actual connection status. Further discussion centred on the process for updating retrieval methods within CMOS, with members stressing the necessity for accurate market data to enable retailers to correctly determine when manual reads should be scheduled as opposed to relying on remote reads. It was clarified that, in practice, smart meters are initially recorded as "visual" in CMOS, and the retrieval method is only updated to "smart AMI" once connectivity is confirmed. This approach allows for retrospective identification of when a meter becomes smart-enabled. The need for clarity in market data was reiterated, with particular emphasis on ensuring retailers are properly informed regarding scheduling requirements. BK confirmed that the MPF metrics are aligned with this process, noting that meter's transition to MO2 only after the retrieval method has been amended. CD added that the guidance stipulates mutual agreement between parties before any meter is reverted from smart to visual status, and that retailers should ideally be given a minimum of one month's notice to accommodate any necessary changes to scheduling.

5.4. The Committee was informed of the next steps and asked to provide written feedback within a week. All input will be reviewed and included as appropriate, and an updated draft will be ready for approval at the meeting on 18<sup>th</sup> November.

ACTION 55:01

5.5. The chair thanked CD and ES for presenting the first draft.

## 6. Logger guidance document

- 6.1. The Committee received an update regarding the RWG decision and an overview of the potential content of the document.
- 6.2. The Committee received a proposal to consolidate the Metering Committee's QSP18 guidance, which pertains to logger-to-smart meter processes, with the RWG Data Logging Good Practice Guide into a single, comprehensive document. Ownership of this unified guidance will reside with the Metering Committee for clarity. The merged document is intended to deliver clear and consistent instructions regarding data logging for both traditional and smart meters, thereby minimizing confusion arising from multiple sources. It will delineate roles and responsibilities for applicants and wholesalers, encompassing installation, maintenance, and data provision procedures. The document will address ongoing issues such as third-party access to smart meter data and notification protocols for third-party logger installations. Additionally, it will outline procedures for dealing with damaged, non-loggable, and stranded assets, specifying communication responsibilities. A summary of market pain points will be included, and the guidance may be subject to review post-implementation to evaluate its effectiveness.

This led to the following points being highlighted:

- The Committee emphasised the significance of incorporating provisions for third-party access to smart meter data, addressing notification challenges encountered by third-party loggers, and considering the cost implications associated with smart loggable meters. The need to ensure alignment with ongoing legal discussions and prevailing market requirements was also emphasised. It was reported that a draft version of the merged guidance document would be presented at the next meeting to facilitate further input and review. Members advocated the inclusion of a summary of market pain points within the document and proposed that future compliance checks or surveys be explored to assess both adherence to and the effectiveness of the guidance. The Committee reiterated that only code requirements, as opposed to guidance, are subject to formal audit for compliance. The importance of clearly distinguishing between guidance and code standards was highlighted. SF agreed with this approach, noting that audits are generally confined to code compliance. SF further suggested the option of conducting a survey at a later stage to determine the extent to

which the guidance is being followed and its overall effectiveness, with a view to potentially implementing a code change if deemed necessary. This recommendation was acknowledged, and it was agreed that the relevance and effectiveness of the guidance should be periodically reviewed.

- Committee members discussed concerns regarding stranded assets and highlighted the necessity for transparent communication on the removal or modification of assets, particularly in terms of identifying who holds the responsibility for notifications. It was agreed that the revised document would outline clearly the roles and responsibilities associated with installation, maintenance, and data provision for both wholesalers and applicants. Additionally, it would address particular situations such as damaged or non-loggable meters. AR acknowledged that, while current guidance offers direction on issues like data flatlining and damaged meters, it does not comprehensively address procedures related to the removal of stranded assets or the associated communication obligations. Members expressed their support for establishing unambiguous processes, especially for larger users, and stressed the need for available logging options when necessary. The importance of having a defined process for notifying trading parties when assets are removed was also emphasised, ensuring all asset changes are properly communicated. AR confirmed that these suggestions would be considered for further elaboration within the document.
- The Committee noted concerns regarding the potential decline in service quality for customers, particularly large users, as the transition is made from traditional logging to smart metering. It was acknowledged that such apprehensions among major users were anticipated, drawing on findings from earlier regulatory investigations. While the majority of non-household customers are expected to benefit from the adoption of smart metering, the Committee recognised that the largest users, who rely on highly granular data, face unique challenges. Accordingly, it was reported that existing processes do provide for both smart and loggable meters to accommodate these needs. The discussion highlighted the necessity for options that preserve data granularity for large users. AR enquired about the cost differential between smart meters equipped with logging capability and those without, seeking clarity on the broader implications. Members responded that smart meters capable of logging are at least twice as expensive, particularly for larger meter sizes, which represents a significant financial consideration.

- The Committee considered instances where meters are installed but not yet connected, and the associated difficulties in monitoring and informing trading parties of such situations. CD confirmed that the guidance document addresses the scenario of a smart meter being installed but not yet network-connected, specifically within the commissioning and retrieval method sections. It was observed that, although installation schedules provide installation dates, they do not specify when meters become operational, exposing a gap in the central oversight of smart meters pending activation. Another Committee member highlighted that certain meters intended to be smart may never be connected due to technical issues, highlighting the importance of promptly notifying trading parties when such plans change. It was suggested that the guidance document does not currently address this particular situation and that coverage should be expanded accordingly. The Committee acknowledged these concerns, recognising the requirement to refine the guidance to comprehensively address cases where meters planned as smart cannot be activated. Additional contributions from members explained that changes to retrieval methods in CMOS can assist in tracking when a meter shifts from 'dumb' to 'smart', but limitations remain in associating exchanges and centrally monitoring non-activated smart meters. The Committee concluded that further clarification and enhancements to the guidance document are necessary to address these issues.

6.3. The Committee was provided with an update on upcoming actions, which included progress on the consolidated logger guidance document. The draft is being developed in alignment with earlier feedback and recommendations, addressing issues such as third-party access, smart meter data provision, pain points, and stranded assets. The preliminary version is scheduled to be submitted to the Committee at the November meeting for additional review and comment. Multiple revisions of the document are expected before it fully aligns with the Committee's requirements for content and scope. The chair thanked AR for his presentation.

## 7. QSP25 NoFlow project update

- 7.1. The Committee received a status report on ongoing work with NoFlow and were presented with a draft process map for resolving meters that show zero consumption.
- 7.2. The Committee received a summary of the proposed QSP25 NoFlow guidance, which addresses the issue of meters registering no flow. It was noted that the Metering Committee would retain ownership of the document, and that it would be supported by existing guidance and reporting processes. Members were reminded that the initiative originated from a

collaborative project involving OccuTrace and Wave, with financial backing from the Market Improvement Fund (MIF). During this project, visits were made to 20,000 occupied premises, revealing that 17% of meters were confirmed to be functioning correctly, approximately 31% were either physically damaged or not working, and more than half could not be inspected due to operational challenges, such as uncertainty regarding the occupancy status of the premises. It was recommended that trading parties leverage these findings to proactively address issues associated with defective meters, ensuring such concerns are incorporated into their strategies for asset replacement and the roll-out of smart meters, with a particular focus on the non-household market.

7.3. Members were presented with an overview of a straightforward, seven-step process designed to address meters registering NoFlow. This process begins with determining whether the meter qualifies for replacement or further investigation. Where necessary, the bilateral process is to be utilised, followed by a site visit and the implementation of suitable measures. The procedure incorporates input from a range of stakeholders to ensure it adequately covers specific scenarios, such as fire supply-only connections and compliance with insurance requirements.

7.4. The Committee then discussed the following:

- Committee members expressed concerns regarding unnecessary site visits and associated costs stemming from insufficient eligibility checks. They emphasised the necessity for clearly defined responsibilities, particularly for retailers in confirming customer occupancy, and highlighted the benefit of customer contact prior to escalation. The Committee acknowledged the issue of wasted resources and reached consensus on the importance of implementing robust eligibility checks before initiating bilateral requests. Reference was made to continuing efforts to improve the no flow report and the possible introduction of an assurance flag to prevent repeated, unnecessary visits. It was noted that the introduction of a genuine no flow flag in CMOS would necessitate a code change, with ongoing discussions as to whether this should be managed centrally or by trading parties and wholesalers. Consideration was also given to the interaction of such changes with other metrics. Furthermore, members agreed that the wider rollout of smart meters and the use of improved data would help mitigate these issues in the future by reducing the likelihood of duplicate checks and unnecessary site visits.

- Members advocated for the introduction of a centralised assurance flag within CMOS, underlining its significance for enhancing market visibility particularly during retailer transitions and to prevent complications associated with data transfer when such assurance is handled externally to CMOS. A broader approach was proposed, focusing on an assurance flag linked to the meter itself, capable of accommodating multiple valid sets to address various scenarios (such as AMI meter issues or confirmation of no flow). The Committee was updated on the progress of the assurance flag, with its relevance to areas like GIS metrics and the importance of ensuring market-wide visibility with minimal maintenance being noted. It was further highlighted that the present change to CMOS flags is pending Ofwat’s decision and is not specifically related to metering; any flag concerning metering would necessitate a separate change request. Additionally, the possibility of replicating data assurance items across various CMOS screens including both premises and metering sections was suggested as an option. It was agreed that this matter would be taken forward for further investigation, with SM noting it would constitute a separate change and AB stressing the importance of exploring available options.

ACTION 55:02

7.5. The Committee was informed that the MOSL team would keep them updated as the process progresses. The chair expressed gratitude to AB for her presentation.

## 8. CPW162: Cyclic Read Skip Codes

8.1. The Committee received a presentation on CPW162, the objective of which is to harmonise the market’s application of skip codes in order to enhance data quality and decrease the prevalence of LUMS and estimated reads. It was noted that both the finalised skip codes list and associated cost estimates are still in development; however, CGI has confirmed an implementation cost of £75,840. A revised schedule was proposed, suggesting that the CCC recommendation be postponed from December to February 2026. This extension will provide additional time to complete the skip codes list and obtain further feedback from the market. Currently, the list is approximately halfway finished, with a target range of 20 to 25 codes. Efforts are being made to broaden the range of access-related codes in response to significant market challenges. The remainder of the list is expected to be determined at the forthcoming RWG group meeting, alongside additional stakeholder engagement through webinars or

seminars. It was confirmed that the implementation date and the Ofwat decision timeline remain unchanged; only the recommendation date will be affected by the revised plan.

8.2. This prompted the following key points of discussion amongst the Committee:

- The Committee acknowledged the benefit of additional time, highlighting the considerable feedback received regarding access codes and underscoring the necessity for robust governance concerning future amendments to the skip codes list. Members enquired about responsibility for overseeing the skip codes list, specifically whether this role fell to the RWG or MOSL and discussed the appropriate frequency of changes to avoid placing undue strain on systems and incurring unnecessary costs. It was outlined that, should codes become obsolete as a result of updated guidance, it is incumbent upon the market to initiate code modifications and revise relevant processes. Furthermore, clarification was provided that, once guidance documents are formally codified, MOSL assumes responsibility for their ongoing maintenance, in line with established RWG guidance procedures.
- Members emphasised the significance of mapping existing household skip codes to the new CMOS codes, noting that this would prevent trading parties from incurring unnecessary expenses associated with altering their current codes, provided that accurate translation is ensured. The Committee proposed the establishment of clear mapping rules, with particular attention to wholesalers who hold meter reading contracts, in order to maintain a straightforward and cost-effective process.

8.3. The chair thanked ES.

## 9. Clarification of Meter Chamber Ownership (CPW141b)

9.1. The Committee received a presentation on meter chamber ownership clarification and post-implementation review.

9.2. Committee members were reminded of the background to CPW141b, which was originally developed by the Metering Committee to clarify meter chamber ownership and responsibilities for repair, replacement, and clearance as set out in the code. The change aimed to address inconsistencies in how trading parties and meter reading providers discharged these responsibilities. Specific guidance was produced to clarify whether the retailer, agent, or wholesaler should clear meter chamber debris in various scenarios, and this

guidance was implemented in February 2023. After implementation, data showed a slight decrease in the volume of B5 requests (used to report non-meter asset faults), but an increase in rejection rates, particularly for "policy" reasons. The principal causes for rejection were wholesaler policy and incorrect process usage, with policy-based rejections rising from 20% to 32%. Certain wholesalers, including Thames, Infinity, and Yorkshire Water, recorded notably higher rejection numbers. Internal reviews identified some incorrect rejections, prompting further process reviews.

9.3. The Committee noted that the guidance has been valuable in clarifying roles and reducing disputes between retailers and wholesalers. However, challenges persist regarding the quality of submissions and the requirement for two-person lifts, while some rejections arise from insufficient information or incorrect process selection. It was highlighted that the available data reflects only submitted requests and does not account for instances where guidance may have prevented unnecessary requests. To better assess the effectiveness of the guidance, members supported conducting a short survey to measure awareness and practical use. It was also proposed to analyse whether a reduced number of requests correlates with an increase in the number of meters made readable, ensuring that issues are being resolved rather than overlooked.

9.4. For the next steps, it was agreed to pursue further data analysis, consider conducting a pulse survey, and, if appropriate, review and republish the guidance in light of received feedback. The Committee's input will be used to inform the code change committee.

9.5. The chair thanked HC for the presentation and update.

## 10. AOB incl. Reflections on the Meeting

10.1. The Committee reflected on the meeting.

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

## 11. Actions from Meeting

Action	Owner	Completion by
Smart Metering Guidance document	Metering Committee	November 2025

<p>ACTION:55_01 - to provide written feedback within a week. All input will be reviewed and included as appropriate, and an updated draft will be ready for approval at the meeting on 18th November.</p>		
<p><b>QSP25 NoFlow project update</b> ACTION:55_02 - Investigate the feasibility of implementing an assurance flag in CMOS, including whether it would require a separate change and what options are possible.</p>	<p><b>MOSL</b></p>	<p>November 2025</p>