

Minutes of Panel Meeting 33

23th July 2019 | 10:30 – 14:30

MOSL, The White Building, 1-4 Cumberland Place, SO15 2NP

Status of the Minutes: Approved

THE PANEL

Jim Keohane	JK	Chair	Mark Holloway	МН	Panel Member (Wholesaler)
Mike Brindle	MBr	Panel Member (Associated Retailer)	Helyn Mensah (T-Con)	НМ	Panel Member (Independent)
Christopher Williams (T-Con.)	CW	Panel Member (Associated Retailer)	John Vinson	JV	Alternate Panel Member for Nigel Sisman (Independent)
Trevor Nelson	TN	Panel Member (Unassociated Retailer)	Christina Blackwell	СВ	Affiliated Panel Member (CCWater)
Nicola Smith	NSm	Panel Member (Unassociated Retailer)	Dan Mason	DM	Affiliated Panel Member (Ofwat)
Claire Yeates	СУ	Panel Member (Unassociated Retailer)	Georgina Mills	GM	Affiliated Panel Member (Ofwat)
lan Dearnley	ID	Panel Member (Wholesaler)	Adam Richardson	AR	Panel Secretary
Martin Mavin	MM	Panel Member (Wholesaler)			

OTHER ATTENDEES

Huw Comerford	НС	Presenter (MOSL)	George Monea	GMo	Secretariat (MOSL)
Oliver Farrell	OF	Presenter (MOSL)	Antoine Schmidt	AS	Observer (Thames)
Abu Rashid	ARa	Presenter (MOSL)			

APOLOGIES

Stuart Boyle	SB	Secretariat (MOSL)	Nigel Sisman	NS	Panel Member (Independent)
Sarah McMath	SM	Affiliated Panel Member (MOSL CEO)	Elsa Wye	EW	Panel Member (Independent)

Welcome and Introductions

- 1.1. The Chair welcomed everyone attending the Panel Meeting.
- 1.2. Sarah McMath, Stuart Boyle, Elsa Wye and Nigel Sisman were apologies for the Panel 33 meeting. It was explained that John Vinson (JV) will act as an alternate Panel Member for Nigel Sisman.

2. Minutes and Outstanding Actions

- 2.1. The Panel agreed the P32 minutes with no further amendments.
- 2.2. AR presented the Closed Actions and the remaining Outstanding Actions. The Panel agreed with the outstanding actions and to close actions: A32_04, A32_06, A32_07, A32_08, A32_09, A32_11
- 2.3. A Panel Member enquired if an additional call for an Associated Retailer Panel member had been sent out. AR explained that an invitation for nominations had been issued, however, no nominations had been received so far from Trading Parties.
- 2.4. DM explained that Ofwat will be keen to assist with any form of communication due to be sent out to Chief Executives of Associated Retailers in order to encourage nominations. The Chair suggested that he circulate a letter to Chief Executives of Associated Retailers to further encourage nominations.

ACTION A33_01

3. Update from Ofwat

- 3.1. DM provided an update from Ofwat. It was explained that decisions on the Credit related Changes discussed at the May Panel meeting (CPW057, CPW060 and CPW061) are anticipated to be published during August.
- 3.2. DM advised that the approval of CPM014 (MPS Charges Re-distribution Clarification) had been published. He also noted that an investigation into Thames Water into whether it is contravening the Competition Act 1998 had been opened. Panel Members were informed that more information regarding the complaint can be found on Ofwat's <u>website</u>.
- 3.3. Georgina Mills (GM) presented an overview of Ofwat's <u>State of the Market report</u> for year two and explained that not a lot has changed when compared to year one. GM explained that smaller businesses customers are still less likely to engage or benefit from the business retail market compared to larger entities and that the joint Ofwat and CCWater qualitative research showed that smaller business customers just perceived the costs of engaging in the market rather than benefiting from it.
- 3.4. Ofwat conservatively estimated that customers switching/re-negotiating have collected savings of around £10 million in the second year of the market. This was compared to a saving of £8 million in the first year.

- 3.5. It was explained that, compared to year one, the number of customers who switched/re-negotiated is higher, however, the savings achieved are smaller.
- 3.6. Water efficiency has been slow to emerge, and self-supply continues to be an attractive option. She noted that some of the companies using self-supply are displaying impressive water savings. GM explained that there are 3 companies saving 150 mega litres of water between them.
- 3.7. The market frictions (poor quality data, Retailer/Wholesaler interactions and Wholesaler performance) are still persistent and, in Ofwat's view, little progress had been made since market opening. Ofwat was asking the industry to address these issues in year 3 as a matter of priority.
- 3.8. GM explained that the decision on the price/non-price protection which will apply to customers on deemed contracts from April 2020 has been published. The decision reflects the consultation proposals with the customers on deemed contracts who use less than 0.5MI per year retaining price protection at a similar level to the current protections. Furthermore, it was explained that customers with higher usage, who are more likely to engage in and benefit from the market will have a retained but relaxed price protection.
- 3.9. It was mentioned that the market is still evolving, and the frictions need to be addressed in order to change customers incentives and encourage them to engage in the market. GM explained that Ofwat intends to review the price protections document in 2-3 years' time to reflect on any changes that happen in the market and make any amendments.
- 3.10. Furthermore, it was explained that in the decision documents there will be a 'no worse off' clause which will apply from April 2020 to provide further benefits to customers.
- 3.11. A Panel Member enquired if a change has already been made, would customers have to be reversed back to what system they were on before April 2020 or if the 'no worse off' clause affects only changes implemented after April 2020.
- 3.12. GM explained that if a change has been made before April 2020, Trading Parties will need to demonstrate that customers are 'no worse off' than before April 2020 and if they are, Trading Parties would need to implement a change to help the customer.
- 3.13. To answer how Ofwat will judge if a customer is 'worse off', GM explained that Retailers need to judge this themselves and need to be able to demonstrate that customers are no worse off (e.g. by consulting with the customer).

4. CC Water Update

- 4.1. CB presented the complaints report published by <u>CC Water</u> which covered NHH customer complaints received by and about Retailers to CCWater.
- 4.2. A Panel Member enquired if any of the root cause analysis of the Retailer complaints have resulted in a change of complaint ownership to Wholesalers. CB explained that some complaints might have had a wholesaler aspect, but it did not completely change the ownership of the complaint.

- 4.3. CB explained that inaccuracies in customers billing are driving forward the majority of complaints. The Chair added that a number of the complaints could be correlated with the market frictions presented in the Ofwat update.
- 4.4. Several Panel members requested to have circulated a breakdown of the billing and charges complaints category.

ACTION A33_02

- 4.5. CB presented a few slides from the joint business customer insight research completed with Ofwat.
- 4.6. A Panel Member explained that the report includes some positive messages, however, the Panel Member asked if it would be possible to have a comparison with other utilities (e.g. electricity/gas) to understand the percentages better.
- 4.7. GM also added that the research results showed that customers were happy/satisfied based on not having a reason to contact the retailer.

5. Questions on MOSL Update

- 5.1. A Panel Member enquired about one of the MPOP targets which is to reduce to zero percent the number of meters which have not been read since the market opening. Furthermore, the Panel Member enquired if this would be possible to be completed by the end of the year.
- 5.2. AR explained that MOSL needs to take a view in conjunction with MPC about what needs to be done and what will happen if a situation arises in which a Trading Party is continuously tracking behind the required rate of improvement.
- 5.3. A Panel Member enquired if zero % is a realistic target. Another Panel Member explained that this is a big challenge, however it should be something to aim for. The Panel Member explained that the only concern is that there is a large proportion of meters which retailers struggle to get to and are unable to get any meter reads.
- 5.4. The Chair also added that in time, the optimal percentage of meter reads will be determined.
- 5.5. A Panel Member requested a copy of the Vacancy Study Report which aims to begin the stream of work which will determine the true level of vacancy in the market.

ACTION A33_03

5.6. Panel Members enquired if it would be possible to have an update from Sarah McMath to share her reflections following her ongoing visits to Trading Parties.

ACTION A33_04

6. Committee Reports

- 6.1. A Panel Member enquired when the Economic Insights (EI) report regarding the redistribution of Market Performance Standard (MPS) Charges will be circulated wider, as it was explained that in order for the Panel to make a decision it is important to get a full view of the incoming Change Proposal.
- 6.2. Another Panel Member advised a couple of concerns had been raised by Trading Parties as the EI report contains data which may be commercially sensitive. They noted that the Market Performance Committee (MPC) was working with these Trading Parties to resolve these concerns.
- 6.3. A Panel Member explained that publishing data contained in the EI report could lead to a Trading Party being able to determine the exact revenue of another Trading Party, hence why this represents a concern.
- 6.4. AR noted that, subject to the MPC being content that the report should be circulated, it could be shared with Panel Members on a confidential basis. The Panel noted that the EI report would ultimately form part of the evidence pack that underpinned any recommendation from the MPC regarding the prospective change relating to redistribution of MPS charges. As such, the noted concerns would need to be resolved prior to this report being made available publicly with the associated change documentation.
- 6.5. AR explained that there is nothing to report on TDC and on Trade Effluent as everything is progressing as expected.
- 6.6. Helyn Mensah (HM) explained that a full update from the GDPR Committee will be given at the August Panel Update.

7. Market Performance Committee Terms of Reference

- 7.1. The Panel considered amendments to the MPC Terms of Reference to allow for additional flexibility in setting MPC members terms of office.
- 7.2. A Panel Member enquired if the Panel membership changing at the same time as the MPC would create any risk to continuity arising from too many simultaneous membership changes. AR explained that work should be done to plan how to handle the transition in advance of 2021 elections.
- 7.3. The Panel voted unanimously to recommend the proposed change.

The Panel:

• AGREED to the update the Market Performance Committee Terms of Reference.

ACTION A33_05

8. Questions on Change Report

8.1. The Panel noted new Change Proposal CPW069 – Right of retailers to appoint an accredited entity. The Panel agreed that this change should not be remitted to a sub-group and that MOSL should work with the proposer to assess the change. The Panel noted that the proposed consultation period fell in

August and agreed that, if insufficient responses were received over this holiday period, MOSL should extend the consultation. The Panel agreed that it would consider the recommendation report in October.

- 8.2. HC explained that MOSL was requesting an extension on CPM015 (Panel Self-Governance) from August to September due to concerns about the compatibility with the Water Act. HC further explained that there was an ongoing dialogue with Ofwat about this technical concern. The Panel noted that the change will be put through consultation shortly, however, this meant that the deadline to report in August could not be met.
- 8.3. The Panel approved the extension request.
- 8.4. AR noted the ongoing work on MPS redistribution being conducted by the MPC. He confirmed that Ofwat had provided a short extension to its deadline for the Panel to make a recommendation regarding this matter. This meant that the Panel would now be required to make a recommendation to Ofwat by October, rather than September. AR further explained that, despite this extension, a clear Change Proposal for the MPS work on re-distribution was required urgently to enable work to commence on legal drafting and assessment of other impacts to be considered ahead of any consultation with industry.
- 8.5. A Panel Member queried if CPW066 (Estimation Review) had been issued for consultation, noting that the Change Report indicated it had yet to be issued. AR confirmed that a Request for Information (RFI) had been sent out and that this two-week process would close on 29th July. He noted that MOSL would consider any amendments to the original proposal based on this feedback.

9. Draft Recommendation Report: CPM016: Panel Voting Majorities

- 9.1. The Panel considered the Draft Recommendation Report for CPM016 which sought to alter the Panel voting mechanism to a Simple Majority plus one vote.
- 9.2. It was explained that the Sub-group decided not to consult on CPM016 due to this change not having an impact on Trading Party systems and processes; having a minimal impact on Market Operator costs and due to the change relating to internal Panel governance. With this in mind, the Sub-group felt the Panel should take the lead in improving its own operations and efficiencies.
- 9.3. Some Panel Members felt that the change did not go far enough, and a simple majority would have been more appropriate, however, the Panel Members noted that on balance the change presented was better than the current rules and agreed with the sub-group's rationale and view against the code objectives and principles as set in the paper.
- 9.4. The Panel noted that this change did not impact Trading Party systems or processes and requested that the change be implemented as soon as possible, rather than be tied to a scheduled code or systems release.
- 9.5. The Panel agreed with the proposer's views that the changes in CPM016 further the principles of Efficiency. The Panel voted unanimously to recommend the proposed change.

- AGREED to recommend implementation of CPM016 to the Authority for approval; and
- AGREED the recommended implementation date of 20 working days after Authority approval is received.

10. Draft Recommendation Report: CPM006: Introducing a Process for Urgent Change Proposals

- 10.1. The Panel considered the Draft Recommendation Report for CPM006 which sought to introduce a process for managing Change Proposals that have been marked as urgent.
- 10.2. DM mentioned that in the legal drafting there needs to be a caveat in section 5.9.1 in the Market Arrangements Codes (MAC) to reflect the new section 5.8.4 due to be added because of CPM006. Furthermore, a Panel Member explained that the legal drafting criteria also needs to reflect the Market Arrangements Code and Charging Change Proposal and class them as urgent Change Proposals.

ACTION A33_06

- 10.3. The Panel noted that currently there is no criteria defining when a change proposal could be classed as an urgent change HC explained that by adding the criteria of what an urgent change proposal is formed of, the Panel and Trading Parties could better assess whether a change was truly urgent. The proposed amendments would ensure that such an urgent change could be considered in short order even in the rare event that a Panel quorum could not be achieved. The Panel noted that this did not prevent it prioritising or expediting changes that should be progressed quickly but were not classed as 'urgent' under the standard processes in the course of its normal business.
- 10.4. The Panel agreed with the proposer's views that the changes in CPM006 furthers the principles of Efficiency and Transparency.
- 10.5. The Panel voted unanimously to recommend the proposed change.

The Panel:

- AGREED to recommend implementation of CPM006 to the Authority for approval; and
- AGREED the recommended implementation date of:
 - 30 September 2019, if Authority approval is received by 5 September 2019;
 - o 8 November 2019, if Authority **approval** is received by 16 October 2019.

11. Draft Recommendation Report: CPM013: Adding the Customer Representative as a Panel Member

- 11.1. The Panel considered the Draft Recommendation Report for CPM013 which sought to alter the composition of the Panel to include a Customer Representative Panel Member.
- 11.2. HC highlighted a small number of late changes to the solution which had been proposed by the Sub-Group following a late observation from Ofwat regarding the appointment process of the Customer Representative Panel Member. The updated solution was for CC Water to nominate a Qualified person which will be appointed to the Panel by the Panel Chairman, rather than being appointed by Ofwat.
- 11.3. The Panel noted that the Sub-Group recommendation to approve the change was not unanimous and raised concerns about the proposal overall. A Panel Member explained that they did not believe the change would bring additional benefits as CCWater was already present and able to contribute at Panel meetings. In their view, the customer was already represented and had a voice and as long as the minutes accurately reflect the Customer Representative's views on the change, other Panel Member would be aware of it. The Panel Member felt that as customer champion, CC Water can raise points about customer point of views.
- 11.4. The Panel Member also noted a concern that adding a new Panel Member would dilute the number of voting members drawn from the industry. They felt that the Market existed for the benefit of the customers, therefore every Panel member needs to be aware of the customer needs.
- 11.5. One Panel Member believed this change was a significant re-adjustment in the composition of the industry Panel and that the Sub-group should have sent the change to consultation to understand the industry's views on the matter.
- 11.6. A Panel Member enquired about CC Water being permitted to abstain from voting on matters not relating to customer benefit and further explained that Panel members should not represent just one group and make contributions to the Panel regardless of their representation.
- 11.7. AR explained that abstentions are the same for all Panel members and any member can abstain from voting should they wish too. The market codes do not, and should not, limit the ability for Panel Members to abstain. The Panel agreed with this view and noted that all Panel Members should be encouraged to use their votes.
- 11.8. Another Panel Member felt that this change ultimately represented a positive step forward and added weight to the customer view and on what needs to be done to create a better market for the customer.
- 11.9. The Panel noted that part of the remit of the Panel is to work for the market and the benefit of the customer and that Panel Members need to be seen doing so. A Panel Member noted that the Governance group had considered this issue carefully.
- 11.10. Another Panel Member felt that there was no evidence presented that demonstrated the Customer Representative has not had a voice on voting matters.

- 11.11.GM observed that as part of evidence gathering for the state of the market report, Ofwat had noted there was a perception that the customer voice was not strong in decision making within the market.
- 11.12. The majority of Panel Members agreed with the proposer's views that the changes in CPM013 furthered the principles of Transparency and Customer Participation. However, two Panel Members felt the change was no better than the current baseline and disagreed that CPM013 furthered the principles of Transparency and Customer Participation.
- 11.13. The Panel voted on this Change Proposal and there were **7 votes in favor**, **1 abstention** and **2 against**¹.

- AGREED to recommend CPM013 to the Authority for rejection; and
- AGREED that if CPM013 is approved, the recommended implementation date is:
 - o 30 September 2019, if Authority approval is received by 23 September 2019;
 - o 8 November 2019, if Authority **approval** is received by 23 October 2019.
- 11.14. A Panel Member suggested to add an agenda item for a Strategy Day to discuss how to improve Customer Representation in Panel decisions.

ACTION A33_07

12. Draft Recommendation Report: CPW059: Changes to Review Obligations

- 12.1. The Panel considered the Draft Recommendation Report for CPW059 which sought to remove 'Provisions of Information' section (1.2.11) from the Market Terms and amend the timescales for the following 4 technical reviews to a 'time to time' approach:
 - Rollover Detection Algorithm (CSD 0203)
 - Nominal Maximum Design Capacity table (CSD 0203)
 - Industry Level Estimates (CSD 0207)
 - Volume Estimating Caps (CSD 0207)
- 12.2. ARa explained that 2 actions were raised by the Panel in regard to CPW059.
 - Review the timescales in the CSD.
 - Remove the provisions of information.

¹ The current bar for Panel to pass decisions is by a Qualifying Majority of 10 votes in favour or unanimous decision.

- 12.3. A Panel Member enquired if there should be any contextual examples (e.g. if a certain event occurs then a review is triggered).
- 12.4. A Panel Member suggested to move towards a more risk-based approach and that the Panel should confirm its key risk indicators which may cause it to trigger a review.

ACTIONA33_08

- 12.5. The Panel agreed with the proposer's views that the change in CPW059 furthered the principles of efficiency, transparency, simplicity, cost-effectiveness and security.
- 12.6. The Panel voted unanimously to recommend the proposed change for approval.

The Panel:

- AGREED to recommend implementation of CPW059 to the Authority for approval; and
- AGREED the recommended implementation date of:
 - 8 November 2019, if Authority approval is received by 16 October 2019;
 - o 14 February 2020, if Authority **approval** is received by 22 January 2020.

13. Draft Recommendation Report: CPW062: Household Indicator Flag

- 13.1. The Panel considered the Draft Recommendation Report for CPW062 which sought to introduce a change in the market codes to aid in identifying NHH sites that also supply water services to household premises.
- 13.2. A Panel Member explained that it could see the benefits of this change, however the Panel Member was concerned about the Trading Party costs of implementing the change.
- 13.3. Lynnette Cross (LC) explained that Welsh Water have data which shows households being supplied for 13,500 sites (10% representing domestic supply points). LC further explained that there is currently no place in the system to put this information.
- 13.4. A Panel Member felt that it was an absolutely good thing to highlight where there was the risk that domestic customers may be affected if a business site was disconnected, however the only question was about the scale and cost versus the benefit of this change.
- 13.5. CB explained that from CC Water's point of view, at face value, if Wholesalers were holding information about customer premises in the market it would be strange that the information was not shared and could eventually be lost.
- 13.6. The Panel noted that it is optional and not mandatory for Trading Parties to update the information.
- 13.7. A Panel Member mentioned that if it was not mandatory to fill in the data and keep it up to date, there would be little benefit in making this change.
- 13.8. The Panel considered whether a further consultation should be undertaken. It was noted that MOSL had already conducted further engagement with respondents to the original consultation in an effort

- to obtain further data on impacts. Some Panel Members noted that, deferring a decision now would result in the change missing the proposed implementation date of May 2020. Given the engagement to date on this change, they felt that the Panel should make a determination based on the information in front of it.
- 13.9. Majority of Panel Members agreed with the proposal for CPW062 but raised concerns regarding the scale, costs and associated benefits. Furthermore, the Panel noted that the introduction of this data item as mandatory data item may result in making this change more expensive and delay the implementation date. Furthermore, Trading Parties may not utilise this data item and this would limit the benefit that the change would provide.
- 13.10. The Panel voted on this Change Proposal and there were 9 votes in favour and 1 against²

- AGREED to recommend CPW062 to the Authority for rejection; and
- AGREED that if CPW062 was approved, the recommended implementation date of:
 - 15 May 2020, if Authority approval is received by 30 September 2019;
 - o 13 November 2020, if Authority approval is received by 30 April 2020.

14. Change Proposal: CPW070: Provisions for the Development of a Consistent Bilateral Interfaces Solution

- 14.1. The Panel considered the Authority Timetabled Change Proposal for CPW070 which sought to enable standardisation in bilateral interactions supported by a technology platform.
- 14.2. AR explained that there were 2 things which the Panel needed to consider for the new change, appointments to the Project Steering Group and the establishment of a Panel Sub-Group.
- 14.3. The Project structure outlined the Project Steering Group. Three seats on the Steering Group need to be nominated by the Panel (one Wholesaler, one Retailer and one Independent). AR explained that the Steering Group members could be Panel Members but did not have to be. The Panel noted that when the Panel's Governance Sub-group considered this, there was an observation that it may be preferable from a perspective of skills and resourcing that the appointments should not be drawn from Panel Members.
- 14.4. AR explained that the Project Structure outlined a range of advisory groups which were part of the processes outlined by Ofwat. AR explained that the key group for the Panel is the Market Codes Rule Group which will be responsible for putting together the code drafting. AR suggested that the Market Codes Rule Group should be set up as a Panel Sub-Group and should be formed from 3 Wholesalers and 3 Retailers
- 14.5. AR suggested that if the Panel is happy with the 3 Wholesalers/3 Retailers composition, then it should follow the normal nominations process to appoint the members. The Panel agreed that the sub-group

² The current bar for Panel to pass decisions is by a Qualifying Majority of 10 votes in favour or unanimous decision.

- should be formed from 3 wholesalers and 3 retailers. Furthermore, the Panel agreed that MOSL should commence the nomination process for the sub-group to support the project timetable.
- 14.6. The Panel noted that MH, HM and CW volunteered to work with MOSL on identifying the method for seeking nominations of candidates for the Steering Group.

- NOTED the Ofwat directed approach and timetable for developing CPW070; and
- CONFIRMED the approach for considering and nominating defined members of the Steering group; and
- AGREED to establish a Sub-Group to consider the code drafting as part of this change.

15. Draft Recomendation Report: CPW064: Changes to Corrective Settlement Run for Individual Supply Points

- 15.1. The Panel considered the Draft Recommendation Report for CPW064. This change sought to amend the current requirements in the market codes for requesting corrective settlement runs for a selection of Supply Points (SPIDs), based on any specific invoice period. If approved, this change would ensure that Trading Parties are able to either request settlement re-running on full wholesale-retails pairings or individual SPIDs.
- 15.2. The Panel noted that the change is enhancing the existing process for Trading Parties by increasing its flexibility at no further costs.
- 15.3. The Panel agreed that the proposed changes in CPW064 would further the following market principles of Efficiency, Proportionality, Simplicity, Cost-Effectiveness and Security.
- 15.4. The Panel voted unanimously to recommend the change proposal for approval.

The Panel:

- AGREED to recommend CPW064 to the Authority for approval; and
- AGREED the recommended implementation date of:
 - o 8 November 2019, if Authority approval is received by 1 October 2019;
 - o 14 February 2020, if Authority approval is received by 29 November 2019.

16. AOB

- 16.1. A Panel Member noted that it was important to keep reviewing and improving the effectiveness of the Panel.
- 16.2. AR noted that the forthcoming strategy workshop would be held on the 1st August and would build on the work at the last two workshops.
- 16.3. A Panel Member queried whether there were additional consequential changes to the codes that may be needed to ensure that new connections activities worked smoothly following the removal of much of section A from the <u>Operations Terms</u> because of CPW058 (Removing Processes A1-A5 (Developer Services). The Panel noted that prioritising this would need to be considered in light of the outputs from the forthcoming strategy workshop and plan.

Actions:

- A33_01 Create a letter on the behalf of the Chair of the Panel and send it to Chief Executives of Trading Parties to prompt nominations for Associated Retailer Panel Member.
- A33_02 Circulate a full breakdown from CC Water report to Panel members.
- A33_03 Circulate a copy of the Vacancy Study Report and the findings of the report to Panel Members.
- A33_04 Provide an update following the completion of TP visits
- A33 05 Upload new MPC ToR to the MOSL website
- A33_06 Amend Legal Drafting for CPM006 (amend 5.9.1 to reflect point 5.8.4/ Amend criteria to reflect Market Arrangements Code and Charging Change Proposal)
- A33_07 Add an agenda item for Strategy Day to discuss how to improve customer representation in panel decisions.
- A33_08 Document key risk indicators for CPW059 and report on these periodically (and at least every 3 years).

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