

Minutes of the Performance Assurance Committee Meeting 11

29 September 2025 | 09:30 – 16:45

Solent Meeting Room, White Building, Cumberland Place, Southampton, SO15 2NP

Status of the Minutes: Draft

MEMBERS PRESENT

Claire Whyley	CW	Independent Chair	Jesse Wright	JW	Wholesaler Representative
Lindsey Fussell	LF	Independent Member	Andrew Smith	AS	Retailer Representative
Keith Richards	KR	Independent Member	John Spreadbury	JS	Retailer Representative
James Mackenzie	JM	Customer Representative Alternate	Robert Hetherington*	RH	Ofwat Representative
Sam Dawson	SD	Wholesaler Representative	Sarah McMath*	SM	MOSL CEO

**Non-Voting Members of the Committee*

OTHER ATTENDEES

Sam Webb	SW	MOSL Presenter	Nichola Sampford	NS	MOSL Secretariat
Adam Richardson	AR	Panel Secretary			

APOLOGIES

Adam Boyns	AB	Customer Representative	Tanya Sephton	TS	Wholesaler Representative
Ben Kershaw	BK	Retailer Representative			

CLOSED SESSION

1. Welcome and Introductions

- 1.1. The Chair welcomed everyone to the Performance Assurance Committee (“Committee”) meeting and noted that apologies had been received from BK, TS and AB, with JM acting as alternate for AB. It was also highlighted that JM and AS were attending the meeting online.
- 1.2. The Chair reminded Committee members of the requirement to act impartially and not in the interest or as a representative of any organisation or individual. If Committee members believed they had an actual or perceived conflict they should declare this at the start of the meeting or before an agenda item.
- 1.3. It was confirmed that the meeting was quorate.

2. Trading Party 1 Performance Review

- 2.1. The Committee received an update on Trading Party 1’s performance against its Performance Rectification Plan (PRP). The Committee received a paper from Trading Party 1 outlining its plans to improve performance prior to the meeting.
- 2.2. The Committee discussed the update provided, noting that Trading Party 1 remained engaged in the PRP process and progress. The update that was shared with the Committee gave comfort, but there were areas that the Committee would like more information on.
- 2.3. Following the discussion, the Committee:
 - **AGREED** (Unanimously) that a written report from Trading Party 1 would be sufficient for the next meeting (PAC12) in October
 - **AGREED** (Unanimously) that it would like more information on Trading Party 1’s plan to address its underperformance against the metrics agreed in closed session by the Committee.

2.4. The chair thanked SW for the update.

3. Trading Party 2 Performance Review

3.1. The Committee received an update from SW on Trading Party 2's performance. The Committee was disappointed to note that an update had not been received from Trading Party 2. Trading Party 2 had been approached for an update.

3.2. The Committee considered its options and approach to the escalation and its options going forward. Further escalation to the Panel or the Regulator was considered, but it was suggested that in the first instance, there should be a requirement for Trading Party 2 to attend PAC meetings to give a monthly update to the Committee.

3.3. The Committee considered the wider issues around the performance of smaller trading parties, the impact at market level and the impact on end-customers. It was agreed that whilst poor performance for smaller trading parties didn't have the level of risk to the market at large, end-customers were still impacted by poor performance.

3.4. Following discussions, the Committee:

- **AGREED** (Unanimously) that Trading Party 2 representatives should be invited to PAC12 in October to report on the current status of the sale of its book and its plans to mitigate the risk of the negative impact its poor performance is having on its existing end-customers.

3.5. The chair thanked SW for the update.

4. Tabled Updates and Review of Holistic Performance

4.1. The Committee received an update on current status of the Holistic Tables and Letter of Concern recipients.

4.2. The Committee noted that two letters of concern had been sent to very small trading parties and their performance was being managed by SW's team.

4.3. The Committee noted that it would receive an update on trading parties currently in MOSL Focussed Monitoring at PAC12 in October.

4.4. The Committee considered the issues around the way metrics apply to small and large trading parties and the potential issues that can be caused by this. It was noted that its predecessor, the Market Performance Committee (MPC) also looked at this issue and whether smaller trading parties should be considered separately. The Committee agreed that further consideration would be given to this once the new market performance metrics were live.

4.5. The Chair thanked SW for the updates.

OPEN SESSION

MEMBERS PRESENT

Claire Whyley	CW	Independent Chair	Jesse Wright	JW	Wholesaler Representative
Lindsey Fussell	LF	Independent Member	Andrew Smith	AS	Retailer Representative
Keith Richards	KR	Independent Member	John Spreadbury	JS	Retailer Representative
James Mackenzie	JM	Customer Representative Alternate	Robert Hetherington*	RH	Ofwat Representative
Sam Dawson	SD	Wholesaler Representative	Sarah McMath*	SM	MOSL CEO

**Non-Voting Members of the Committee*

OTHER ATTENDEES

Sam Webb	SW	MOSL Presenter	Nichola Sampford	NS	MOSL Secretariat
Adam Richardson	AR	Panel Secretary	Huan Zhang	HZ	MOSL Presenter
Axelle Saada	ASa	MOSL Presenter	Miles Robinson	MR	MOSL Presenter
Angela Day	AD	MOSL Presenter	Evan Joannette	EJ	MOSL Presenter

Reindorf-Elijah Akakpo	REA	MOSL Presenter			
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APOLOGIES

Adam Boyns	AB	Customer Representative	Tanya Sephton	TS	Wholesaler Representative
Ben Kershaw	BK	Retailer Representative			

5. Welcome and Apologies

- 5.1. The Chair welcomed attendees to the open session and noted again that apologies had been received from BK, TS and AB, with JM acting as alternate for AB. It was also highlighted that JM and AS were attending the meeting online.
- 5.2. The Chair reminded Committee members of the requirement to act impartially and not in the interest or as a representative of any organisation or individual. If Committee members believed they had an actual or perceived conflict they should declare this at the start of the meeting or before an agenda item.
- 5.3. It was confirmed that the meeting was quorate.

6. Trading Party Audit

- 6.1. The Committee were asked to review and endorse the Yearly Volume Estimates (YVEs) Statement of Work.
- 6.2. The Committee considered the risks associated with YVEs and the impact that these can have on settlement (between trading parties) and the accuracy of the end-customer's bill. The Committee had a brief explanation of the terms referred to in the Statement of Work around settlement (R1 – month one and RF – final month).
- 6.3. The Committee noted that consumption figures recorded at R1 tend to underestimate use so as part of the audit work, the team will look at the estimated consumption against the next available meter read.

- 6.4. The Settlement parity dashboard charts show that there is an improving picture with consumption estimates. The proportion of meters affected by YVEs has been going down since the first YVE audit was conducted and ASa was hopeful that this would be the last year that a YVE Audit will be carried out. The Committee noted that, across the market, consumption in the final settlement run RF was typically 5.5% higher than in R1.
- 6.5. It was noted that the work around smart metering and removing ineligible premises from the market was contributing to the improvement in settlement parity. The audit data will be cut so it reflects the meter profile (smart vs traditional), internal and external meters, biannual and monthly so that the output of the audit gives more detail.
- 6.6. Following discussion, the Committee:
- **AGREED** (unanimous) to endorse the Yearly Volume Estimates (YVEs) Statement of Work.
- 6.7. The Chair thanked ASa and HZ for their presentation.

7. MO Compliance

- 7.1. The Committee received an update on Market Operator Compliance.
- 7.2. The Committee noted an update on the two non-compliances. The Committee was informed that the non-compliance relating to data retention was being progressed as a code change following the Code Change Committee (CCC) meeting on 13 August 2025 and a sub-group of the CCC met for the first time on 18 September. It is anticipated that the non-compliance relating to CMOS will be resolved in December 2025. The Committee will be updated on this at a future meeting.
- 7.3. The Committee received an interim report from the Market Operator Auditor detailing the plan to move to a standards based approach to audits in the future. This was agreed by the MOSL Board's Audit and Risks Committee in its meeting on 11 September 2025.
- 7.4. The Committee was interested to note its obligations about monitoring Market Operator compliance; it was agreed that NS would find the relevant section within the Market Arrangement Codes and circulate these to the Committee.

ACTION A11_01

7.5. The Chair thanked AD and REA for their presentation.

8. Statement of Approach

- 8.1. The Committee received a brief reminder of the purpose of the Statement of Approach and the Market Performance Review Report, the two governance documents that required its input within the codes. The Committee was shown a view of where the production of these documents sits within the annual cadence of Committee meetings as well as an illustration of the link between these documents and the MOSL Risks and Issues Tracker.
- 8.2. The Committee noted that the Statement of Approach detailed areas of focus, particularly with regards to trading party audits and it could signal new or proposed performance indicators to stakeholders.
- 8.3. It was further noted that the timing helps with Business Planning for the MOSL Board to ensure that enough resource is in place to carry out the areas of focus detailed in the Statement of Approach.
- 8.4. The Committee agreed that it would like a paragraph in the Statement of Approach that flags its input. It was suggested that this should include something that speaks to the Committee taking an overall view of performance that seeks the best outcomes for the end-customer. The Committee would also like to see a line that details its desire to support improvements in performance outside of the formal escalation process, with reference to flexibility in dealing with potential escalations. It was also suggested that the Committee's work in monitoring performance through the audits should be included in this additional paragraph. It was agreed that SW/NS would draft an additional paragraph to add to the Statement of Approach.

ACTION A11_02

8.5. The Chair thanked SW and NS for the update.

9. Peer Comparison & Ranking of Trading Parties

- 9.1. The Committee discussed and were asked to make a decision on how to rank Trading Parties.
- 9.2. The Committee acknowledged the various ways in which Trading Parties could be ranked, using different calculation weighting. It was noted that the more complicated the calculation, the more difficult it would be to explain and, keeping the ranking calculation straightforward

(using the average of the total of all ranked metrics) offered a degree of simplicity to the process of ranking.

- 9.3. It was agreed for now that PAC would receive the tables labelled green for those trading parties above the minimum standard and red for those below (for metrics with “absolute” standards attached to them). In the public view on the website these would remain in shades of blue.
- 9.4. It was agreed by the Committee that consistency in approach was vital. It was agreed that, as new metrics were added to the ranking, there should be regular check-ins to ensure that this methodology for ranking remained the best approach.
- 9.5. The Committee noted that the main focus of this work is to surface this information to the market and that, in the future, the Committee may wish to discuss how this is surfaced in a different way with issues such as regional differences and how they impact performance against the metrics taken into consideration. For now, the peer comparison table will help trading parties see how they are performing against their peers and how the Committee comes to its decisions.
- 9.6. The Committee noted that there will be communications with the market about peer comparison tables and the proposed changes for both Wholesalers and Retailers.
- 9.7. Following discussion, the Committee:
 - **AGREED** (Unanimously) with the approach suggested by SW to rank trading parties, subject to the necessary communication with the market.
- 9.8. The Chair thanked SW for her presentation.

10. MPF Reform – what is in scope going forwards?

- 10.1. The Committee received an update on the additional metrics identified by the MPF Reform Programme. A comprehensive slide pack was issued to the Committee prior to the meeting.
- 10.2. The Committee noted that the Code Change Committee recommended to Ofwat that the MPF Reform change [CPM058 & CPW149 \(c\) \(Cyclical and Transfer Reads KPIs\)](#) be approved at its meeting in August. Ofwat was undertaking a statutory consultation on this change and the Ofwat consultation closing date was 7 October 2025. The KPIs detailed in this code change will

have charges attached to them; Additional Metrics will not and do not require a code change to implement.

10.3. The presentation detailed the Additional Metrics, including those that reported on in some format already (M10, M38 and M39). It was noted that reporting on M11 will take place in the form of an annual data audit. Metrics currently on hold are M16 and M17 which relate to deferrals¹.

10.4. The presentation also detailed Market Indicators that will help to give PAC some context when making decisions and looking at general trends in market performance.

11. MPF Reform – Delivery Plan

11.1. The Committee received a detailed delivery plan from the Programme Leads.

11.2. It was agreed that the Committee would receive a more detailed update on the new metrics that are to be delivered between now and April at its meeting in October and then, in November (and December) more detailed plans on the delivery of the new metrics would be articulated.

11.3. The process through which potential changes to the metrics was shared with the Committee along with details of how performance monitoring at a market-wide level down to the performance of individual trading parties was illustrated.

11.4. The various interventions (support, holding parties to account, changing market systems or codes and using influence with outside bodies) along with a proposed cadence for future meetings was shared with the Committee.

¹ M10: Number of Long Unread Meters with outstanding B5 or C1 bilateral tasks; M38: Proportion of Legacy Long Unread Meters; M39: Proportion of all meters read with 12 months; M11: Proportion of complete and accurate customer/banner names and SIC code; M16: Proportion of non-deferred ORIDs; M17: Average length of deferrals per ORIDs

12. MPF Reform – Initial Vision for PAC “Business As Usual”

- 12.1. The Committee considered the proposed vision for BAU.
- 12.2. The Committee could decide to publish data relating to the new metrics, but it was agreed that having a line where it details “typically we publish X and do not publish Y” would be preferable for the sake of consistency.
- 12.3. The Committee noted that, once a reference sheet for the new metrics had been produced, it would be useful to indicate whether the metrics apply to wholesalers or retailers.
- 12.4. The Committee noted the cycle of meetings detailed in the presentation of the delivery plan and agreed that targeted meetings would be useful. It was agreed that having as much flexibility as possible was preferable. The Committee noted that consistency for the benefit of the market was important, but this had to be balanced with having a committee that was responsive in monitoring performance.
- 12.5. The Chair thanked EJ and MR for their presentation.

13. Tabled Updates

- 13.1. The Committee noted the Tabled Updates paper detailing the work of Panel and its committees.
- 13.2. The Committee approved the minutes for PAC09 and PAC09a (July 2025) as an accurate record of the meetings.
- 13.3. The Committee agreed to close actions A09_01 and A09_02. In terms of the recruitment of alternates for PAC, it was noted that NS will be working with the Secretariat team to promote the positions of Alternates to the market.
- 13.4. It was suggested that, for A09_03, there could be a solution linked to the proposals for appointing a Supplier of Last Resort. This will be considered and brought to a future PAC meeting in early 2026. The Committee agreed to postpone any further action on A05_04 (proposed development of a metric to look at vacant with consumption sites) until the new performance metrics had been explained and established as it could be that this is covered satisfactorily by one of these metrics).

14. AOB incl. Reflections on the Meeting

- 14.1. The Committee considered the AOB item raised by a PAC member relating to the proposed Guaranteed Service Scheme (GSS) payments. These compensation payments to customers, introduced by secondary legislation changes effective from October 2025, related to failure to read customer meters. The Committee noted that some Trading Parties had expressed concerns that Retailers would be subject to both GSS payments relating to meter reading and MPF charges (in particular, key performance indicator M01 – cyclic meter reading) and that this raised the potential for 'double jeopardy'.
- 14.2. The PAC member noted that the MPF reform expressly sought to avoid duplicate or overlapping metrics and charges, i.e. 'double jeopardy', and asked the Committee for its view on whether dual charges could occur.
- 14.3. Some members felt that elements of 'double jeopardy' may exist, others indicated that they felt that GSS payments and MPF charges were different things.
- 14.4. The PAC member noted there was value in the PAC retaining visibility of meter reading performance and suggested that one option could be to make M01 an Additional Metric under the new framework.
- 14.5. The Committee noted the discussion and agreed that it was not for the Committee to determine a way forward at this point while Ofwat was still to consider the MPF Reform change [CPM058 & CPW149 \(c\) \(Cyclical and Transfer Reads KPIs\)](#). Further consideration may be required once Ofwat has provided clarity on the final MPF reform package and this topic would be added to the agenda for PAC13 in November when Ofwat would be in a position to provide more information to the Committee.

ACTION A11_03

- 14.6. The Committee reflected on the meeting.
- 14.7. There being no further business, the Chair closed the meeting.