

Minutes of the Metering Committee Meeting 52

15 July 2025 | 09:30 – 12:35

Via MS Teams

Status of the Minutes: Approved

MEMBERS PRESENT

Spencer Mattia	SM	Chair*	Michelle Thompson	MT	Wholesaler Member
Ben Kershaw	BK	Retailer Member	Rosie Rand	RR	Wholesaler Member
Paul Heron	PH	Retailer Member	Steve Formoy	SF	MOSL Affiliate Member*
Sindiso Bango-Dube	SBD	Retailer Member			
James Mackenzie	JM	Customer Representative Member			
Angela Brown	AB	Wholesaler Member			

**Non-Voting Members of the Committee*

OTHER ATTENDEES

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

APOLOGIES

Jordanna Lo	JL	Retailer Member	Kevin McCalliskey	KM	Wholesaler Member
Mitchell Yeoman-Boldry	MYB	Wholesaler 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 JL and MYB.
- 1.2. The Chair drew attendees’ attention to the MOSL recording policy and reminded members that, in line with section 5.7 of the Market Arrangements Code (“MAC”), they were to act impartially and not in the interest or as a representative of any organisation or individual.
- 1.3. It was confirmed that the meeting was quorate.

2. Minutes and Actions from Previous Meetings

- 2.1. The Committee agreed to approve the minutes of the Metering Committee meeting held on 17 June 2025 as an accurate record of the meeting.
- 2.2. The Committee acknowledged CPW118 is scheduled for discussion and closed A51_01.

3. Smart Meter Read Hub

- 3.1. The Committee received an overview of the progress made in delivering Phase 1 of the Smart Meter Read Hub.
- 3.2. SM advised that the smart meter read hub is being developed to facilitate the rollout of smart meters, with the intention of delivering greater efficiency, standardisation, and lowering barriers for retailers, while also enhancing customer service. The strategic panel assigned MOSL, in collaboration with the Metering Committee, to review various options and develop a full business case. The business case was subsequently reviewed by the Committee and approved in June. SM further reported that, on 14 July, it was confirmed that CGI would be engaged as the delivery partner for the development of the system. SM further went on to discuss the objectives noting that the primary objective centres on achieving increased

operational efficiency through measures such as cost reduction, standardisation of procedures, and the removal of entry barriers for retailers particularly regarding system development for market participation. These initiatives are anticipated to also improve customer service delivery. The secondary objective aims to establish an efficient and resilient process for submitting reads to CMOS for settlement, ensuring scalability to manage future growth in data volumes. This approach seeks not only to capture essential data but also to safeguard CMOS against expected increases in data flow, supporting its utilisation for reporting smart tariffs, and other prospective developments.

- 3.3. The Committee received a detailed overview of the Programme team, which adheres to the standard MOSL programme structure. The Strategic Panel acts as the programme sponsor, with Simon Powell, Chief Information Officer, serving as Programme Director. Spencer Mattia is appointed as Programme Manager and will coordinate closely with Chris Dawson, Lead Project SME, who will also liaise with Amanda Heind from Market Design to ensure effective management of all code documents. Ricardo Wisseman-Alves holds responsibility as Delivery Manager and is currently collaborating with both the team and CGI on requirements. Amy English fulfils the role of Business Analyst, and Adrian Smith will oversee communications for the programme. Additionally, an internal governance procedure has been implemented, requiring monthly reports to the portfolio board. A steering group will be formed with members from MOSL's SLT, an Ofwat Panel representative, a CCW member, and individuals from wholesalers and retailers. Quarterly reports will be submitted to both the board and the strategic panel, followed by updates to the Metering Committee. External webinars and forums will be available, open for participation and attendance by interested parties.
- 3.4. The Committee received an overview of the delivery plan, noting that the MOSL board and panel have also selected an approved supplier to collaborate on the project, and that the first Smart Meter Advisory Forum (SMAF) has now taken place. The session aims to clarify the requirements for both Phase One and Phase Two, with the timeline targeting completion of Phase One requirements and the establishment of objectives for Phase Two by the end of August. Managed as a waterfall programme rather than an agile one, the project seeks to deliver a proof of concept for Phase One, with substantial development to be finished by year-end. Furthermore, testing activities and engagement with early adopters are planned for the fourth quarter, in advance of the scheduled go-live at the end of the financial year. As phase one moves through its development and testing stages, phase two will commence accordingly. Prior to launch, the team will revise market codes and update all pertinent legal

documentation, including the user agreement and data privacy notices. SM remarked that consultations on these matters are scheduled to take place over the coming months. Furthermore, SM explained that as part of ongoing business planning, a possible future phase of the programme may be discussed in forthcoming sessions. Accordingly, this has been highlighted as a potential development rather than a formally agreed initiative. At present, there are no specific requirements defined for phase three. It was reported that the target is to go live in the first quarter of 2026, preceded by user acceptance and integration testing in preparation for the year-end CMOS release to enable hub integration. A hypercare period will follow, and requirements for future phases are expected to be gathered during summer 2026.

- 3.5. The Committee was advised that the terms of reference for the Steering Group has been drafted and agreed by MOSL Governance. Noted that the final approval is pending from both the Strategic Panel and the MOSL Board, with a decision expected within the week. SM advised that upon approval, communications will be distributed inviting trading parties to submit nominations for participation in the Steering Group. The initial meeting is planned for the first week of September. SM advised that individuals interested in joining the Steering Group should formally express their interest by contacting a member of the MOSL team via email or nominating suitably qualified colleagues. CD noted that the initial Smart Meter Read Advisory Forum (SMAF) would take place on Thursday, 17 July. This introductory session aims to ensure all participants are aligned, beginning with high-level questions and gathering feedback in subsequent meetings. Further requirements will be provided in subsequent sessions, allowing members to identify potential gaps and pose relevant questions. CD emphasised the ongoing commitment to transparency during this process, and all Committee members are encouraged to participate in the forum. The Committee was informed that the main requirements for phase one had already been defined and understood. The initial delivery would focus on developing the hub itself, enabling wholesalers to input data into the data hub and allowing retailers to retrieve information as required. Building on previous discussions, CD highlighted that factors such as input and output requirements, access rights and permissions, and data validation processes had all been thoroughly considered. Additionally, CD provided further clarity through a diagram illustrating enhanced features and greater process complexity, which helped demonstrate how the system would function in real-world scenarios. Furthermore, CD explained that, as referenced by SM, phase two will concentrate on CMOS integration and the effective management of data exchange and aggregation. It was noted that government bodies such as Defra and Ofwat would be granted

access to aggregated data in this phase. CD stated that phase two's main deliverable is CMOS integration, with next steps involving engagement with the Smart Metering Advisory Forum. The Committee was informed that the Smart Meter Read Advisory Forum will meet in July/August to finalise requirements by August, with Steering Group recruitment also taking place in July/August and the first meeting set for September.

- 3.6. JM proposed considering skip codes in the context of AMI meters, suggesting that the requirements stage should also examine whether the smart meter data hub could streamline other processes. For instance, JM raised the idea that, if all smart meters were linked to a central hub, any failure to transmit data as scheduled could automatically trigger a notification to the relevant wholesaler. In this way, the smart meter data hub would offer benefits beyond simple data storage. MT supported JM's point, stressing that existing reporting could be used to trigger alerts and should be integrated with the bilateral hub to improve visibility of ongoing arrangements, especially when hub data is missing. SM and CD agreed, noting the advantages of this approach. JM then asked if the hub would track the smart meter rollout. CD confirmed, explaining that the smart AMI flag in CMOS is currently used for this purpose, and the hub could also support monitoring progress for similar reasons. RR raised concerns about the tight programme timeline, especially the March delivery date and potential challenges for the digital team. RR also stressed the need for clear expectations regarding data transfer and the implications for internal processes. Furthermore, RR highlighted the importance of understanding forthcoming data governance and sharing agreements. In response, CD clarified that the data governance framework is under legal review, with plans to consult Data Protection Officers within the next two months. CD confirmed that, following these discussions, further updates would be provided and that the approach had previously been presented to the Metering Committee. The same approach will now be shared with Data Protection Officers to ensure satisfaction with amendments to user agreements and market data assurance documentation. CD indicated this process would conclude in the coming months.

4. Strategic Metering Update

- 4.1. The Committee received an overview of the Metering program, including updates on the program's milestones. This raised the following points of discussion:

- CD reported to the Committee that 13 out of the 17 targeted projects have commenced, with 3 already completed. Furthermore, there is an objective to expand the initiative to 23 projects. CD assured the Committee that regular progress updates will be provided as developments occur.
- CD reported that the data sharing mechanism project has been completed and is currently progressing as planned. Additionally, CD reminded the Committee that an update on this matter was provided under the previous agenda item.
- CD noted that AR will present the update on the Settlement Review, providing the current status of the strategic review of settlement.

4.2. AR provided an update on the Settlement Strategy review noting that the first working group convened in July and that a position paper had been circulated for market consultation, resulting in fifteen responses. AR observed that the submissions offered constructive feedback and valuable suggestions, and discussions to address these points are ongoing. The overall feedback, AR reported, indicated broad support for both the long-term strategy and its key objectives. However, some contributors requested greater involvement of market stakeholders, suggesting that while the position paper referenced customers and the wider environment, it could more explicitly include other market participants. AR highlighted that there was general agreement on the proposed principles, although several comments were made about cost neutrality, cost effectiveness, and the precise language used. There were also recommendations to strengthen governance and accountability, such as clarifying how the Strategy intends to measure the success of the strategy and track improvements to market codes and settlement processes. It was therefore recognised that additional work is necessary in this field. AR also outlined the proposed workstreams and core themes, identifying post-RF and unplanned settlement runs as primary priorities. These topics have consistently contributed to market friction, particularly since 2019. AR observed that these issues would receive focused attention in the upcoming year. Furthermore, the frequency of settlement, from P1 through RF, remains under consideration, especially in light of the increased rollout of smart meters and the resulting rise in meter reads within CMOS. As a result, the appropriateness of the current sixteen-month schedule for all customers will be thoroughly assessed, with adjustments considered where warranted.

4.3. It was noted that eleven parties volunteered for the working group, and consequently, initial feedback was reviewed in detail. Furthermore, AR reported that the meeting saw thorough discussion regarding the strategy's implementation, scope, and its integration with other

market programmes. Notably, key points included the importance of avoiding duplication of effort, maintaining clarity and efficiency, and considering future developments in water efficiency and charging methods. However, AR cautioned against unnecessary complexity at this stage. Moreover, AR cautioned against investing in infrastructure that could ultimately prove redundant, thereby highlighting the importance of avoiding wasted resources. Consequently, they recommended careful consideration of how the strategy's themes and projects might interact with one another, as well as with other industry activities. For example, AR noted that self-serve settlement could influence engagement with unplanned or post-RF settlement runs. Furthermore, drawing lessons from other utility sectors may offer valuable insights that inform pricing strategies. As a result, the group agreed to revisit strategy priorities at future meetings, and AR reminded the Committee about sessions scheduled for August and September. Looking ahead, the next phase involves consulting the market on the draft strategy, which is anticipated for mid to late September. In respect of level two projects, CD noted that the interim guidance has been downloaded more than 250 times. Feedback from Affinity Water resulted in a minor amendment, but no major or structural changes were necessary. CD invited additional feedback from Committee members. A discussion regarding the continuous flow will be scheduled soon to determine if it should start in September, and members have been notified. In addition, the transfer reads consultation closed the previous week, and CD anticipates that OB will provide at least an initial position or preliminary feedback on the consultation in August. Further reporting changes under the 'no flow' category are under consideration. Meter read obligations are also scheduled for further discussion during the meeting.

- 4.4. MT highlighted the absence of a no flow report and reiterated the importance of linking these efforts to the bilateral hub. Emphasis was placed on verifying whether an open bilateral exists for identified no flows to prevent duplication and ensure investigations are not repeated. JD recommended proposing a discussion point for review in a month, noting the relevance of the RWG skip codes group and its connection to the transfer read process. The recent transfer read consultation prompted remarks, as one expectation for retailers was to attempt a read or conduct a reread, with this language broadly consistent with other sections of the codes, though not present in the main part currently followed by retailers. JD recommended that the RWG group consider whether, with the introduction of skip codes, the code obligation regarding meter reading should be reframed as a read attempt. The question of ownership whether this should reside with the Metering Committee or the RWG group was raised, with

JD suggesting a review in a month as the group develops its approach. JM clarified that current retailer obligations require a meter reading, yet recent documentation refers only to attempted reads, highlighting a conflict with existing requirements. The distinction between retailers failing to attempt reads and those facing genuine difficulties was emphasised. Consequently, JM queried whether the codes should be amended or simply reconsidered, and whether the RWG should investigate the issue, reporting back for further deliberation by the Committee.

- 4.5. SF agreed with JD's earlier point, highlighting that a workstream is already reviewing all meter reading obligations this year. SF proposed integrating current efforts into this broader review, with the metering committee taking the lead due to its role. SF also noted the RWG's valuable input and hoped their work would support the committee and minimise duplication. JD concurred with SF's observations and committed to providing regular high-level updates as the group develops its model, noting that progress is at an early stage. SF raised concerns about ambiguous language in some documents, especially regarding actions required when meter reads are not taken and stressed the need for clear follow-up to ensure meter accessibility. JM clarified that the codes specify requirements for meter reads and suggested skip codes could add value if processes for retailers remain straightforward. Both SF and JD highlighted the importance of distinguishing between retailers not fulfilling obligations and those facing genuine external barriers. JD will keep the committee informed as the group's work advances.

ACTION:52_01

- 4.6. The chair thanked CD and AB for their update.

5. New meter trend report (requests from TPs)

- 5.1. The Committee were informed of the new meter trend report and the requests being received from trading parties.
- 5.2. LDa explained that in addition to providing a snapshot of smart meters in the market, there is increasing interest in viewing trends over time. This is especially relevant as the sector is rapidly approaching the milestone of 10% smart meter penetration. To address this, LDa shared a preview of a new tab which will be added to the public metering dashboard. Notably, this new section, which is currently being finalised, will display a trend view for smart meters,

similar to the visuals found on the 'long unread meters' tab. Accordingly, users will have the opportunity to track the adoption of smart meters from the inception of the market, progressing from an initial uptake of approximately 0.03% to nearly 10%. It is also projected that the 10% threshold will be reached with the forthcoming monthly update, scheduled for 2 and 4 August. In addition, the new dashboard page will enable monthly tracking of the increase, breaking down data by meter type, market composition, wholesaler-retailer pairings, and both absolute numbers and percentages of smart meters. There will also be a ranking by wholesaler and retailer. Finally, the new tab is set to be released to the public metering dashboard on 4 August. AS will be collaborating with the communications team on messaging to mark the achievement of the 10% milestone, which will, in turn, reference this latest dashboard update. SBD asked whether the observed trend was unique to the current view or if the use of a logarithmic scale had influenced the apparent magnitude of the spike, potentially exaggerating it due to an upper limit of ten. SBD also inquired if the data presented to the public is shown as a percentage out of one hundred, thereby accurately reflecting the trajectory rather than implying exponential growth where it does not exist. LDa acknowledged SBD's observations and confirmed that suitable adjustments would be implemented.

5.3. The chair thanked LDa for her presentation.

6. Impact of Smart Meters on Operational terms

6.1. The Committee discussed and conducted a first review of impacted processes within the operational terms from SMART meters. The following points were highlighted:

- CD noted the growing deployment of smart meters and highlighted B5 as an example where smart metering affects bilateral and operational terms. CD stressed the need for a comprehensive review to ensure all impacts are identified, proposing that any required changes be addressed collectively through a single code amendment.
- Furthermore, CD reiterated that the B5 approach would need to be amended to clarify and manage the process for handling communication issues, as well as the roles and responsibilities under various fault conditions. All these elements, CD concluded, required thorough review and revision.

- The review was presented as an individual perspective, with further contributions encouraged. It was noted that smart metering could impact various processes some may only require slight terminology adjustments, while others might need significant revisions based on specific circumstances. As an example, process B5 had already been discussed. An approach was outlined to systematically examine each process, pose questions, and then invite the Committee to identify any potentially missed procedures. For process B2 (data logging, set for December implementation), a question was raised about whether smart metering should be explicitly referenced when requesting a logger for a smart meter. While compatible smart meters do exist, there was uncertainty about whether this point is sufficiently addressed in the current process, leading to a request for colleagues' input on whether it should be specified in B2 or if the documentation already covers this adequately. RR noted that using a flag within CMOS to indicate whether a meter is smart and loggable may be more effective than addressing this only within B2. MT pointed out that requesting and installing a logger are separate actions and that not all smart meters are compatible with loggers. Consequently, some situations require the B7 process, while others can use B2. AB emphasised the importance of clear identification to ensure the correct process is followed for attaching a logger or changing out the meter.

6.2. CD noted that operational procedures could specify that references to meters include smart meters unless otherwise indicated, providing clarification. AB then proposed that if a meter is not loggable, the process should transition automatically to a B7, aiming to simplify procedures for trading parties due to differing requirements among wholesalers. This method would assist retailers by specifying, for example, whether Northumbrian meters are loggable. CD responded that there may be future opportunities for improvement, although the current focus is on a basic process as it is still new. The main issue remains ensuring requestees receive reliable information regarding which meters are loggable. RR commented that various technologies are being tested, intended to make both smart and analogue meters loggable with additional technology. RR raised concerns about overcomplicating the process, suggesting future developments may render such detail unnecessary and that knowing which meters require logging could suffice, leaving wholesalers to fulfil those requirements. RR noted complications, especially when meters are exchanged and configurations change, and recommended observing further progress before making decisions. AR proposed that it may be more effective to flag non-loggable items, rather than specifying loggable ones, and

acknowledged the complexity of introducing a new code for smart meters, expressing uncertainty. AR agreed with RR's suggestion of establishing a distinct process for smart meters as a potentially practical solution. CD clarified that the intention was to update operational terms, not to create a new bilateral system. RR added that data access could be achieved through alternative channels and advised caution when allowing transitions to analogue models, emphasising the goal of comprehensive smart meter adoption. RR noted the diversity of available technologies for data logging from smart meters and advised caution when switching processes, such as moving from B2 to B7 if logging is not possible. The focus remains on widespread smart meter adoption, balancing customer requirements with wholesaler objectives. The objective is to guarantee that devices are appropriately logged or supply the required data, utilising the most effective solutions available. MT agreed, advocating for a straightforward approach: retailers should determine if a meter is loggable. If not, it should progress to the B7 process, with current practice favouring upgrades to smart, loggable devices rather than reverting to analogue models. Clear wording and appropriate management of expectations were noted as important in operational terms. Wholesalers will review requests to determine if the meter is loggable. If it is, they will assess whether logging is possible; if not, they will respond accordingly, and the matter will proceed to B7. MT emphasised the importance of setting clear expectations. SM suggested introducing a logger flag in CMOS, which would trigger specific rules in bilateral processes and potentially prevent the initiation of B7 or B2 under certain conditions. CD acknowledged this was feasible but would require careful evaluation of its implications. SM concurred, highlighting the need for consensus among all parties before implementing such changes.

6.3. CD queried the Committee regarding the possibility of combining the B3 meter accuracy test with disconnection and reconnection activities. The objective was to concentrate particularly on wholesalers with extensive experience in smart metering deployment. CD also sought clarification on whether any procedural differences exist between accuracy testing and disconnection/reconnection processes for smart meters. MT and RR confirmed that the procedures for meter accuracy testing, and disconnection/reconnection are consistent and do not differ for smart meters. CD noted that a review regarding B7 would be conducted to assess whether any necessary adjustments should be implemented. CD also inquired whether, in the case of retrograde, it would be appropriate to permit this, or if the preferred solution would be replacement with an alternative smart meter, potentially one equipped with data logging capabilities. Furthermore, CD referenced an application for a contribution offer

related to the installation of a meter classified as either unmeasured or assessed service component and sought the Committee's views on any potential impact to the H2 process for smart metering. With no objections raised, CD clarified that this process serves primarily as a recommendation and is infrequently applied, being among those procedures established but seldom utilised. CD asked about potential changes to vacancy or gap site processes. LDa suggested that smart meter data could automate vacancy identification, serving as an additional trigger. MT agreed, noting ongoing consideration of consumption at vacant properties and emphasising the need for cooperation with retailers to address issues such as leakage or unreported occupancy. Introducing a process code was considered but MT pointed out existing vacancies processes. The MOSL team will conduct a thorough evaluation to determine the most effective approach, with CD's confirmation that AR will address the issue. RR stated the vacancy incentive payment is unrelated to smart meter installation, and that current processes in collaboration with retailers already verify genuine vacancies. RR recommended focusing on better data use within these systems. CD enquired whether there might be any impact on the accredited entity processes from a smart metering perspective. In response, RR questioned if any other wholesaler currently allows third parties to install their own meters, explaining that the team has never succeeded in this respect. Furthermore, RR elaborated that integrating and pairing these meters with existing systems has proved challenging. Additionally, it was noted that installing analogue meters was far simpler, as third parties could simply install the device and submit the details a process already followed for new developments in certain instances. Recognising this, CD acknowledged the complexity, pointing out that the onboarding and integration steps for smart meters would indeed be more involved, given the necessity to ensure the technology is correctly assimilated into the system. Moreover, CD further remarked that, to their knowledge, only Severn Trent presently permits such installations, and that this area remains relatively new within the industry.

- 6.4. CD queried whether any processes might have been missed and could therefore be affected. MT agreed, noting that recent focus had been on continuous flow and suggesting it might be timely to revisit the good practice guide. MT proposed reviewing the integration of P1 processes into the bilateral hub, to enhance visibility and collaboration with retailers. RR highlighted the need for a feedback mechanism to maintain ongoing communication, observing that continuous flow events can cease abruptly and may occur several times a year. MT added that consideration of the customer journey was important, as affected processes could progress towards section 75. AB remarked it might not solely be the wholesaler-to-

retailer process encompassing one of the F's and suggested starting there before assessing other possible amendments. AB also asked whether wholesaler-to-wholesaler or retailer-to-retailer processes warranted review. CD acknowledged this suggestion.

- 6.5. The Committee considered several points, noting that F6 related to water fittings and notifications also falls under M1, yet is not fully addressed elsewhere. Therefore, the Committee identified F3 as the most appropriate category, though its scope remains broad and its relevance to continuous flow, a high priority, is somewhat unclear. SF suggested that any proposal should be developed further and submitted to the bilaterals programme team for prioritisation, requiring inclusion in a wider code change. CD added that a complete understanding of the data hub's requirements would help reveal any remaining gaps. JD agreed with CD noting that, if the data hub could automatically highlight issues such as continuous flow, it would be crucial to clearly define communication channels between wholesalers and retailers, including which bilaterals to use. This view was echoed by the Committee who stressed the need for retailers to contact customers promptly during supply issues. While managing these processes is challenging, consistency across parties would make them more manageable. Lastly, guidance on the correct process was recommended. However, if the smart metre data hub can notify all parties of specific problems, such as missing continuous flow readings, this requires a different approach than if such notifications are absent where retailers would need to detect issues and wholesalers would need to identify them within their own systems.
- 6.6. The Committee agreed on next steps, inviting members to submit further feedback on any overlooked processes by 12 August. Subsequently, a summary of impacted processes and required changes will be presented, after which additional input will be sought to establish a clear implementation plan. CD explained that the proposed approach is to introduce a single code change addressing all smart metering effects on operational terms, thereby streamlining amendments. SM emphasised that functions must be properly allocated between the smart meter read hub, CMOS, and bilateral systems, ensuring transactions suited to CMOS are not diverted to the hub. In response, CD concurred, noting the hub's role should focus on interaction and communication, with discussions appropriately held within its remit rather than in the smart meter read hub. RR and MT expressed support for using the hub as a venue for necessary discussions. MT noted LDa's recommendation to review the D1 and D2 processes during the implementation of the smart dashboard and raised whether these processes are still required or if the dashboards are sufficient. CD stated that the dashboard is

serving as a proof of concept and commented on the need to reconsider D1 and D2, with further discussion planned. CD also observed that it may be premature to group this change with others since engagement with all wholesalers is still pending. CD indicated that integration could necessitate separate obligations and considered it a distinct change.

6.7. The chair thanked CD for leading this discussion.

7. Meter Read Obligations Workshop

7.1. AR provided the Committee with a high-level overview, comparing how meters are represented in CMOS based on their remote reading capabilities. AR summarised the types of remote reading devices present in CMOS, noting that about 10% are smart AMI meters, 62% are dumb meters, and the remainder includes Touch App readers and Wi-Fi meters. With around 1.27 million meters in total, the analysis of reads from January 2024 to June 2025 showed that 50% of dumb meters recorded three reads over 18 months, matching their typical biannual reading schedule. In contrast, smart AMI meters had a median of 19 reads about one per month with significant variation: some were read quarterly and others as often as 70 to 90 times in the period. This range highlights the diversity of meter types in CMOS and the differing frequencies of meter reading submissions depending on the technology.

7.2. AR emphasised that smart AMI meters represent roughly 10% of those logged in CMOS but account for 31% of all reads, showing their growing influence. Notably, AR pointed out that 780 smart meters have not been read in over a year, which may suggest connection issues, technical faults, tampering, or other barriers to data submission. In addition, approximately 16,000 smart meters have only produced one or two readings over eighteen months well below the market requirement of two reads per year. AR stressed that some of these may be wrongly classified or not properly integrated, and further scrutiny is needed. By contrast, 69,000 smart meters recorded readings more than once per month on average, surpassing the Q2 benchmark, whereas 58,000 fell below this standard. AR clarified that there is no inherent problem with this variation, as data may be gathered but not displayed correctly. However, AR concluded that those meters failing to meet market obligations must be given particular attention. SF asked if the metric needed to be classified as 'smart' for the entire period or only recently, suggesting this might explain some older cases. AR agreed, clarifying the metric likely reflected its most current status, potentially only 'smart' since the start of the year, and committed to further investigation. Consequently, CD pointed out that, while 50% of meters

are read monthly a positive result the regulatory obligation is only twice per year, so the first quartile is compliant. CD also questioned whether all meters had always been classified as 'smart' and whether retailers have sufficient data to submit monthly readings. Therefore, CD suggested these factors could explain why just 50–55% of meters are read monthly, recommending reflection on these points when framing the problem statement. RR calculated that the 16,000 metres with only one or two reads over eighteen months represent about 12% of all smart meters a figure in line with the revised performance expectation of 80–90% connectivity. RR stressed the importance of distinguishing between meters meeting expectations and those that are not, suggesting a closer look at how many of the 16,000 are functioning properly versus those that are not.

ACTION:52_02

- 7.3. JD clarified that, while 12% of smart meters fall below the 80% connectivity target, this proportion is still below the MPF benchmarks of 96% and 98% set for retailers in MO2. Crucially, unless biannual data updates occur, there is no margin for error under the MPF. JD linked this issue to the ongoing debate about when a smart meter should be reclassified as 'dumb' and whether such reclassification is appropriate. JD stressed the importance of determining next steps, warning against penalising retailers for connectivity lapses. Furthermore, JD described the 12% figure as particularly concerning for retailers due to the risk of fines, while AR noted that settlement figures are based on September 2024 data, covering Q1, Q2, and Q3 usage for all meters. The median usage for smart AMI meters was 261, 24% higher than traditional meters at 210 suggesting that smart meters are frequently installed at higher-usage sites or provide more complete data due to more frequent readings. While mean usage for traditional meters (2400) and AMI meters (under 2000) was much higher than the median, this indicates outliers with exceptionally high usage. AR suggested that analysing actual volume advances could clarify the impact of different meter types and reading frequencies. Many smart AMI meters submit to CMOS fewer readings than monthly readings, raising questions about whether this is sufficient for settlement and billing accuracy. AB highlighted the need to pinpoint when meters become "smart" and to automate monthly readings, a process expected to improve with the upcoming smart meter read hub. The committee was reminded that any changes proposed or implemented would take effect after the delivery of the smart meter read hub. It was noted that these changes would impact efficiencies, and that subsequent integration with CMOS would also need to be considered.

7.4. JD highlighted the need for further investigation, particularly regarding the billing and settlement impacts of receiving monthly smart meter reads. JD questioned whether a single monthly reading standard could simplify operations and suggested current standards may have been carried over from traditional meters without adaptation. SF agreed, recommending cautious review before shifting from biannual to monthly obligations, especially as the market is still evolving and performance data from the hub should be assessed first. MT added that reviewing active meter statistics and AR's problem statement would be beneficial and emphasised that any changes should align with MPF reform and be supported by appropriate bilateral processes for missed data. MT also noted the need for clear connectivity guidelines and recommended reviewing performance against MPF and Ofwat thresholds, referencing Anglian Water's 30-day wait for connectivity issues before site visits. It was recommended the Committee review the status against MPF and Ofwat performance thresholds.

ACTION:52_03

7.5. The Committee received an update on internal meters at vacant sites. The presentation began with three slides detailing key statistics as of July 2025. The first slide provided a breakdown by meter type internal versus external and occupied versus vacant. It was noted that vacant sites accounted for approximately 13% of all meters, totalling around 165,000 internal units, with about 49,000 of these internal, representing 3.9%. AR highlighted a significant variation in vacancy rates between internal AMI meters (6.7%) and internal dumb meters (18.5%), suggesting a notable shift. However, AR observed that it was difficult to ascertain whether the higher prevalence of smart meters influenced site occupancy, or whether access challenges at vacant sites resulted in fewer smart meters being installed. In relation to volume analysis, AR referenced settlement averages from September 2024, which indicated that roughly 3.2% of total volume was attributable to vacancies. Questions were raised regarding the duration of vacancies specifically, whether sites were unoccupied throughout the entire period or only for part of it. Additionally, AR noted that external AMI meters recorded volumes similar to external dumb meters (411 versus 423, respectively), while vacant internal AMI meters reported higher volumes (327) than their internal dumb counterparts (257). These trends were consistent with earlier observations and suggested underlying factors affecting usage. A further slide outlined volume levels, revealing that some vacant internal meters displayed extremely high readings in excess of 100,000 litres per day while the majority registered less than 100 litres per day. Committee members queried the influence of smart meters on these

figures, to which AR confirmed that AMI meters at vacant sites were read as frequently as other AMI meters, with median read frequencies remaining at one read per month.

7.6. Further AR advised that a significant portion of internal vacant meters record less than 100 litres of use per day, equating to approximately 3 cubic metres per month. There was discussion regarding whether it is appropriate that market requirements stipulate a minimum of two meter reads per year for such sites, given their low usage, vacant status, and challenging access. Currently, vacant sites represent around 13% of the market. Of these, internal vacant meters account for roughly 49,000, or about 3–4%. Smart (AMI) meters make up 3.3% of internal vacant meters, whilst traditional (“dumb”) meters comprise 63% of internal vacant meters. Vacancy volumes account for about 3% of the market by settlement volume, not meter reads. It was noted that internal AMI meters report higher usage than internal traditional meters. There are approximately 34,000 vacant sites with internal meters recording below 100 litres per day, all still required to be read twice a year. The Committee questioned whether this requirement remains appropriate. It was also suggested that analysis could be extended to include meter advances, not just settlement volumes, and to consider bilateral requests related to internal vacant sites, potentially separating data by meter type, with assistance from the data and operations teams. Additionally, AR noted that certain sites in the market use minimal water, remain vacant, and are equipped with internal meters. AR questioned whether it is necessary to read these meters twice a year, given the associated servicing costs versus the value derived. While previous committee discussions highlighted that issues like leaks may go undetected without regular readings, AR suggested that the installation of smart meters at hard-to-access sites could mitigate these concerns. Furthermore, AR proposed that shifting focus from settlement volume to settlement read-to-read statistics might alter the analysis. AR asked whether there is justification for further investigation in this area and invited suggestions on key questions to guide targeted data analysis.

7.7. The chair thanked AR for leading this workshop.

8. CPW163: Smart AMI definitions

8.1. The Committee received an update on progress in relation to CPW163: Smart AMI definitions. ES introduced CPW163, the smart AMI definition, as a change initiated by MOSL. ES explained that the aim is to revisit and refine the smart AMI definition originally set forth in CPW142,

ensuring it is practical and future-proof for forthcoming projects such as the MPF and the smart meter hub. ES noted that the current code definition remains ambiguous and requires clarification and strengthening ahead of the planned implementation later this year. The primary request to the Committee was to confirm whether members are satisfied with the revised definition and the progress thus far, ensuring it remains consistent with the original objectives of CPW142 and addresses the concerns previously raised in various forums (including CCC, CAG, PAG, and the Metering Committee). It was noted that the plan is to proceed with the definition and two additional requirements, while omitting the third since it is already addressed by the Water Industry Act. ES requested the Committee's confirmation of their support for this approach.

8.2. The Committee discussed the update noting the following points:

- A query was raised about how planned hourly data collection relates to sole traders and GDPR compliance. It was noted that data privacy would be managed through a privacy notice and user agreement, and that the legal team would consult data protection officers prior to implementation. CD added that phase one would cover these requirements, and, in preparation for phase two, relevant details would be incorporated into the code. This process aims to assure wholesalers that sharing data at an hourly level will meet code requirements and protect customer information. MT sought clarification on the timeline, with CD confirming that this was necessary to enable delivery of the smart meter read hub and phase two. SF reminded the Committee that the discussion focused on defining a smart AMI meter, not on specifying which data must be shared with retailers. Discussion of PR24 and connectivity standards highlighted the need for data collection and transmission at an hourly rate. CD noted the current wording specifies data collection "at least hourly" but does not yet require sharing at this stage, emphasising a technical legal distinction.
- Committee members emphasised the importance of establishing clear downstream procedures, particularly regarding the steps to be taken if a smart meter ceases to transmit readings, for example, specifying the timeframe before intervention is necessary. JD observed that retailers would be reluctant to delay action due to the risk of penalties. CD confirmed that these procedural details would be outlined in B5 and discussed by the Committee to determine the exact process.

- The Committee discussed whether smart AMI meters that only partially meet performance standards should be reclassified. SF clarified that reclassification as traditional meters is only for permanently non-functional meters, and that full compliance with MPF standards is not required. Retailers can address ongoing issues through bilaterals. RR emphasised the importance of ensuring that performance commitments, penalties, and meter classification are aligned, in order to prevent unnecessary administrative burdens and to guarantee the accuracy of market metrics.
- The Committee agreed that guidance documents and subsequent bilateral processes should address the management of meters categorised as “in limbo” those not fully operational nor classified as traditional rather than including them in the core definition. JD discussed the possible requirement for a new bilateral process if a smart meter ceases communication with the hub. JD also suggested that wholesalers may initially investigate network issues without penalty, but after a specified service level agreement (SLA) period, responsibility would transition to a site visit. This approach was introduced as a means to clarify the SLA for smart meter reads entering CMOS, while highlighting the relevance of ongoing discussions.

8.3. The Committee agreed with the proposal. The chair thanked ES and AR for the update.

9. CPW162: Skip Codes

9.1. The Committee received an update on progress in relation to CPW162: Skip Codes.

9.2. The Committee was informed that the change seeks to standardise and centralise skip codes within CMOS, thereby replacing the inconsistent and anecdotal reasons currently employed by trading parties for unreadable meters. Furthermore, it was highlighted that the overarching aim is to establish a consistent audit trail and enhance visibility across the market, particularly during customer transfers. In addition, it was explained that CPW162 is regarded as an enabling change, as it sets up the mechanism in CMOS for future standardised skip code lists, which will be managed externally to the code for greater flexibility and ease of updates. ES advised the Committee that the present challenge stems from trading parties utilising their own reasons for skip codes, resulting in inconsistency and a lack of transparency, especially when customers switch suppliers. It was reiterated that the change is enabling in nature, as it establishes the framework in CMOS for standardised skip codes, while the actual list will be maintained outside the code to allow for more straightforward updates. Ultimately, the

intention is to support future efforts by groups such as RWG and PAC to standardise and maintain the skip code list, thereby improving market-wide visibility and the resolution of meter reading issues.

9.3. The Committee discussed the update noting the following points:

- JD emphasised the importance of avoiding an excessively lengthy list of skip codes, such as 70 or more, since this would prove difficult for retailers with extensive meter portfolios to manage. JD suggested that a more concise list, potentially including subcategories to indicate the retailer's next steps, would make the system both more practical and less onerous. Furthermore, JD noted that skip codes in isolation offer limited benefit; it is vital that the system also clarifies the subsequent actions required from the retailer, as not all skips necessitate immediate bilateral intervention.
- MT and JD agreed it was valuable to record skips and their dates to track repeat occurrences. They emphasised that documenting the resolution process whether via retailer engagement, meter reading services, or bilateral action was essential for clarity. MT noted that if a meter is flagged as broken, wholesalers would seek to act, but often retailer involvement precedes wholesale action. Greater visibility of these processes would, in MT's view, enable a more targeted, collaborative approach to resolving issues.
- AR and ES stated that the skip code list will be maintained outside the code, in a non-code document, to facilitate updates without requiring changes to the code itself. This approach is intended to support adaptability as market requirements change.
- BK raised the question of whether smart meters should be exempt from skip code requirements, noting that skips typically pertain to physical site visits. BK also enquired about any obligations concerning the timeliness of submitting skips. JD advised that these matters remain unresolved and warrant further consideration, particularly in the context of how the smart meter data hub might automate or alter the handling of skips. AR noted that both questions had been raised during the previous day's RWG skip code skips subgroup meeting. At present, AR was not entirely certain whether the smart metre required skips and invited further input on this point as well as on the issue of timeliness. AR remarked that, if the roots of resolution were available, this might justify allowing additional time for submission, as this tended to yield more

responses. Therefore, if only a baseline of the skips was provided, the outcome might be different.

- JD identified several key issues that require resolution. JD recommended enhancing the smart meter data hub to automatically detect skips by flagging meters not reporting and subsequently notifying trading parties. This improvement would enable wholesalers to more efficiently determine whether the issue is technical or an actual skip. Currently, JD advises managing skips independently from smart meter data, although the comprehensive approach to skip management is still under review. Furthermore, JD indicated that validating a meter read is relatively straightforward, whereas investigating a skip presents greater complexity due to factors such as skip frequency, consistency of meter readings, and contractor reliability. JD also expressed concerns regarding process timing, specifically whether retailers should be allotted additional time to investigate skips and the impact if a skip report is communicated to the market ten days post-identification. JD emphasized that the overall effectiveness of the system depends on robust implementation and management of skip processes. JD encouraged Committee members to contribute any specific questions or concerns during the consultation, underscoring the importance of addressing these complexities collaboratively.

9.4. The chair thanked ES and AR for the update.

10. AOB incl. Reflections on the Meeting

10.1. The Committee reflected on the meeting.

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

11. Actions from Meeting

Action	Owner	Completion by
ACTION:52_01- JD to provide an update to the metering committee next month on the current status and progress of the group, and to discuss proposed next steps.	JD	August 2025

ACTION:52_02 - Investigate and confirm whether smart meters were smart for the entire period or only part of it.	MOSL	
ACTION:52_03 - It was recommended the Committee review the status against MPF and Ofwat performance thresholds.	MOSL	