Minutes of the Metering Committee Meeting 26

16 May 2023 | 09:30 – 12:45 | Via MS Teams

Status of Minutes: **FINAL**

MEMBERS PRESENT

Steve Formoy	SF	Chair*	Christina Blackwell	CB	Customer Representative Member
Angela Brown	AB	Wholesaler Member	Richard Barton	RB	Retailer Member
Rosie Rand	RR	Wholesaler Member	Claire Stanness	CS	Retailer Member
Michelle Thompson	MT	Wholesaler Member	Paul Heron	PH	Retailer Member
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	Amanda Hinde	AH	MOSL Presenter
Adrian Smith	AS	MOSL Presenter	Florentina Monea	FM	MOSL Presenter
Ivy Mandinyenya	IM	MOSL Observer	Stella Furniss	SFs	MOSL Observer

APOLOGIES

Kevin McCalliskey	KM	Wholesaler Member	Mark Doherty	MD	Retailer Member
John Davies	JD	MOSL Representative*			

1. Welcome and Apologies

1.1. The Chair welcomed everyone to the Metering Committee ("Committee") meeting and noted that apologies had been received from KM, MD and JD.

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 noted the draft minutes of the meeting held on 18 April that had been circulated in advance of the meeting along with a request for any comments to be provided by Friday 19 May and agreed to approve the minutes ex-Committee.

2.2. It was agreed that the following actions would be closed: A25_01.

2.3. The Committee noted an update on the following actions, which would remain open: A15_05 and A16_02.

3. FY23/24 Metering Strategy

3.1. The Committee received an update from MH on proposed and potential strategic projects for the Metering Programme in FY2023/24, noting that development of a long-term metering strategy for the non-household water market would be a key focus along with the development of data sharing for granular data and a range of other projects as described in the Strategic Metering Roadmap. The Committee noted that as resources were limited, they were being asked to provide initial views on the prioritisation of the potential projects.

3.2. The Committee noted that the following projects were considered 'must do' for the coming year:

- follow-on promotion of the Interim National Metering Strategy;
- development of a 'full', long-term National Metering Strategy;
- further development and augmentation of the Data Interoperability Standard;
- development of a data sharing process (and consideration of the role of a central platform); and
- providing expert input on the development of metering-related incentives via the Market Performance Reform Programme.

3.3. The Committee noted that the following projects were considered 'could do' for the coming year:

- developing a set of best practice principles in relation to data sharing and data protection regulation;
- consideration of how the market could demonstrate alignment with Ofwat's open data principles;
- looking at how trading parties can get the most from AMR meters and loggers;
- undertaking research to understand the 'true cost' of meter reading, including additional costs required to reach 100% read performance (including for legacy long unread and hard to read meters);
- developing a business case for meter asset data improvement; and
- developing guidance for the implementation of retailer or customer led smart metering programmes.

3.4. The Committee discussed the proposed and potential programme of strategic work for FY22/23, noting the following key points:

- It was noted that it would be useful to understand how the proposed strategic projects link to the ongoing meter reading roles and responsibilities projects as well as which of them would potentially lead to Code changes, although the Committee also recognised that the scope of the projects, including whether they would lead to any Code changes,

would be defined by the Committee as part of the initial tranche of work as the projects are taken forward.

- More work was required to explore the feasibility and scope of any central data sharing platform before any work was undertaken looking at what the design of any central platform might look like.
- With regard to the proposed project exploring the true cost of meter reading, the Committee noted that while this would be too late to influence the outcome of the current REC Review it remained an important issue that help to more clearly define the potential benefits of smart metering and influence future reviews. Additionally, the potential importance of understanding meter reading costs as part of the development of the smart meter read responsibility and defined circumstances workstreams was noted especially given the need to consider funding as part of this work.

3.5. Following discussion, Committee members completed an initial indicative ranking of the priority order of the proposed 'could do' projects. Committee members collectively ranked the projects in the following order:

- First priority - looking at how trading parties can get the most from AMR meters and loggers.
- Second priority - undertaking research to understand the 'true cost' of meter reading, including additional costs required to reach 100% read performance (including for legacy long unread and hard to read meters).
- Third priority - developing guidance for the implementation of retailer or customer led smart metering programmes.
- Joint fourth priority - developing a set of best practice principles in relation to data sharing and data protection regulation.
- Joint fourth priority - consideration of how the market could demonstrate alignment with Ofwat's open data principles.
- Joint fourth priority - developing a business case for meter asset data improvement.

3.6. The Chair thanked MH for his presentation and it was noted that the next steps would be for MH to iterate the priority strategic projects paper based on the feedback received and to circulate it for further comment ex-Committee ahead of presentation for any final comments at the June Committee meeting.

ACTION MC26_01

4. Roles and Responsibilities – Defined Circumstances Code Change

4.1. The Committee a presentation from AH that recapped the discussion around the defined circumstances read responsibility workstream at the April Committee meeting, summarised the existing skip code process and requested feedback from the Committee on the overarching goals of the workstream, the current reality faced by trading parties trying to resolve legacy long unread meters ("LLUMs") and hard to read meters, options for addressing the existing barriers and opinions on where responsibility for those activities should lie.

4.2. The Committee reflected on the presentation and request for feedback noting the following key points:

- The overarching goal of the project should be to eliminate all LLUMs and to prevent them returning to long unread status once a read has been entered into the market. However, the Committee also provided feedback that it would not necessarily be realistic to eliminate or resolve all 24,000 LLUMs and therefore for all customers to receive bills based on actual meter reads following the conclusion of the project.

- The goals for the workstream, as currently stated, could be developed to include understanding the root cause of all LLUMs. Committee members clarified that they viewed understanding the root cause of LLUMs to require an investigation that went a step further than Project Looking Glass.

- It would be important to consider the fairness of existing MPS charges as part of the project and whether any action should be taken to suspend charges for LLUMs where a retailer is not able to generate a read due to factors outside of its control. It would also be useful to look at the LLUMs that have, or have had, a bilateral request raised against them and to understand the activity that has been undertaken as part of this discussion. League tables were also suggested as a potential reputational incentive that could

- It would be important to develop an agreed best practice process for how trading parties should act where getting an actual read for a LLUM results in significant customer bill shock.

- In order to understand what action would be most appropriate it would be necessary to break down the LLUMs in the market into different categories e.g. internal/external LLUMs, vacant/occupied LLUMs, water/trade effluent LLUMs. Different activity would likely be required to effectively address the different categories of LLUMs.

- An issue where the root cause of LLUMs is customer-led was highlighted, specifically where access to the property is refused, or where the property is long term vacant and a lack of customer contact makes access very difficult.

- While this project was highlighted as an opportunity for the market to reset its approach to LLUMs and hard to read meters, a note of caution was sounded around moving too far away from existing processes to the extent that collaboration, which was seen as key to resolving LLUMs, is disincentivised.

- It was suggested that a gap analysis might be required to identify the level of bilateral requests being raised in relation to LLUMs and to understand why some trading parties are not using the existing bilaterals process that is available and why some bilaterals requests that have been raised are being deferred or closed without any resolution. There was some feedback that resource issues were likely part of the reason that only a relatively small number of LLUMs had bilateral requests raised against them, both in terms of wholesaler capacity to action them and retailer capacity to deal with the level of activity that might come out of the bilateral request, with Committee members again stressing that collaborative working was key to resolving these issues.

- A question was raised as to whether MOSL could raise bilateral requests against all 24,000 LLUMs, however while there was some support for this idea, Committee members

agreed that action was required to address LLUMs given the lack of progress since market opening this was not seen as a viable way forward.

- It was noted that where a LLUM could not be found (which was likely to be a large proportion of total LLUMs), a significant portion of these meters would likely relate to gap sites where a meter had been installed in a location that subsequently had a building built over it.

- Where the LLUM related to an internal meter at a vacant property, Committee members felt that there was a clear case for the installation of a smart meter to make the meter regularly readable. It was further noted that the benefits of installing smart meters to address the issue of LLUMs would not be restricted to vacant internal LLUMs.

- There might be a case for converting a meter to assessed charges where it was LLUM and likely to be low consumption.

- While wholesalers had statutory powers to gain access to a property where a customer is blocking access to a meter, the resource intensive nature of this interaction meant that it was only likely to be used in rare circumstances where all other avenues had been exhausted. Given this and observations previously made around the ability of some customers to make accessing a meter difficult, it was suggested that a penalty charge for preventing access (or possibly a 'no access' tariff) could potentially be applied and that this might be something to pick up with the RWG Access Subgroup.

- Given the perception that there was a relatively high deferral rate for LLUM bilaterals requests, the idea of creating a separate category for these requests in the bilaterals hub that enabled the time taken to resolve the request to be tracked and reported on was raised. In this context, the interaction between wholesalers' wholesale and operational teams was noted along with the potential need for wholesalers to consider where the impact of failure to address bilaterals requests landed to ensure that picking these up was correctly incentivised internally.

- Although a number of examples of where circumstances would make addressing LLUMs had been raised, the importance of focussing on the large group of LLUMs that could be addressed and made readable with the correct incentives to take action was emphasised.

4.3. AH thanked Committee members for their feedback and noted that this would be taken into account as part of the development of potential solutions to the issue of LLUMs and 'hard to read' meters.

4.4. MH talked through the draft process map for a change in read responsibility for LLUMs and hard to read meters and summarised the findings from Project looking Glass. The Committee reflected on the draft process map noting the following key points:

- It would be important to establish how a property could be verified as long- term vacant and to consider whether read requirements should be as frequent where a property is verified as long-term vacant. The benefits of reducing read costs where a smart meter is installed at a long-term vacant property were also noted. The potential to cut off supply and amend the SPID status in CMOS was noted, although it was also observed that there might be a requirement to maintain supply for building insurance purposes where a sprinkler system is installed.

- Where neither the wholesaler nor the retailer is able to access a property or contact the customer or landlord, a vicious cycle of a bilateral being raised and then closed with out resolution can occur and it is important that any process map details the expected actions to break that cycle.

- The Scottish Water Markets approach to vacant properties where charges are passed to the landlord when there is no business occupant was noted and it was suggested that there might be some benefit to adopting the same approach in the English market. The work of the Landlord TAP website in enabling contact with landlords in the household water market was raised and it was suggested that the workstream should contact it to understand whether they might be able to play a similar role in the non-household market.

- On the 'hard to read' process map, it was noted that the process map would need to refer back to the hard to read meter guidance document to establish what is expected of meter reads and that it would also need to build in what to do if a meter that had been flagged as 'hard to read' was rejected as well as establish the evidence threshold for assigning 'hard to read' status. The process would also need to ensure that it encouraged collaboration between retailers and wholesalers in order to prevent meter read responsibility being passed backwards and forwards with no resolution for the customer.

- It was suggested that the final step in the process for a 'hard to read' meter should be the installation of a smart meter, where possible.

- While the importance of collaboration was accepted, it was also emphasised that the current process which relied on collaboration had failed to adequately address the issue of LLUM and 'hard to read' meters and that further action was required.

4.5. MH thanked Committee members for their feedback and outlined three potential options for taking this work forward: (1) MOSL to raise a Code change as soon as possible to move read responsibility for LLUMs and 'hard to read' meters from retailer to wholesalers; (2) MOSL to raise bilateral requests against all 24,000 LLUMs that do not currently have a bilateral request raised and monitor their resolution in line with existing requirements; further testing of the root cause of LLUMs and 'hard to read' meters by allocating, respectively, a small sample of LLUMs to wholesalers and retailers which they would report back on following attempts to resolve in line with agreed processes.

4.6. The Committee reflected on the options outlined by MH and:

- **AGREED** that it was not appropriate to raise a Code change to change read responsibility for LLUMs and 'hard to read' meters at this point and that it would also not be appropriate for MOSL to raise bilaterals against all 24,000 LLUMs. The consensus view was that further work was required to establish a solution that would effectively address existing issues that have stopped reads being generated for LLUMs and 'hard to read' meters and that undertaking the pilot programme set out in option three would likely be the best way to get to an evidence-based solution.

4.7. The Chair thanked AH and MH for their presentations and Committee members for their insight and summarised the key issues that the Committee had raised that should be addressed as this work was taken forward as being:

- examining the different categories of LLUMs and considering the best path to resolving them depending on their circumstances;
- the role of performance reporting in providing a reputational incentive to address LLUMs and 'hard to read' meters, including considering the kind of data available and the insight that could be generated;
- the allocation of existing charges and whether the current application is fair as well as potential future allocation of charges;
- the potential role of penalties or tariffs in addressing issues where customer activity is the root cause of a LLUM or 'hard to read' meter;
- developing 'good practice' guidance on how to address instances of significant bill shock where a read is generated for a LLUM that is significantly different to previous estimates; and
- whether the approach to 'hard to read' meters should be looked at separately to LLUMs.

4.8. The Chair further noted that the next steps would be for the team to go away and consider the best approach to addressing the different categories of LLUM and 'hard to read' meters and would bring this back for further discussion with the Committee before moving into any kind of pilot programme.

5. Roles and Responsibilities – Smart Meter Read Code Change

5.1. The Committee noted a verbal update from FM on the feedback from the May Code Change Committee on the proposed smart meter read responsibility Code change including the proposed plan to accelerate the change timeline to work towards a May 2024 implementation date.

5.2. The Committee discussed the defined circumstances process map, noting the following key points:

- It was noted that Project AMIDST's interim solution already provides an avenue for a fast process for submitting smart meter reads into CMOS and that the change being proposed would primarily be about removing the final step of retailers checking the reads and approving them prior to the reads being entered into CMOS. In this context, it would be especially important for the consultation to establish whether retailers are comfortable with this step being removed.
- CB confirmed that CCW would put someone forward to join the workstream. The Committee also noted that the issues being raised in relation to the solution were highly technical and it was suggested that it might be beneficial to bring in additional technical expertise from trading parties as required. It was also suggested that John Briggs, the Chief Architect in MOSL's digital and data team, who had provided technical support on the interim solution produced by Project AMIDST would bring useful insight to the workstream.
- It was emphasised that the workstream and any potential Code change would need to consider the funding impact and implications of transferring read responsibility from retailers to wholesalers for smart meters and that it should also consider the question of how meter reading charges should be applied, although it was noted that this will likely be picked up as part of the Market Performance Framework Reform Programme.

- It would be useful to clarify how the smart meter reads entered by wholesalers would link into customer billing processes to ensure that there was not any unintended adverse effect on customers.

- It was noted that the wider benefits of this Code change in terms of enabling water efficiency and other potential customer benefits should also be brought into the change documentation as the work progresses.

5.3. The Committee:

- **AGREED** to work towards the expedited timetable proposed by the Code Change Committee

5.4. The Chair thanked FM for her work and noted that various aspects of the solution and consultation would come back to the Committee for review at appropriate points as the Code change progressed.

6. LIDA 2

6.1. The Committee noted a brief update on the scope of the LIDA 2 Project, which aims to build water use profiles by customer type to support conservation guidance and leak reduction in the non-household water sector, the data being used by the project and the tasks that the Leeds Institute of Data Analytics Data Scientist had been given.

6.2. The Chair thanked MYB for the update and noted that further updates on the project's progress would be provided in due course.

7. Project NoFLow

7.1. The Committee noted a brief verbal update from CS on the initial findings of Project NoFLow, which was investigating instances of zero-consuming meters. CS noted that the aim was to conclude the meter visits by 2 June and that the final sample size was likely to be between 1,600 and 1,800.

7.2. The Committee reflected on the initial findings and suggested that it would be worth considering the percentage of meters manufactured by each manufacturer by age category when looking at percentage failure rates per manufacturer before drawing any conclusions on rates of failure. It was also noted that direct comparisons of meter asset life with gas and electricity meters could not necessarily be made as the exposure to the elements driven that are a result of water meter location would likely have a detrimental impact on asset life.

7.3. AB stated that she would see if her organisation could provide a breakdown of information for their household meter population to provide to the Project NoFLow team for comparison with their sample.

7.4. The Chair thanked CS for her presentation and noted that it was anticipated that a draft of the report would be presented to the July Committee meeting for further review and feedback ahead of publication and presentation at a webinar.

8. QSP6 Hard to Read Meters – Meter Debris Guidance

8.1. The Committee noted the draft Meter Debris Guidance document circulated in advance of the meeting as well as a brief verbal update from CS and a request for feedback ahead of the anticipated publication of the final guidance document on the MOSL website.

8.2. The Committee reflected on the commented on the draft Meter Debris Guidance document, noting the following key points:

- Overall, the document was really useful and would make a good addition to the market.
- It would be useful to revisit the wording at the start of the document to clarify that it was intended to provide some clarity in what are currently grey areas in the lead responsibility for resolving meter debris issues that are preventing meter reads.
- There was some concern that it was not clear from the photo for the instance where material was covering the meter chamber that responsibility for moving it should lie with wholesalers as, for example, where the customer had left logs over the meter it was the customer's responsibility to move them. It was noted that the wording of that image would be amended to clarify that where the customer has placed material over the meter responsibility for moving it lies with the customer and this interaction should be retailer led (although there was some pushback that the customer would have the right to store things on their land and there might be questions about whether the meter should have been installed in a different location which would be a wholesaler issue). Similarly, consideration should be given to amending the wording for the other photographs to add some nuance around where primary responsibility lay and that discussion might be required where a meter was under water due to heavy rainfall.
- It was suggested that context around the time constraints on meter readers and fair expectations around the time spent to clear a meter might be useful additions that would, for example, help to clarify where responsibility for pumping out water covering a meter would be a wholesaler's responsibility. It was also noted that where meters were frequently underwater due to their location, wholesalers should be considering either moving the meter or installing a smart meter so that it was no longer hard to read.
- It might be useful to add an arrow or other tool to indicate where the meter was located in the pictures as identifying this from the photographs was not always easy.
- It might be useful for the project team to continue to ask for feedback from trading parties and photos on an ongoing basis so that the Guidance could be iterated on an ongoing basis, although it was noted that this review and update should not be updated more frequently than every six months so that trading parties had clarity on what was expected of them.
- Going forward, it would be important for the Committee to review and consider the impact of this and other Guidance documents to check that they are having the desired impact on the market.

8.3. The Chair thanked CS for her presentation and noted that the QSP6 team would take this feedback onboard and update the document before circulating it for any final comments ex-Committee prior to publication.

ACTION MC26_02

9. Tabled Updates

9.1. The Committee noted the Tabled Updates paper circulated in advance of the meeting detailing progress on the Committee's workstreams and metering-related projects as well as a verbal update from PH that QSP15 'Sub Metering' continued to move at pace and would be looking to expedite the timeline for one of the proposed Code changes coming out of the workstream and that this would come back to the June meeting for comment alongside a more general update on the progress of the workstream.

9.2. The Committee noted a request from RR that any other members who would like to be involved in QSP16 'Continuous Flow' contact her directly.

10. AOB, including reflections from the meeting

10.1. The Committee noted an update from MH on an issue raised by Thames Water in relation to the Data Interoperability Standard that broadly related to the number of decimal places allowed by the standard meaning that they would not be able to provide data from some of their larger meters. There was consensus on the Committee that members agreed to action the change to the Standard requested by Thames to address this issue.

10.2. The feedback on the Data interoperability Standard prompted a wider discussion on how the Standards and Guidance produced by the Metering Programme should be managed and it was agreed that MH would bring a paper to the June Committee meeting proposing a document management process. It was noted that the process should build in a regular annual or biannual review cycle but also provide flexibility to allow for urgent updates.

ACTION MC26_03

10.3. The Committee noted an update from CS that the CPW128 and CPW130 Code changes that had been developed by the Committee had now gone live in the market.

10.4. RB noted that a number of actions raised by the transfer reads market audit had been assigned to the Committee to pick up and it was noted that these would be picked up by QSP8 'Transfer Reads', which was being sponsored by CS and it was agreed that RB would join that QSP.

10.5. The Committee reflected on the meeting.

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