Minutes of the Metering Committee Meeting 34

16 January 2024 | 09:30 – 12:30 | Via MS Teams

Status of Minutes: **APPROVED**

MEMBERS PRESENT

Spencer Mattia	SM	Chair*	Michelle Thompson	MT	Wholesaler Member
Christina Blackwell	CB	Customer Representative Member	Kevin McCalliskey	KM	Wholesaler Member
Richard Barton	RB	Retailer Member	Rosie Rand	RR	Wholesaler Member
Paul Heron	PH	Retailer Member	Mitchell Yeoman-Boldry	MYB	Wholesaler Member
Claire Stanness	CS	Retailer Member	Angela Brown	AB	Wholesaler Member
Sindiso Bango-Dube	SBD	Retailer Member			

**Non-Voting Members of the Committee*

OTHER ATTENDEES

Martin Hall	MH	MOSL Presenter	Alex Cowie	AC	MOSL Secretariat
Florentina Monea	SM	MOSL Presenter	Dene Marshallsay	DM	Artesia Consulting Presenter
Simon Bennett	SB	MOSL Presenter	Dave Gough	DG	Artesia Consulting Presenter
Adrain Smith	AS	MOSL Observer	Liz D'Arcy	LDa	MOSL Observer
Chris Dawson	CD	MOSL Observer			

APOLOGIES

Mark Doherty	MD	Retailer Member	Steve Formoy	SF	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 MD and SF, and that MT had indicated that she would join the Committee around half an hour late. The Chair noted that MD would try to join the latter part meeting if possible, and that if he was not able to join for the update on Quick Start Project ("QSP") 17 'Internal Meter Access', then SB would step in to cover.

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 that the minutes of the Metering Committee meeting held on 19 December 2023 would be approved as an accurate record of the meeting ex-Committee, provided there were no comments by close of business on 18 January 2024.

2.2. The Committee agreed that the following actions would be closed: A33_01.

2.3. The Committee noted an update on the following actions, which would remain open: A15_05, A16_02, A29_02 and A32_01.

3. National Metering Strategy

3.1. The Committee welcomed an update form MH on the development of the National Metering Strategy (the "Strategy") that aimed to help deliver the benefits of smart metering to the non-household market through increasing the ability of wholesalers to deliver the DEFRA 9% consumption reduction target, enabling retailers to deliver improved competitive services to customers and enabling improved, tailored water efficiency services to customers.

3.2. MH outlined the key themes and messages that were currently being considered for inclusion in the Strategy. These were:

- That the Strategy would be agnostic in terms of the choice of technology beyond the requirement for the technology chosen by wholesalers to be capable of delivering granular data sharing.
- That a full roll out of smart meters should be achieved by the end of AMP9 in 2035.
- That non-household smart meter roll outs should be carried out alongside household smart meter roll outs.
- That wholesalers should commit to ensuring all customers have smart metering installed and that this should include replacing meters that are long unread, hard to read and broken.
- An expectation that wholesalers should make their smart metering rollout plans publicly available in a consistent, easy-to-understand format (to be determined by the Metering Committee) and publish quarterly reports on delivery from Q2 of 2024/25.
- Wholesalers must ensure that all new data relating to smart metering (e.g. location, asset information, etc) is accurately uploaded to CMOS and that MOSL would monitor the accuracy of the data entered.
- Wholesalers and retailers should work together to determine the best approach to communicating with customers to raise awareness of the installation programme and communicating the benefits of water smart metering.
- Wholesalers will be responsible for 'reading' meters once the meter has been installed and commissioned successfully and is designated 'SmartAMI' in CMOS (in line with CPW142 'Wholesaler Smart Meter Reads').
- Meter readings should be entered into CMOS in accordance with the codes, i.e. at least twice a year.

- To ensure meter data is shared in a consistent format, wholesalers will adopt the Data Standard for Sharing Granular Consumption Data from non-households.

- Wholesalers will make hourly meter read data available online to retailers for all customers with smart metering in an agreed format no later than the end of 2025, with consideration to be given to whether and how charges should be applied beyond an initial set up fee.

- Retailers would be expected to determine the data services they provided to customers, and this would become an important point of differentiation. However, retailers would be expected to facilitate access to consumption data for customers who wish to do so within 12 months of the installation of a smart meter.

- Where retailers are unable to provide data analysis services to customers, wholesalers would be required to provide a minimum standard service either directly or in conjunction with the retailer (covering aspects such as alerts to significant variations in consumption levels and continuous flow alerts).

- Where smart metering is being implemented over more than one AMP period (i.e. beyond 2030) wholesalers should also implement metering improvements to existing legacy meters to improve meter reading performance for Long Unread Meters, 'hard to read' meters, broken meters, old/inaccurate meters, etc.

- An expectation that the market would work together with the energy sector to learn the lessons form its smart metering rollout and that options for the integration of smart metering technology between the energy and water sectors would be considered.

3.3. Additionally, MH noted that options and recommendations for how data can be shared between wholesalers, retailers, customers and third parties would be included in the Strategy once the work on the Data Sharing Process project was completed.

MT and KM joined the meeting.

3.4. The Committee discussed the key points under consideration for inclusion in the Strategy, raising the following key points:

- While the benefit of targeting larger meters as part of a smart meter roll out strategy might seem an obvious point to assist in the deliver of enhanced water efficiency savings, these may already be the most likely meters to have data loggers and customers that are already engaged with the market and driving water efficiency. Therefore, it was possible that greater gains might be found with medium and small metered customers who have higher levels of discretionary water use.

- Smaller meters were disproportionately represented within the legacy long unread, long unread and hard to read meter population and, as these meters are also the ones most likely to have a negative impact on customer billing quality, should be prioritised and have a targeted approach within smart meter roll out plans. However, it was acknowledged that these meters were also likely to be pain points for wholesalers installing smart meters and that an additional specific project or strategy might be required on how to address these meter populations as a follow on to the Strategy.

- The cost for retailers in relation to visual read meters would increase as more smart meters are rolled out and economies of scale for visual meter reading services decrease. This would potentially be exacerbated if legacy long unread, long unread and hard to read meters were not prioritised as part of smart meter roll out plans. It was suggested that a register of hard to read meters could potentially be helpful in monitoring whether these meters were being left behind in smart meter roll outs and a potential tipping point at which read responsibility for all meters was transferred to wholesalers was suggested as a potential consideration.

- Additional clarity would be required on what the additional minimum service provision from wholesalers would comprise. While the Committee was strongly supportive that high variations in consumption and continuous flow alerts should be included, significant concerns were raised around the idea of wholesalers being required to provide direct data access for customers as doing so would go against the principles of the market, require significant investment form wholesalers in the development of a front end customer portal and could muddy the waters in terms of the appropriate point of contact for customers and create confusion.

3.5. MH thanked Committee members for their feedback and noted that this would be considered as the Strategy was developed and worked through with the Strategic Panel's Metering and Data Subset ahead of an initial presentation on the Strategy to the Strategic Panel at its 5 February meeting. MH also noted that further discussion on some of the points raised, including the respective roles of retailers and wholesalers on granular data provision and services, would be picked up at the MOSL CEO Forum.

3.6. The Chair thanked MH for his presentation.

4. Data Sharing Process

DG and DM joined the meeting.

4.1. DG provided a high-level update on project progress, including ongoing engagement with relevant experts on the steps required to successfully implement a Central Data Platform or Peer-to-Peer System and the preparation of the draft project report.

4.2. DM gave an overview of the requirements that will need to be in place to progress either a Central Data Platform or Peer-to-Peer System, these included:

- Identification of all stakeholders, including data providers, data users, and third parties with specific use cases for each stakeholder group detailing what data they need access to and why as well as access rules and permissions.

- A quantification of the value to the market of progressing each option.

- Full identification of potential barriers to implementation (such as data protection, GDPR, licensing and technology and technical systems).

- Full identification of the impact of implementation on the market codes.

- Initial development and establishment of proof of concept prior to implementation.

- Supporting communications and documentation, including training and best practice guidance.

- A plan for how performance of the system will be monitored, evaluated and improved.

4.3. DM also updated the Committee on the work Artesia had undertaken to understand the challenges to establishing standard definitions of continuous flow in the non-household market. DM noted that there was currently no standard definition of continuous flow in either the household or non-household markets and that, in work being undertaken to define continuous flow for the non-household market that it would also be useful for the definition to be transferable to the household market. DM outlined a potential approach to a standard definition that would encompass a minimum flow definition and the number of consecutive days required which would vary depending on the meter size or potential other differentiators in terms of customer segmentation. DM also noted that Artesia would continue to coordinate their work in this area with that of QSP16.

4.4. The Committee welcomed and briefly discussed the update from Artesia, with the Customer Representative emphasising the importance of continuing to consider the impact on customers and interaction with the complaints process of any work being undertaken on the identification of continuous flows, and it was noted that this would be best picked up through the good practice guidance being developed by Quick Start Project 16.

4.5. DG thanked Committee members for their feedback and noted that Artesia were looking to set up a workshop with Icebreaker One to further understand the Peer-to-Peer system model that had been adopted in the banking industry and its potential application in the non-household water market. DG noted that once a date for this was confirmed an invitation would be issued to Committee members.

4.6. The Chair thanked DM and DG for their update.

DG and DM left the meeting.

5. CPW142 'Wholesaler Smart Meter Reads'

5.1. FM provided a reminder of the purpose of CPW142 'Wholesaler Smart Meter Reads' ("CPW142") change, which aimed to transfer responsibility for submitting meter reads into CMOS from retailers to wholesalers where a SmartAMI meter is installed and commissioned, and recapped previous Committee discussions and the process CPW142 has been through as the proposed solution was developed. FM outlined the proposed final solution which was set out in paper MC34_04 and clarified that, following internal review, the solution would not include a notification of read rejection to retailers as including this notification would require a fundamental change to CMOS architecture that would increase the cost and complexity of the change without adding commensurate benefit. FM also confirmed that while the expectation would be for wholesalers to submit a monthly read into CMOS for all smart meters, CPW142 would not make any changes to the Code-mandated meter read performance standards for bi-annually and monthly read meters.

5.2. FM noted that the request for the Committee was to agree whether to endorse the solution ahead of a request for a Detailed Impact Assessment being sent to CGI.

5.3. The Committee discussed the proposed CPW142 solution, noting the following key points:

- While the Committee had some concerns about specific elements of the proposed solution, it remained firmly supportive of the principles and purpose of the change as well as the majority of the proposed solution.

- A number of Committee members retained concerns that the proposed solution did not include a notification of read rejection to the retailer due to the accuracy of smart meter reads and the likelihood that a read rejection on volume validation would not reflect a misread but rather a leak or a change in use. Under these circumstances the Committee members felt it imperative that the retailer engage with the customer as promptly as is possible and viewed any delay in notification of the read to the retailer while the wholesaler reviewed and resubmitted the read would result in a detrimental outcome. However, it was also noted that the process outlined in the proposed solution would result in improvements over the current state and that, so long as reads were resubmitted promptly, any instances of high consumption should be picked up by retailer billing systems (which generally have tighter volume validation tests than CMOS) and that this would prompt retailer engagement with the customer. Furthermore, the ongoing work of Quick Start Project 16 to look at a consistent definition of a continuous flow and the respective roles and responsibilities of retailers and wholesalers in alerting customers to instances of continuous flow should also address this issue.

- A number of Committee members flagged ongoing concerns about the ability of CMOS to process the increasing volume of meter reads that would be generated by smart meters, particularly where wholesalers looked to upload smart meter reads in bulk.

- The idea of amending or removing CMOS validation rules for SmartAMI meters was mooted but it was noted that this was outside of the scope of CPW142. A planned review of CMOS volume validation rules that would be conducted as part of the CPW128 'Volume Validation Tolerance' post-implementation review (and was scheduled for May 2024) was noted and it was suggested that how volume validation should be applied to SmartAMI meter reads should be picked up as part of this review.

- The CPW142 documentation would need to include the following elements to provide additional clarity for market participants:

  - CMOS processing capacity limits and how these would be managed as more smart meters are rolled out and the responsibility for entering smart meter reads into CMOS transfers from retailers to wholesalers (and how a read date should be specified if CMOS processing capacity affects the scheduling of wholesaler read submissions).

  - The point at which a meter should be classified as SmartAMI in CMOS.

  - Whether there would be a process through which meters classed as SmartAMI could revert back to visual read meters in CMOS and how this would be agreed between the retailer and wholesaler.

  - How the bilateral process used for raising issues with SmartAMI meters should be used and associated SLAs given manufacturer guidance on the timeframe for investigating a SmartAMI meter that has stopped transmitting data.

5.4. Following discussion, the Committee:

- **AGREED** to endorse the proposed solution subject to the resolution the issues raised in relation to CMOS processing capacity limits, volume validation tolerance and how customers will be alerted to high consumption and the ability of meters registered in CMOS as SmartAMI to revert to visual read meters in exceptional circumstances.

5.5. The Chair thanked FM for her presentation and noted that a revised version of the proposed solution would be worked up and circulated with a request for approval ex-Committee prior to the next Committee meeting in February (where the Committee would be asked to endorse the CPW142 Draft Recommendation Report prior to its presentation to the Code Change Committee in March).

6. QSP17 Internal Meters

6.1. The Committee noted a brief update on the development of the draft Internal Meter Access Guidance. SB outlined the draft process, which was designed to encourage collaboration, and noted that Committee members were being asked to review the draft Guidance and provide feedback ex-Committee by 28 January.

6.2. The Committee briefly discussed the update provided, noting that further clarification was required on the ability of wholesalers to move customers to assessed charges at the end of the process.

6.3. The Chair thanked SB for the update.

7. Tabled Updates

7.1. 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. AOB, including reflections from the meeting

8.1. The Committee reflected on the meeting.

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