

Minutes of the Metering Committee Meeting 35

20 February 2024 | 09:30 – 13:30

Via MS Teams

Status of the Minutes: Approved

MEMBERS PRESENT

Steve Formoy	SF	Alternate Chair*	Angela Brown	AB	Wholesaler Member
Christina Blackwell	CB	Customer Representative Member	Kevin McCalliskey	KM	Wholesaler Member
Lisa Clarke	LC	Retailer Member Alternate	Rosie Rand	RR	Wholesaler Member
Sindiso Bango-Dube	SBD	Retailer Member	Michelle Thompson	MT	Wholesaler Member
Mark Doherty	MD	Retailer Member	Mitchell Yeoman-Boldry	MYB	Wholesaler Member
Chris Dawson	CD	Alternate MOSL Affiliate Member*			

**Non-Voting Members of the Committee*

OTHER ATTENDEES

Martin Hall	MH	MOSL Presenter	Alex Cowie	AC	MOSL Secretariat
Simon Bennett	SB	MOSL Presenter	Florentina Monea	SM	MOSL Presenter
Adrian Smith	AS	MOSL Presenter	Dave Gough	DG	Artesia Consulting Presenter
Ivy Mandinyenya	IM	MOSL Presenter	Liz D’Arcy	LDA	MOSL Observer

Jacquelyn Gibson	JG	MOSL Observer			
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APOLOGIES

Spencer Mattia	SM	Chair	Paul Heron	PH	Retailer Member
Richard Barton	RB	Retailer Member	Claire Stanness	CS	Retailer Member

1. Welcome, Apologies and Compliance

- 1.1. The Chair welcomed everyone to the Metering Committee (“Committee”) meeting and noted that apologies had been received from SM, CS, PH, KM and RB and that LC would be standing in as CS’s alternate. The Chair also noted that MT would join the Committee slightly late, and that CB would only attend until midday.
- 1.2. The Chair noted that he would need to leave the meeting shortly before midday and it was agreed that CD would step in as Chair for the remainder of the meeting at that point.
- 1.3. 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.
- 1.4. 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 January 2024 as an accurate record of the meeting subject to no further substantive comments being received from CB who had requested more time to review the draft minutes.
- 2.2. The Committee agreed that the following actions would be closed: A32_01.
- 2.3. The Committee noted an update on the following actions, which would remain open: A15_05, A16_02 and A29_02.
- 2.4. The Committee noted a request from AC to review the draft feedback on Code Change Committee effectiveness that had been prepared on behalf of the Committee and circulated

by email and to provide any comments, additions or amendments to AC by close of business on Monday 26 February.

3. Data Sharing Process

DG joined the meeting.

3.1. The Committee noted an update from Artesia on their progress in developing options for the sharing of granular consumption data. The update included:

- Stakeholder engagement undertaken since the last Committee meeting, which included further discussions with Icebreaker One (with whom a further workshop had been scheduled for 26 February), MOSL and Anglian Water.
- Work undertaken to assist in the development of a definition of continuous flow for the non-household market, which had included analysis of 8,206 smart metered non-household premises and which had been fed into the work of QSPXX 'Continuous Flow'.
- Progress in the development of the three potential options for sharing granular consumption data, which included an initial assessment of the relative strengths and weaknesses of the organic growth, central platform and peer-to-peer options. This initial assessment had concluded that organic growth would be the highest cost option, peer-to-peer the lowest cost option and central platform mid cost.

3.2. Following a request for clarification, DG noted that the Icebreaker One workshop was open to all Committee members and interested parties.

3.3. The Committee briefly discussed the update provided noting the following key points:

- There was some surprise expressed that governance was listed as a potential strength of the peer-to-peer model, and it was observed that this was something that had worked well in the banking industry and the feeling was that this would be replicable as long as a good framework was in place with clear standards. It was noted that further detail on how the governance framework for the peer-to-peer model could work would be provided as part of the Icebreaker One workshop.
- How the costings for the different options had been developed was discussed with some Committee members of the view that the Central Platform model would be the

highest cost option. It was observed that wholesalers would still need to develop their own systems regardless of which option was taken and therefore would not incur savings in this area were any option other than organic growth to be taken forward. It was also observed that wholesalers would need to build their own systems regardless of the model taken forward because of their role in the household market.

- Retailer Committee members stressed the importance of, whichever option was taken forward, having processes and systems that are standardised to such an extent that retailers would not need their own platforms and could instead rely on a method to obtain and transfer the relevant data. With this in mind, the importance of having a clear strategy and approach set out as soon as possible was emphasised to allow companies to build their systems in a streamlined and consistent way and avoid duplicated and unnecessary work.

LC temporarily left the meeting.

- The importance of the final Artesia report containing as much information as possible on what needs to be done to come to a final decision on a preferred option (and the timeline for doing it) was stressed as was the importance of getting to this decision as quickly as possible. Additionally, the final report should also set out what steps need to be taken in the short and medium term to ensure that the market is as well set up as possible prior to the decision on a preferred solution being taken.
- The question of whether household data could be held in the same central hub as non-household data was raised, but it was agreed that this would need further work to understand whether it was either feasible (especially from a data protection perspective) or desirable.

3.4. Following the discussion, DG provided an overview of upcoming key dates for the project, which included:

- Expected circulation of the draft report to Metering Committee members on 21 February.
- A workshop with Icebreaker One on 26 February.
- The final meeting of the project working group on 05 March.

- The deadline for feedback from Committee members on the draft report on 15 March.
- Expected publication of the final report on 29 March.

3.5. The Chair thanked DG for his presentation, and it was noted that any feedback on the draft report should be sent directly to DG and DM, copying in MH.

4. CPW142 ‘Wholesaler Smart Meter Reads’

4.1. The Committee noted the CPW142 ‘Wholesaler Smart Meter Reads’ (“CPW142”) Draft Recommendation Report (“DRR”) which had been circulated in advance of the meeting along with slides detailing discussions held since the last Committee meeting and subsequent areas that had been clarified or amended within the solution (paper MC35_03a) as well as a brief verbal update from FM.

4.2. The Chair emphasised the helpful inputs that had been received from Committee members and thanked MT and RR for taking the time to meet with the team and walk through their concerns and how these could be addressed, noting that it was a great help in developing the solution to be able to draw on the experience of those at the forefront of smart metering roll outs. The Chair emphasised that, following these discussions, MOSL had committed to looking at volume validation tolerance thresholds in May as part of CPW128 post implementation review and that, while a Code change to address CMOS processing capacity issues wasn’t seen as necessary at this stage, it was a high priority area for the MOSL digital and data team and that further guidance and clarity on the approach being taken would need to be developed as soon as possible with its impact on processing capacity (and any potential need for further formal intervention) kept under review.

4.3. The Committee discussed the CPW142 solution and DRR, noting the following key points:

- While MOSL’s commitment to addressing CMOS processing capacity issues was welcomed, the wording would benefit from strengthening to emphasise the point that MOSL is committed to ensuring that the solution put in place has the desired impact. This strengthening of the wording could also apply to any of the commitments MOSL has made within the DRR to take action to address the issues identified that fall outside of the scope of the Code change.

- The Committee was pleased to note that the review of CMOS volume validation tolerance had been brought forward and noted that the review should take into account where there is genuine consumption on an infrequent or seasonal basis that would far exceed the 300% tolerance levels and see whether there is a way to avoid such reads being rejected.
- The wording within the DRR could be strengthened to provide greater assurance on the rationale for why the Committee were comfortable with the notification of rejection to retailers being removed. This could be done by expressly stating that there was an expectation that existing processes that are in place to make customers aware of high consumption will remain in place and that this change will not affect these processes. It was also noted that one of the findings from Project AMIDST was that, while there was an initial spike in rejections following the installation of a smart meter, the majority of rejections fall away once the cycle of smart reads being entered into CMOS is in place. Following the initial instance of read rejections, further read rejections for smart meters are generally where there is a leak and it should be emphasised to wholesalers that smart meter reads that fail volume validation tolerance should be processed as re reads as soon as possible.

LC rejoined the meeting.

4.4. FM briefly summarised the areas for inclusion in the CPW142 Post Implementation Review (“PIR”), which were:

- Wholesaler submission of reads: the percentage of wholesalers’ SmartAMI meters that have reads submitted into CMOS; the percentage of SmartAMI meters that have no reads submitted.
- Removal of accepted S reads: the PIR will look at whether any issues with the removal of accepted reads are encountered as well as the number of instances and reasons this request was needed (the number of F7 queries raised).
- Rejection of SmartAMI reads: the PIR will look at the number of rejected reads submitted by wholesalers that have not been subject to a re-read and the reasons for it.

- SmartAMI back to non-smart: the PIR will look at the number of SmartAMI that reverted back to non-smart. The PIR may require interviews to be conducted with those trading parties who needed to use this exception and understand the experience.
- Data accuracy assumptions: the assumption that data accuracy in CMOS leads to accurate customer billing should be investigated further during the PIR. It is essential to determine whether this assumption holds true and whether retailers are using the data in their billing systems as expected. Investigating the reasons behind this and addressing the issue is important to ensure accurate billing and customer satisfaction.
- Settlement accuracy: to depict a view of increased accuracy of settlement, the PIR will look at the settlement parity (the difference between R1 and R3) where SmartAMI meters are installed.

4.5. The Committee briefly discussed the areas for inclusion in the CPW142 PIR, noting that it would be important to monitor how quickly high consumption is flagged and how retailers are addressing any potential customer bill shock. Additionally, any clash between how retailers are handling instances of high reads and related bill shock with customers and how wholesalers are approaching settlement should also be monitored. These were seen as important areas that should not necessarily wait for the formal PIR 12-18 months after implementation of the Code change and should be monitored and addressed on an ongoing basis.

4.6. Following the discussion, RR provided some specific drafting points, noting the following:

- The impacts for trading parties and MOSL outlined in section 2.4 of the DRR should be amended to detail some the negative impacts that are described elsewhere in the document.
- Additional nuance should be added to section 4.1 of the DRR to emphasise that while CPW142 won't dramatically change the use of smart meter reads (whose usage may be hidden from current analysis because of how they are uploaded into CMOS) it will remove the doubling up of work that is required to submit them as settlement affecting reads at present.
- Within section 5.1, the statement that "Wholesalers will provide assurance that the reading on the physical meter register is the same as the reading taken by the smart metering

system both at the time of commissioning and during the life of the meter.” Should not be taken to mean that the wholesaler is required to provide physical assurance of any and every read that is challenged. The purpose of this section is a requirement for wholesalers to assure themselves of meter performance over the life of the asset in compliance with their own stated and published policy.

- The costs of processing bilaterals requests was currently missing from section 5.3.2 and should be added.

4.7. It was also suggested that CMOS processing capacity should be included as part of the CPW142 PIR, however it was noted that this would not be included within the PIR as it was not a part of the Code change.

4.8. Following discussion, the Committee:

- **AGREED** to endorse the CPW142 solution; and
- **AGREED** to endorse the Committee views sections of the CPW142 Draft Recommendation Report.

4.9. The Chair thanked FM for her presentation and noted that the requested amendments to the CPW142 DRR would be incorporated and a revised draft DRR would be circulated to the Committee for information along with a note detailing the changes made as soon as possible.

ACTION MC35_01

5. National Metering Strategy

5.1. The Committee noted an update from MH on the progress in developing the draft National Metering Strategy, including feedback from the 05 February Strategic Panel meeting.

5.2. MH summarised the feedback from the Strategic Panel as being supportive of the strategy and noted the following points and challenges raised:

Technology

- The Strategy should be ‘Technology agnostic’ – need to emphasise need to deliver minimum data standards and confirm technology ‘future proof’.

- Technology should continue to support data loggers where customers express a need for such consumption data.
- Retailers should continue to be able to install smart metering solutions while wholesaler smart meter roll outs are ongoing, however when a smart meter is installed the expectation is that at this point that becomes the smart metering solution for the customer.

Company plans

- Panel were of the view that Price Control Deliverables (PCDs) should be put in place that incentivise companies to:
 - Include NHH meters in smart meter roll outs;
 - Deliver smart meter installations for medium and large meters;
 - Focus on business customers that can realise greatest benefit.
- The Market Performance Framework Reform programme should consider incentives for sharing plans and data in CMOS.
- There should be regular tracking report of smart meter roll outs by region that allow customers to understand when they can expect a smart meter to be installed and whether roll outs are being delivered as expected.

Data

- Panel accepted the principle of transferring responsibility for reading smart meters and entering data into CMOS on monthly basis to wholesalers.
- Consideration should be given to a customer code of protection.
- Panel emphasised the principle that data must be easy for Retailers to obtain and use.
- Panel agreed that retailers should be responsible for providing data-related services to customers.
- Mandated services should be kept to absolute minimum, e.g. high usage alerts, continuous flow.

- The idea that granular consumption data should be ‘free of charge’ was too simplistic and but it is reasonable for Wholesalers to be required to provide data free of charge when this provision is included in price control. Beyond this, wholesalers should be allowed to recover costs for services not included in price control.

5.3. The Committee reflected on the feedback from the Strategic Panel meeting, noting the following points:

- The ability of wholesalers to deliver smart metering technology that is pulse output loggable could be limited by the technology available, particularly with regard to small and medium sized smart meters. An appendix to the Strategy that explains that in some circumstances the ability to install a logger may be limited by constraints in the available technology.
- An increase in the number of third parties that are looking to get access to smart meter data to provide consumption data services to customers was noted.

SF left the meeting and it was noted that CD would take over as Chair.

5.4. Following discussion of the Strategic Panel feedback, MH noted the challenge for the Strategy in ensuring data is used for minimum water efficiency measures (e.g. high usage alerts, continuous flow) while not undermining competition between retailers or incentives to innovate. MH outlined the current proposals for inclusion in the Strategy which relate to this point. These are:

- Wholesalers to makes data available to retailers (Artesia to outline three options for doing so).
- Retailers set out data-related services they plan to offer, subject to minimum ‘backstop’.
- If minimum services are not included, the retailer is expected to work with the wholesaler to provide or allow them to provide these services directly to customers.

5.5. The Committee reflected on these proposals noting that, in addition to setting out their data service plans, retailers should also include clarity on how they will work with wholesalers to deliver these services and support customers. Additionally, the Operational Delivery Incentives (“ODIs”) associated with the DEFRA 9% consumption reduction target may mean that wholesalers are incentivised to take action where retailers are not delivering on services

to enable reduced consumption. In this context, retailers clearly communicating what their offerings are and what they are doing is crucial to avoid wholesalers taking action where it is not appropriate because of the pressure applied by the ODI.

5.6. MH noted the timeline to completion, which included various touchpoints with the Strategic Panel Metering and Data Subset, the Panel itself and the Committee building towards publication of the final National Metering Strategy by the end of March.

5.7. The Chair thanked MH for his update and Committee members for their continued input and support in the development of the National Metering Strategy.

6. QSP16: Continuous Flow

6.1. The Committee noted an update from RR on the development of draft Non Household Market Continuous Flow Good Practice Guidance. This included an overview of the analysis undertaken by Artesia which showed the difference that alternative definitions of continuous flow would have on the 8,206 meters which they had looked at. Based on Artesia's analysis, a definition of continuous flow for identifying continuous flow was proposed which described it as a minimum volume of one litre an hour for a continuous period of 14 days (based on hourly meter reads). While continuous flow would be defined on the basis of one litre an hour consumption an action trigger for continuous flow for water demand reduction was proposed which described continuous flow as a minimum volume of ten litres an hour for a continuous period of 14 days (based on hourly meter reads). It was recommended that the definition for water demand reduction was applied for non-household properties with average consumption of less than 11,000 litres per day and that further data was required to analyse the application of this definition to premises with higher consumption rates to minimise the chances of legitimate consumption being identified as continuous flow. RR noted that 14 days had been chosen as the definition period as it reduces the risk of including short-term continuous flow within the definition while still allowing for rapid detection. Continuous flow action triggers would only be based on smart meter reads under the proposed guidance. Prioritisations were also proposed as part of the guidance with continuous flow above 300 litres an hour being identified as requiring immediate response.

6.2. RR also provided an overview of the additional information that would be included within the guidance such as the types of continuous flow that would be present (external leak, internal wastage and genuine consumption) and examples of these types. The guidance would also

detail the roles and responsibilities of wholesalers and retailers in the event of continuous flow being identified.

6.3. The Committee briefly discussed the update provided, noting that:

- It would be important to ensure that the continuous flow definition and guidance did not trigger an insurmountable level of activity and that an assessment of this could be pulled out of the data analysis undertaken by Artesia.
- It would be useful to have a mechanism for retailers to feedback on where any action has been undertaken to address continuous flow.
- Care would need to be taken in defining the roles and responsibilities of retailers and wholesalers in relation to identifying and communicating continuous flow. In this context work being undertaken on retailer-wholesaler collaboration by the Retailer-Wholesaler Group Water Efficiency Subgroup was noted and it was suggested that they should be briefed on the work of QSP16 to ensure alignment.

6.4. RR thanked Committee members for their feedback and asked that any further specific points on the draft guidance should be sent through to her directly so the QSP16 working group can take them into account as they work towards a final version which is due to be brought to the April Committee meeting for approval.

6.5. The chair thanked RR for her update and all of the work she had put into the development of the guidance.

MD and MYB left the meeting

7. QSP8: Transfer Reads

7.1. The Chair noted that a full update on QSP 8 would be moved to a subsequent Committee meeting in the interests of time and a fuller development of that Project's proposals but that IM would debrief the Committee on the findings of a six-month review of the use of estimated transfer reads reason codes following the implementation of CPW130 'Transfer Read Estimated Reason Codes' ("CPW130") in May 2023.

7.2. IM briefly recapped the purpose, background and solution provided by CPW130 which introduced additional skip codes into CMOS, alongside additional clarification on their

definitions in order to address the use of inaccurate skip codes which were leading to an increase in estimated transfer reads.

7.3. IM summarised use of the new transfer read estimated reason codes and suggested next steps which were as follows:

- The new skip code 'No Transfer Read Attempted' had been used 12,653 times (representing 71.54 per cent of the total skip code reasons recorded since CPW130 was implemented). IM further noted that the expectation was that this skip code would only be used where a retailer is transferring a large multi-site customer and the timescales for transfer do not allow all meter reads to be obtained. IM outlined a suggested next step, which was to issue a reminder to the market of the estimated reason code definitions and specifically the circumstances under which 'No Transfer Read Attempted' should be used.
- The new skip code 'Cannot Access Premises' had been used 2,961 times (representing 16.74 per cent of the total skip code reasons recorded since CPW130 was implemented). IM outlined a suggested next step, which was to share the detail of use of this reason code with QSP17 'Internal Meter Access' and the RWG Access Subgroup.
- The new skip code 'Customer Read Incorrect' had been used 897 times (representing 5.07 per cent of the total skip code reasons recorded since CPW130 was implemented) and that the suggested next step was for MOSL to discuss use of this reason code with the trading party who had used it most frequently.
- The new skip code 'Cannot Locate Meter' had been used 796 times (representing 4.5 per cent of the total skip code reasons recorded since CPW130 was implemented) and that the suggested next step was to review bilateral requests against transfer dates for the meters where this reason code had been used.
- The new skip code 'Meter Temporarily Obstructed' had been used 77 times (representing 0.22 per cent of the total skip code reasons recorded since CPW130 was implemented) and that there were no suggested next steps for this reason code.
- The new skip code 'Cannot Locate Premises' had been used 66 times and that the suggested next step was to share the information for which meters this had been used for with the Data Assurance Programme team.

- The new skip code 'Meter Damaged' had been used 54 times and that the suggested next step was to review bilateral requests against transfer dates for the meters where this reason code had been used.
- The new skip code 'Health & Safety Issues Accessing Meter' had been used 47 times and that the suggested next step was to review bilateral requests against transfer dates for the meters where this reason code had been used.
- The new skip code 'Meter Buried' had been used 39 times and that the suggested next step was to review bilateral requests against transfer dates for the meters where this reason code had been used.
- The new skip code 'Meter Removed' had been used 36 times and that the suggested next step was to review bilateral requests against transfer dates for the meters where this reason code had been used and to use a 'Toolbox Talk' to remind trading parties of processes for meter replacement and removals.
- The new skip code 'Dials Not Visible' had been used 24 times and that the suggested next step was to review bilateral requests against transfer dates for the meters where this reason code had been used.
- The new skip code 'Meter Permanently Obstructed' had been used 20 times and that the suggested next step was to review bilateral requests against transfer dates for the meters where this reason code had been used.
- The new skip code 'New Meter In Situ' had been used 13 times and that the suggested next step was to undertake a 'Toolbox Talk' on meter changes and their impact.

7.4. The Committee briefly discussed the update provided, noting that it would be useful to understand whether any of the estimated transfer reads had a W read against them.

7.5. Following discussion, the Committee:

- **AGREED** the suggested next steps.

7.6. The Chair thanked IM for her presentation, and it was noted that where a proposed action did not identify who should take it forward these would be picked up by MOSL and the QSP8 'Transfer Reads' working group as appropriate.

8. QSP18: Logger to Smart Meter Switching Process

- 8.1. The Committee noted a brief update from SB on behalf of RB on the progress of QSP18 ‘Logger to Smart Meter Switching Process’, which was looking to address issues with existing processes for providing a notification that a data logger is being fitted, the recording of fitted data loggers in CMOS and how retailer devices (such as a limpet/jellyfish) should be recorded in CMOS.
- 8.2. The Committee noted that the following potential solutions were being proposed by the QSP18 working group:
1. Allowing data item 3106 to be updated by the retailer as well as the wholesaler.
 2. Changing Data Item 3106 name from “Datalogger (Non-Wholesaler)” to “Datalogger/Add-on device (Non-Wholesaler)” to allow add-on devices to be registered.
 3. Creating Data Item XXXX Add-on Device (Non-Wholesaler), with the retailer as the data owner, to allow add-on devices to be registered in CMOS.
 4. Retailer to use Bilateral F7 Process to register with wholesalers that data loggers or add on devices have been fitted to a meter. Wholesalers would then be expected to update CMOS data item 3106 within F7 level of service (noting that this solution would need to be agreed and taken forward with the Bilateral Programme team).
 5. Creating a new Bilateral process for Data Logging (including add-on devices). This solution would need to be agreed and taken forward with the Bilateral Programme team.
- 8.3. SB noted that RB and the QSP18 working group would recommend taking forward options 4 and 5, and that there had been positive discussions with the Bilateral Programme team around solution 5 and that a decision in relation to whether to take this forward was expected later in the year.
- 8.4. While some Committee members expressed their support for taking forward options 4 and 5, SB requested that Committee members provide feedback to him and RB by email ex-Committee.
- 8.5. The Chair thanked SB for his update.

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.

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.