

Minutes of the Metering Committee Meeting 25

18 April 2023 | 09:30 – 13:15 | Via MS Teams

Status of Minutes: **FINAL**

MEMBERS PRESENT

Steve Formoy	SF	Chair*	Christina Blackwell	CB	Customer Representative Member
Richard Barton	RB	Retailer Member	Angela Brown	AB	Wholesaler Member
Mark Doherty	MD	Retailer Member	Rosie Rand	RR	Wholesaler Member
Claire Stanness	CS	Retailer Member	Michelle Thompson	MT	Wholesaler Member
John Davies	JD	MOSL Representative*	Mitchell Yeoman-Boldry	MYB	Wholesaler Member

**Non-Voting Members of the Committee*

OTHER ATTENDEES

Martin Hall	MH	MOSL Presenter	Alex Cowie	AC	MOSL Secretariat
Simon Bennett	SPB	MOSL Presenter	Abu Rashid	AR	MOSL Presenter
Adrian Smith	AS	MOSL Presenter	Amanda Hinde	AH	MOSL Presenter
Huw Comerford	HC	MOSL Presenter	Ivy Mandinyenya	IM	MOSL Presenter
Florentina Monea	FM	MOSL Observer	Harriet George	HG	MOSL Observer

APOLOGIES

Paul Heron	PH	Retailer Member	Kevin McCalliskey	KM	Wholesaler Member
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1. Welcome and Apologies

- 1.1. The Chair welcomed everyone to the Metering Committee (“Committee”) meeting and confirmed that apologies had been received from PH and KM.
- 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.
- 1.4. The Committee noted an update from IM that the Code Change Committee had considered the change proposal plan for CPW141 ‘Clarification of Read Definitions and Meter Chamber Ownership’, which was an output from Quick Start Projects (“QSPs”) 6 and 10. The Code Change Committee viewed CPW141 as having two elements: Part A, which sought to update the market code definitions of ‘remote’ and ‘visual’ meter reads to reflect changes in metering technology

that were available in the market; and Part B, which sought to clarify meter chamber ownership and repair/replacement responsibilities to remove inconsistencies in Trading Party and meter reader approaches. Following consideration, the Code Change Committee: agreed to progress the change proposal as two separate parts noting that Part B was a potentially more complex issue; agreed, that CPW141A would not require a consultation and may therefore be recommended earlier than the proposed plan; and agreed, that CPW141B would require a consultation and would therefore follow the proposed plan accepting that it may be accelerated if opportunity for earlier consultation arose.

- 1.5. In response to the update on CPW141 from IM, the Committee noted how closely linked Part B of the change was with the potential change in read responsibility in defined circumstances. Issues around the safe disposal of pit debris raised at the March Committee meeting were also re-emphasised and Committee members were encouraged to send any further photographic evidence through to CS and IM.

2. Minutes and Actions from Previous Meetings

- 2.1. The Committee agreed to approve the minutes of the Metering Committee meeting held on 14 March as an accurate record of the meeting.
- 2.2. It was agreed that the following actions would be closed: A22_01; A22_02; A22_03 and A24_01.
- 2.3. The Committee noted an update on the following actions, which would remain open: A15_05 and A16_02.

3. Customer and Societal Benefits of Enhanced Metering Technology

- 3.1. The Committee received a briefing on the findings of CCW's research into the customer and societal benefits of AMI meters, which was commissioned in order to explore business customers' views on whether the expected benefits of smart metering are being realised and enjoyed by businesses. The Committee noted that the research report '[Smart Thinking – Metering for Business Customers](#)' was published on 12 April and is available on CCW's website. The key findings were that:

- businesses are already aware of smart water meter benefits through awareness of growing popularity of other utility smart meters in domestic use (and business);
- there is strong support for a broader rollout of new water meter technologies, with businesses expecting smart water meters to become commonplace, with time and financial savings (for businesses and water companies) strongly outweighing any perceived drawbacks;
- the most compelling benefits of smart water meters are found to be increased financial control, savings and time efficiencies;
- businesses are accepting of installation fees, provided benefits are well-communicated; and
- businesses need educating on how smart water meters work and how easy installation is.

- 3.2. The Committee briefly discussed the findings, noting the following key points:

- The research was extremely useful and its findings should be integrated into and referenced in the Committee’s work wherever possible. It was confirmed that the survey results had been published.
- The data did not capture a breakdown of respondents’ meter size as the survey had been developed to be as straightforward for customers to engage with and answer as possible and it was not felt to be realistic to expect customers to know their meter size.
- CCW’s research partner conducted 507 online interviews from an on-line panel of businesses with a water meter in England and Wales. A further 17 boost interviews were facilitated after retailers contacted their metered customers using CMOS data provided by MOSL.

3.3. The Chair thanked CB for her presentation, and it was noted that while CCW would be pushing the report out to and engaging with water companies to try and ensure that its findings are picked up and used (e.g. in PR24 submissions) it would also be useful if Committee members were also able to push it out within their own organisations.

4. Roles and Responsibilities – Defined Circumstances Code Change

4.1. The Committee noted an update from AH on the development of the Defined Circumstances Code Change Proposal (“PIP156”) and the aims of the change. The Committee further noted that the defined circumstances currently proposed were where a meter was legacy long unread and where it met the criteria established for a ‘hard to read’ meter.

4.2. The Committee discussed the potential evidence base for the Change Proposal problem statement, noting the following key points:

- The aim of the change was to remove all LLUMs from the market by addressing the root cause of the issue and getting meter reads in (with the exception of internal meters at vacant premises) and, similarly, to make all meters currently defined as ‘hard to read’ readily readable.
- There was significant push back on what changing read responsibility in these circumstances would achieve over and above the bilaterals processes that were currently in place. The need for collaboration between wholesalers and retailers to obtain meter reads for LLUMs and ‘hard to read’ meters was also emphasised, and concerns were raised that moving read responsibility to wholesalers might undermine the message that collaboration is key. Committee members also raised concerns that, if responsibility for securing a read was moved to wholesalers they might be able to get a read but in some circumstances (such as where a two-man lift is required) when the meter has been read and responsibility transfers back to retailers they would still not be able to read the meter and the cycle of the meter being long unread would begin again.
- While the target of having all LLUMs and ‘hard to read’ meters resolved within MOSL’s suggested 18 months felt unachievable, a revised aim of all LLUMs and ‘hard to read’ meters either being read or assessed with what remedial action is required within a specified time frame was supported by the Committee.
- There was possibly an opportunity for any activity to push beyond the current scope and to look to address the LLUMs that are internal meters at vacant premises where there is potential for bill shock in the event there was an undetected leak at a vacant premises.

- It would be helpful for the Committee to be able to understand segmentation of the LLUMs and ‘hard to read’ meters currently in the market and the reasons why they cannot be read. It was noted that the findings from Project Looking Glass might provide some initial insight on this.
- The possibility of introducing a process for assuring internal long-term vacant premises was welcomed although how this would work in practice and who would have responsibility for assuring would require further working through.
- Any drafting of the change or related materials on this workstream should be careful around use of the phrasing ‘removing LLUMs from CMOS’ (or similar) as, while the process might result in some LLUMs being identified as no longer in the market, this was not the core purpose of this work.
- Any change of read responsibility for LLUMs and ‘hard to read’ meters would need to consider how wholesalers taking responsibility for these reads should be funded, especially as, by their nature, there would be a higher cost associated with reading LLUMs and ‘hard to read’ meters.

4.3. Following discussion and, given the points raised, the Committee reflected that it would be worth stepping back and exploring further whether the issue of addressing LLUMs and ‘hard to read’ meters would be best addressed through a change in read responsibility or via either a new bilaterals process or a strengthening of existing processes. It was agreed that the metering team would work to map out the processes to address the different circumstances that might lead to a LLUM or ‘hard to read’ meter, with an indication of who is responsible for which steps and that this should be reviewed at the next Committee meeting if possible. Given the discussion and the need for further work the Committee was also of the view that the current timeline for any Code change proposal was too tight and that it was unlikely that a proposal would be ready to go to the June Code Change Committee.

ACTION MC25_01

- 4.4. MT, RR, AB and CS volunteered to help the metering team work through the development of the process map ex-Committee.
- 4.5. The Chair noted the next steps that had been agreed and thanked AH for her presentation and the work undertaken to date.

5. Roles and Responsibilities – Project AMIDST and Smart Meter Reads Code Change

- 5.1. The Committee noted an update from MT on the findings of Project AMIDST, an interim report from which was now available with a final report pending further testing of the solution with retailers. The Committee further noted the interaction between the Project AMIDST findings and interim solution and the Roles and Responsibilities Option 3 Smart Meter Read Responsibility Code Change Proposal, a problem statement for which was circulated in advance of the meeting, and which draws on the PA Consulting Report and Project AMIDST findings.
- 5.2. The Committee discussed the Project AMIDST interim solution and the Smart Meter Read Responsibility Code Change Proposal problem statement, noting the following key points:

- While the interim solution being developed by Project AMIDST was seen as extremely efficient and scalable option, it was not mandatory and trading parties could use other approaches to submit smart meter reads into CMOS.
- Retailers currently like the ability to check the smart meter reads provided against their billing algorithms and it would be important to build up data about how often reads are challenged to support this change proposal. It was also noted that where reads are anomalous, due to the accuracy of smart meter data, this is more likely to be as a result of a leak or a change of use rather than incorrect data and this should be taken into account when analysing the number of reads challenged/rejected.
- The metering programme team should look to leverage the data generated by implementation of the interim solution as well as any other smart meter read submission data (such as that which could be provided by Thames) to demonstrate the accuracy of smart meter reads and support the change.
- As part of the development of the Code Change Proposal solution, there might be some benefit to comparing the processes developed by Project AMIDST and the one used by Thames Water, including the rules used for CMOS entry.
- The solution developed would consider the impact of increased read volumes being entered into CMOS and the system's capacity to cope with increased data entry. At this point it was not possible to say whether the enduring solution would upload reads as they were submitted or push reads through on a single date each month to align with the settlement process.

5.3. The Committee noted a verbal update from HC detailing the process that would be followed for developing the Smart Meter Read Responsibility Code Change, which would be taken to the MOSL internal investment approval board before being submitted for Gate 1 approval at the May Code Change Committee. The Change Proposal would then come back to the Committee a number of times as part of its development before a consultation was launched. When the consultation responses came in these would be brought to the Committee for review and discussion before a final recommendation report is submitted to the Code Change Committee, which would likely be in January 2024.

5.4. MT and RR volunteered to assist the MOSL team with the development of the Code Change Proposal and enduring solution and it was also suggested that a further trading party representative, who was not on the Committee but had been involved in testing the Project AMIDST interim solution, be involved.

5.5. The Chair noted the process and timings for developing the Code Change Proposal and thanked MT for her presentation and MT and HC for their work.

6. National Metering Strategy

6.1. The Committee noted a verbal update from AS on the progress of the Interim National Metering Strategy ("Interim Strategy") and next steps.

6.2. The Committee were very positive about the final Interim Strategy and welcomed its publication, noting the document's clarity and the provision of practical and useful templates. The foreword provided by the Strategic Panel Chair and strength of support from the Strategic Panel were also welcomed.

6.3. The Chair thanked AS for the update and noted that it would be good to review how trading parties had adopted the Interim Strategy and included it in their final WRMP submissions in due course.

7. QSP15 Sub Metering

7.1. The Committee noted an update from AR on the development of potential Code changes for the sub metering issues that have been identified by QSP15, including the work being done elsewhere that might pick up and address some of the identified issues. The potential solutions under consideration were:

- allowing wholesalers to add or change YVEs for non-market meters;
- creating a “R” read for retailers to add non-market meter reads in CMOS;
- adding an occupied status label within CMOS to a non-market meter site.

7.2. The Committee briefly discussed the potential solutions, noting the following key points:

- That the project had picked up all of the issues identified by the non-market meter market audit.
- Whilst the potential solutions were all sensible in terms of addressing the issue, a key consideration going forward would be whether the potential cost of implementing them was justified given the relatively low number of meters impacted. As such there would be benefit to comparing the benefits of the proposed Code changes with other in-train activity such as the current review of industry level estimates and volume estimating caps.
- It would be beneficial to have an understanding of the level of non-market meter reads received from customers when considering whether to progress a potential solution to create an “R” read for retailers to add non-market meter reads in CMOS. Additionally, it was suggested that it would be worth considering whether it would be more cost efficient to introduce the capacity for retailers to enter an estimated read for non-market meters rather than introducing an occupied status label for non-market meter sites (as the same outcome could be achieved with retailers entering a same as last read estimate for vacant non-market meter premises).
- A question was raised as to what the purpose of creating a “R” read for retailers to add non-market meter reads in CMOS was if it was not settlement affecting, given that the point of this project was to address issues such as negative consumption being recorded at sites where there are non-market meters. It was also suggested that the solution being developed via Project AMIDST should consider whether sub meter reads should be included as part of the data delivered by wholesalers where there is a smart meter in place.

7.3. The Chair thanked AR for his presentation and for stepping in to present at late notice. It was noted that this was an early sight of the development of some solutions and that it would come back for further consideration in due course.

8. Tabled Updates

- 8.1. The Committee noted the Tabled Updates paper circulated in advance of the meeting detailing progress on the Committee's workstreams and metering-related projects.
- 8.2. RR invited Committee members to reach out to her directly if they were interested in getting involved in the continuous flow QSP and SB reminded Committee members of the new QSPs currently without sponsors and for volunteers to sponsors those projects.

9. AOB, including reflections from the meeting

- 9.1. The Committee reflected on the meeting.
- 9.2. The Committee welcomed an update from SF on the proposed development of metrics for the Strategic Metering Programme, noting that while this would be brought for further discussion when further information was available on the Strategic Panel's roadmap to a flourishing market.
- 9.3. Several Committee members flagged emails they had received in relation to MIF Project Pinpoint, which referenced a MOSL-recommended data platform. It was clarified that MOSL had not recommended any data platform and that the purpose of Project Pinpoint was to compare the accuracy of asset data across different systems to establish a single source of truth on meter data and that the emails received were part of an effort to get further trading party involvement in a pilot programme.
- 9.4. There being no further business, the Chair closed the meeting.