

# Minutes of the Metering Committee Meeting 27

13 June 2023 | 09:30 – 14:00 | Via MS Teams

Status of Minutes: **APPROVED**

## MEMBERS PRESENT

Steve Formoy	SF	Chair*	Christina Blackwell	CB	Customer Representative Member
Angela Brown	AB	Wholesaler Member	Richard Barton	RB	Retailer Member
Kevin McCalliskey	KM	Wholesaler Member	Claire Stanness	CS	Retailer Member
Rosie Rand	RR	Wholesaler Member	Paul Heron	PH	Retailer Member
Michelle Thompson	MT	Wholesaler Member	Mark Doherty	MD	Retailer Member
John Davies	JD	MOSL Representative*			

*\*Non-Voting Members of the Committee*

## OTHER ATTENDEES

Martin Hall	MH	MOSL Presenter	Alex Cowie	AC	MOSL Secretariat
Simon Bennett	SPB	MOSL Presenter	Huw Comerford	HC	MOSL Presenter
Adrian Smith	AS	MOSL Presenter	Florentina Monea	FM	MOSL Presenter
Chris Dawson	CD	MOSL Observer	Luke Coyle	LC	MOSL Observer
Amanda Hinde	AH	MOSL Presenter			

## APOLOGIES

Mitchell Yeoman-Boldry	MYB	Wholesaler Member			
------------------------	-----	-------------------	--	--	--

## 1. Welcome and Apologies

- 1.1. The Chair welcomed everyone to the Metering Committee (“Committee”) meeting and noted that apologies had been received from MYB. It was also noted that MT would join the meeting slightly late and that several members would need to leave the meeting for brief periods.
- 1.1. 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.
- 1.2. It was confirmed that the meeting was quorate.
- 1.3. The Committee welcomed a run through of MOSL’s MO the Meter video, which would be launched in the coming weeks and shared via the MOSL website and social media channels. AS

also noted that MOSL would be happy to engage with any water companies that wanted to push the video out via their communications channels.

## 2. Minutes and Actions from Previous Meetings

- 2.1. The Committee agreed to approve the minutes of the Metering Committee meeting held on 16 May as an accurate record of the meeting.
- 2.2. It was agreed that the following actions would be closed: A26\_01, A26\_02 and A26\_03.
- 2.3. The Committee noted an update on the following actions, which would remain open: A15\_05 and A16\_02.
- 2.4. Following a brief verbal update from AC, the Committee agreed an accelerated process for signing meeting minutes off ex-Committee between meetings.

## 3. Interim National Metering Strategy

**MT joined the meeting**

- 3.1. The Committee noted a verbal update from AS on the feedback received from conversations with wholesalers on the impact of the Interim National Metering Strategy (“the Interim Strategy”). The feedback received was that the Interim Strategy had been very positively received and that it was being incorporated into Water Resource Management Plans as well as wider, long-term strategic thinking. Some wholesalers had also raised concerns around issues such as whether supply chains would be able to cope with increased demand for smart meters, the ability of market participants to cope with (and make best use of) increased data volume, and that if the back-end-resource cost required to make best use of smart meter data was not properly priced into WRMPs by all wholesalers looking for funding for enhanced smart meter roll out programmes then wholesalers may end up being financially penalised for smart meter roll out commitments.
- 3.2. Further feedback that there might be some benefit to a single, joined-up communications strategy to raise awareness among non-household customers that smart metering was coming and that further work to establish the business case for large meters being converted to smart would be helpful was also noted.

**CS left the meeting**

- 3.3. JD noted that the impact that has been seen with the Interim Strategy provided additional confidence that the ‘full’ National Metering Strategy can have an even bigger impact on the market and will prove to be a valuable piece of work that should be taken forward.
- 3.4. AS and the Chair thanked Committee members for all their work in supporting the development of the Interim Strategy, including bringing in specialist support where required which had been invaluable.

## 4. FY23/24 Metering Strategic Projects

- 4.1. The Committee noted the paper on proposed strategic projects to be taken forward by the Metering Programme in FY2023/24, which was circulated in advance of the meeting, as well as a brief verbal update from MH recapping the process for defining the strategic projects and outlining the proposal to take forward several themes under two broad headings (developing a long-term National Metering Strategy and developing a robust mechanism for sharing granular

consumption data in the market). It was noted that the themes being picked up within the two workstreams would be prioritised according to the ranking provided by the Committee at the May meeting and that all the proposed work was aligned with the Strategic Metering Roadmap.

4.2. MH provided additional detail on the proposed theme to develop a long-term National Metering Strategy, which would include:

- building on the Interim National Metering Strategy to: (1) describe the delivery requirements of smart metering and AMR metering, particularly focussing on areas where interoperability can be achieved; and (2) develop a series of 'use cases', including the transfer of smart meter readings to CMOS, retailer/customer access to granular data and use of loggers;
- work to understand the true cost of future meter reading ;
- working with the Market performance Framework ("MPF") Reform team to ensure that metering incentives are properly incorporated into revised MPF;
- developing the business case for meter asset data improvement (this would be a scoping study only); and
- looking at the case for retailer or customer-led smart metering programmes (brief review and direction statement only).

4.3. MH provided additional detail on the proposed theme to develop a robust mechanism for sharing granular consumption data in the market, which would include:

- consideration of how granular consumption data or analysed results could be transferred;
- developing an outline specification for a common data platform through which all data could be managed and shared and produce a recommendation for the preferred approach either through a standard process or a common data platform;
- looking at how the market can make the most of AMR meters and data loggers;
- building on the work of Quick Strat Project 16 'Continuous Flow' to set out a standard approach to defining continuous flows;
- defining a set of principles for sharing granular consumption data in line with data protection regulation; and
- consideration of how the market could demonstrate its alignment with Ofwat's open data principles.

4.4. Committee members stressed the need for the National Metering Strategy to continue to make the case for smart metering technology and that this should be front and centre of the project and it was confirmed that this would be the case and that any future communications would be sure to provide this clarity.

4.5. As more smart meters were rolled out into the market, read responsibility would naturally shift to wholesalers for a larger proportion of meters in line with the smart meter read responsibility change proposal and it would be important to consider the impact this had on retailers and its implications as part of any further fleshing out of option 1 from the PA Consulting meter reading

roles and responsibilities work (transfer of read responsibility for all meters from retailers to wholesalers).

- 4.6. It was noted that MT volunteered to join the workstream on developing a robust mechanism for sharing granular consumption data.
- 4.7. Following brief discussion, Committee:
  - **AGREED** to endorse the proposed Strategic Projects for FY23/234.
- 4.8. The Chair thanked MH for his presentation and noted that the Strategic Projects would be communicated to the Strategic Panel who would have the opportunity to provide comment/feedback.

**CS re-joined the meeting**

## 5. Roles and Responsibilities – SMART Meter Reads Code Change

- 5.1. The Committee noted a verbal update from FM on the timeline for the Code change which had been approved by the Code Change Committee as well as the key questions that had been raised at a working group discussion which had considered solution design.
- 5.2. The Committee discussed the questions raised by the working group in relation to the proposed solution, noting the following key points:

### Issue 1: Should wholesalers submit smart transfer reads on request from the retailer?

- 5.3. Although, the issue of the provision of transfer reads being addressed as a part of this Code change was separate from the broader workstream looking at granular consumption data sharing, it would be important to understand how the data collected from smart meters would flow when finalising this element of the solution. For instance, if smart meter data was made available to retailers on a daily basis through a central platform or other data sharing process it would not be necessary to request a transfer read.
- 5.4. While, in many instances, it was expected that retailers would be able to access granular smart meter data through processes established with the relevant wholesaler, this Code change would need to set out a process that would work for all parties and would therefore need the process to be set for those who were not able to freely access granular consumption data.
- 5.5. A key issue was whether by creating a new process for transfer reads where a smart meter was in place, the change would make the market more, or less efficient.
- 5.6. Given that a new transfer read request process would likely involve the creation of an additional bilateral process to get the read into CMOS it was likely to make the market less efficient and the Committee was minded to support a solution that used existing processes with the expectation being that wholesalers would share granular consumption data with retailers that would allow them to extract actual transfer reads from that data. It was also emphasised that the provision of actual reads via smart meters on a monthly basis would enable far more accurate estimation than at present and, therefore, that even where a retailer did not have access to granular data and was not able to generate an actual read of their own, customers would benefit from this enhanced accuracy of estimate.

- 5.7. It was noted that an additional estimated reason code might be required as part of this Code change and that the supporting papers for the Code change should be very clear on the how this change would impact customer experience at transfer.

**MD and CS left the meeting**

Issue 2: Could wholesalers submit multiple smart reads per month?

- 5.8. Existing processes around registering a remote read flag meant that developing a new CMOS flag for 'commissioned smart meters' was likely to be an unnecessary complication to the change.
- 5.9. The capacity of CMOS to accept multiple reads per month would drive whether any suggestion that multiple reads per month was viable.
- 5.10. From a settlement and billing perspective, there would be no additional benefit to providing more than one read per month.
- 5.11. There would be some, limited, specific examples where complexities might need to be worked through for example if a single site had multiple meters and only one was smart, the retailer might need to find a way to coordinate reads on a single day for billing purposes or to serve contractual agreements where a retailer has agreed with a customer that bills will be based on reads generated on a specific day of the month. However, these examples would be relatively rare and would need to be addressed on a case-by-case basis. It was, again, emphasised that the purpose of the change was to generate accurate actual reads on a monthly basis for settlement purposes and that there would be processes outside of this change that would be established between wholesalers and retailers for the provision of granular consumption data that would resolve the specific issues raised.
- 5.12. Following discussion, the Committee was minded to support the position that the change should only allow wholesalers to enter one smart meter read per month into CMOS. It was also noted that some of the specific instances that would need to be managed on a case-by-case basis should be flagged as part of the change documentation as examples of where trading parties would need to mitigate a potentially negative impact.

Issue 3: Should retailers be notified of a read rejection

- 5.13. The Committee noted the proposal that retailers should be notified where a read is rejected because it fails a CMOS tolerance test, although it was felt that more detail on how wholesalers should engage directly with retailers around the provision of re-reads would be required before the Committee could fully endorse this aspect of the solution.

Issue 4: Who is responsible if the smart meter is broken and not recording? Should the Retailer be raising a B5?

- 5.14. Questions were raised as to where responsibility would lie for generating a visual read if a smart meter was broken, and it was suggested that where this was the case, and wholesaler processes had not addressed the issue, retailers should be able to raise a bilateral request for the wholesaler to fix the meter.
- 5.15. It was further noted that some in some instances, such as where a skip has been placed over a meter and connectivity is lost because of customer activity, would require collaboration between retailers and wholesalers to resolve.

- 5.16. It would be important to pick up how issues around broken meters and missed reads were picked up in terms of MPS charges and wholesaler performance reporting.
- 5.17. It would be important for wholesalers to provide guidance on what should be expected in terms of their approach to addressing lost connectivity and broken meters. For example, where meter manufacturer guidance is that lost connectivity will often resume within 30 days and wholesaler processes therefore mean that they will not usually send someone out to examine a meter until after this period, this should be clearly communicated to retailers. It was suggested that a smart meter protocol could be developed along the same lines as the outreader protocol.
- 5.18. Following discussion, the Committee was minded to support the position that, where a smart meter is installed, the change should place responsibility for addressing issues with broken meters or lost connectivity and submitting meter reads into CMOS with wholesalers.

**MD re-joined the meeting**

Other points raised and next steps

- 5.19. Some concerns were raised that retailers might want the comfort of reviewing and approving smart meter reads before they were entered into CMOS, and it was again stressed that providing the evidence base demonstrating the accuracy of smart meter reads (and that anomalous reads were usually as a result of something happening on site rather than error) would be fundamental to making the case for this change. It was also noted that there would be processes in place to challenge reads and for a retailer to remove a read from CMOS where they disagreed with it.
- 5.20. FM summarised the next steps and the timetable for the change which would include finalisation of the solution and the development of a wholesaler smart meter read process map which would be submitted to and discussed with the MOSL Internal Design Authority on 14 June before a high-level assessment of the cost of the change was provided by CGI. A draft consultation note and questions would then be prepared and come back to the Committee for review and approval at its July meeting before the consultation opened in early August.
- 5.21. The Chair thanked FM for her presentation and committee members for their input.

## 6. Roles and Responsibilities – Defined Circumstances Code Change

**CS re-joined the meeting**

- 6.1. The Committee noted a verbal update from AH that included a recap of discussion at the May Committee meeting and clarification on a question around what would happen to customer bills with any retrospective data amendments as a result of getting an actual read for a LLUM and the data on the breakdown of different categories of LLUMs and LLUMs with bilaterals raised against them.

**RB left the meeting**

- 6.2. The Committee also noted a verbal update from MH on the potential options for taking forward a Code change for a change in read responsibility for external LLUMs and internal occupied LLUMs from retailers to wholesalers. The two options proposed were:
  - Option 1: transfer responsibilities for external meters and internal occupied LLUMs to wholesalers. This would include:

- requiring wholesalers to read and submit meter readings for LLUMs (external and internal with asset issues) and make LLUMs readable or remove them from the market (where appropriate);
  - transferring the MPS charge for meter reading to wholesalers and increasing penalty charges on wholesalers where the LLUM is not resolved within six months of the change in read responsibility; and
  - giving MOSL the autonomy to use CMOS and Bilateral Hub as necessary to facilitate the above actions.
- Option 2: increase penalty charges for Wholesalers as part of MPF Reform. This would include:
    - suspension of MPS18 and MPS19 charges where a retailer has raised a bilateral request against a LLUM (to be picked up as part of the MPF Reform quick wins);
    - requiring wholesalers to resolve bilateral requests raised against LLUMs, either by making the meter readable and entering a W read along with a revised instruction in CMOS or removing the meter from the market (where appropriate);
    - a tightening of rules on the use of deferrals for LLUM bilateral requests, an audit on the use of deferrals and additional reporting on their use for LLUM bilateral requests to the Market Performance Committee and/or the Metering Committee; and
    - increasing penalty charges on wholesalers where the LLUM is not resolved within six months of the bilateral request being raised.

6.3. The Committee discussed the proposed options, noting the following key points:

Option 1

- It was noted that part of any change under Option 1 would require the creation of definitions of what was meant by a readable meter in order to provide clarity on where responsibility for reading a meter would move back to the retailer after the wholesaler has generated a read.
- Issues around access to premises that would require retailers to facilitate customer contact should be considered as part of any change under Option 1.

Option 2

- It would be useful for the processes set out under this option to include a standard evidence pack that would sit alongside the bilateral request and detail the actions undertaken by the retailer to try and read the meter and customer contact details (including alternative contact details where possible). This would be particularly useful for internal occupied LLUMs where customer access issues had been experienced.
- The purpose of this option was to get the right incentives in place to drive the right behaviours that would lead to the resolution of LLUMs.
- The impact of any changes to the existing process on retailer and wholesaler holistic reporting performance should be considered as part of the development of this option.

- A question was raised over whether it would be possible for part of this option to include providing the ability for wholesalers to temporarily move a meter to assessed charging as an interim measure where access to an internally sited meter is proving especially challenging (noting that current rules do not allow a move to assessed charging until the property has been accessed).

#### **RB re-joined the meeting**

- While it was recognised that the work of the Central Data Cleanse would likely reduce the number of LLUMs in the market, concerns were raised about wholesaler and retailer capacity to deal with the volume of bilateral requests if all external and internal occupied LLUMs were subject to bilateral requests being raised in a short period of time.
- It was suggested that consideration be given to tweaking the timeframe on the proposed suspension of MPS18 and MPS19 charges to allow a period of time for retailers to raise bilateral requests and potentially allowing longer than six months for wholesalers to work through the bilaterals raised before an increased penalty is applied to recognise the reality of resources and the volume of bilateral requests that will be raised. Additionally, there was some suggestion of introducing a shared penalty charge for failure to resolve LLUMs so that a collaborative approach between retailers and wholesalers to resolving LLUMs was encouraged.
- Any solution development under Option 2 should consider the process for reading LLUMs that are trade effluent meters and whether wholesalers should and could be responsible for providing settlement affecting reads for trade effluent meters.

6.4. The Customer Representative member advised that they would caution against the removal of any current charges until the details of what the increased charges for wholesalers would look like, on the basis that it is imperative there is no detriment to customers and service is not allowed to deteriorate further through the proposed changes. As a result, the Customer Representative member noted that they would not be able to fully endorse Option 2 at this point.

6.5. Following discussion, the Committee:

- **AGREED** that Option 2 should be progressed.

#### Internal Vacant LLUMs

6.6. The Committee supported the proposal that Quick Start Project 17 'Internal Meters' should look at how internal vacant LLUMs would be resolved by implementing initiatives that would improve property access either via the customer or the landlord.

6.7. The offer from the Landlord TAP website to run a trial on providing landlord contact details was noted and would be fed into Quick Start Project 17.

#### Hard to Read Meters

6.8. The Committee supported the proposal that a pilot programme looking at hard to read meters and the issues currently preventing them from being made 'easily' readable should be undertaken. The Committee noted a request from MH for retailer members to send through ten (or more) examples of hard to read meters in their customer base along with a description of which hard to read category from the Committee's Definition document each meter fell under as well as photos and any additional commentary where possible.



## ACTION A27\_01

- 6.9. It was suggested that there might be some benefit to creating some kind of marker in CMOS so retailers were able to mark meters as 'hard to read' where they met the existing definition.
- 6.10. The Chair thanked MH for his presentation and noted that this would come back for further discussion as the changes proposed under Option 2, and the other elements outlined, were progressed and developed.

**RR left the meeting**

## 7. Data Interoperability Standard and Document Management Process

- 7.1. The Committee noted the paper outlining a proposed process for managing and updating Strategic Metering Programme documents as well as an updated version of the Data Interoperability Standard which incorporated a request to increase the meter index value definition from six point three to nine point three.
- 7.2. Due to time constraints, the Committee agreed to review and approve the proposed process and revisions to the Data Interoperability Standard ex Committee.

## ACTION A27\_02

## 8. QSP15 Sub Metering

- 8.1. The Committee noted a brief verbal update from PH and SB on the progress of Quick Start Project 15 'Sub Metering' including the CPW143 'Wholesaler maintenance of yearly volume estimates for non-market meters' Code change proposal which was taken to the June Code Change Committee and received Gate 1 approval before being formally approved as a Metering Committee change in order to meet an accelerated implementation timeline.
- 8.2. The Committee noted that CPW143 aims to create two new transactions in CMOS (T146.W and TCORR146.W) to improve volume estimation and enable Wholesalers to add or amend the Yearly Volume Estimates in CMOS for all Non-Market Meters that they supply at any point for relevant SPIDs.
- 8.3. It was noted that a new transaction might need to be part of the solution that would notify the retailer of the non-market meter read being put into CMOS so that billing systems can pick these up.
- 8.4. Following a brief discussion, the Committee:
  - **AGREED** to endorse CPW143 'Wholesaler maintenance of yearly volume estimates for non-market meters' as a Metering Committee proposal.
- 8.5. The Chair thanked PH for his presentation.

## 9. CPW123 Improved codes for 'remote read type'

- 9.1. The Committee noted the draft CPW123 'Improved codes for remote read type' post-implementation review paper as well as the feedback provided by some Committee members in advance of the meeting.

- 9.2. Due to time constraints, the Committee agreed that the CPW123 post-implementation review paper should come back for discussion at the July Committee meeting.

## 10. Tabled Updates

- 10.1. The Committee noted the Tabled Updates paper circulated in advance of the meeting detailing progress on the Committee's workstreams and metering-related projects.
- 10.2. The Committee also noted that the Meter Debris Guidance Document had been circulated for comment and approved ex-Committee and that this document would now be published on the MOSL website.
- 10.3. IM provided a brief verbal update on discussion of CPW141A 'Read Definitions' at the June Code Change Committee meeting, where it was unanimously recommended for approval by Ofwat, and that the consultation questions CPW141B 'Hard to Read' would come back for review by the Committee ahead of the consultation launching in August.

## 11. AOB, including reflections from the meeting

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