

Minutes of the Metering Committee Meeting 28

18 July 2023 | 09:30 – 14:00 | Via MS Teams

Status of Minutes: **APPROVED**

MEMBERS PRESENT

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

**Non-Voting Members of the Committee*

OTHER ATTENDEES

| | | | | | |
|-----------------|-----|----------------|------------------|----|------------------|
| Martin Hall | MH | MOSL Presenter | Evan Joanette | EJ | MOSL Presenter |
| Janet Judge | SPB | MOSL Presenter | Florentina Monea | FM | MOSL Presenter |
| Adrian Smith | AS | MOSL Presenter | Oliver Robins | OR | MOSL Presenter |
| Huw Comerford | HC | MOSL Presenter | Miles Robinson | MR | MOSL Presenter |
| Ivy Mandinyenya | IM | MOSL Presenter | Alex Cowie | AC | MOSL Secretariat |

1. Welcome and Apologies

- 1.1. The Chair welcomed everyone to the Metering Committee (“Committee”) meeting and confirmed that no apologies had been received. The Chair further welcomed SBD as a new member of the Committee, and it was noted that RR and CS would join the meeting late.
- 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 noted that the minutes of the Metering Committee meeting held on 13 June had been approved as an accurate record of the meeting ex-Committee and that these incorporated a minor change clarifying CB’s position on potential changes to charges applied for failure to read

legacy long unread meters that have a bilateral request raised against them under the meter reading roles and responsibilities defined circumstances workstream.

- 2.2. It was agreed that the following actions would be closed: A27_02.
- 2.3. The Committee noted an update on the following actions, which would remain open: A15_05; A16_02; and A27_01.

3. National Metering Strategy

CS joined the meeting

- 3.1. The Committee noted a verbal update from JD on the impact of the Interim National Metering Strategy (“Interim Strategy”), the messaging coming out of government agencies and the key themes coming out of the in-person User Forum discussion and progress in securing third-party consultant support for both the National Metering Strategy (“the Strategy”) and the Granular Consumption Data Sharing Process workstreams.
- 3.2. The Committee noted the areas suggested for inclusion in the Strategy, which included: continuing to make a strong case for enhanced smart meter roll outs; developing clear and consistent communication with customers on the benefits of smart metering; approaches to technology and what to do with the granular data generated; preparing for PR29.
- 3.3. The Committee commented on the areas to be covered in the long-term National Metering Strategy, noting the following key points:
 - It would be important for the Strategy to continue to make a robust case for the benefits of smart metering, including an advantageous business case and the role of smart meters in delivering national water efficiency targets and customer savings. It would also be useful for standard messaging on the benefits of smart metering to be developed and for this messaging to be used in customer communications explaining the rationale for smart meter roll outs, which could potentially be joint branded by retailers and wholesalers.
 - It would be useful for the Strategy to incorporate the expected process for maintaining a smart meter across its life cycle, including where responsibility lies for testing and maintenance. It was also noted that intelligent use of the data generated by smart meters would assist targeted use of field resource in the future and that the processes for checking and maintaining smart meters would not necessarily mirror those used at present.
 - When developing the Strategy and Granular Consumption Data Sharing Process, it would be important to ensure that aspects of meter reading roles and responsibilities are not picked up and developed in isolation and that roles and responsibilities remain an overarching focus as part of a dedicated workstream.
- 3.4. AS noted that the Committee’s feedback would be picked up and taken on board as part of initial conversations with consultants and invited any further feedback directly ex-Committee if, on reflection, members felt there were additional areas that should be covered which had been omitted from the brief.
- 3.5. AS further noted that the aim for both projects was to have draft documents available for discussion by the end of the calendar year and final reports launched in February 2024.

- 3.6. The Chair thanked AS and JD for their presentation and noted that both the Strategy and Granular Consumption Data Sharing Process would be a major and regular focus for the Committee as they developed.

4. MPF Reform Update

- 4.1. The Committee noted an update from EJ on the metering-related elements of the Market Performance Framework Reform (“MPF Reform”) Programme, including potential metering-related market metrics. It was noted that the actions previously outlined in relation to meter read responsibility where there is a legacy long unread meter (“LLUM”) as part of the Roles and Responsibilities workstream would now be picked up by the MPF Reform Programme.

RR joined the meeting

- 4.2. The Committee briefly discussed metering-related elements of the Market Performance Framework Reform Programme. Overall the Committee were very supportive of the proposals outlined and it was noted that CS would discuss how best to pick up a potential change relating to the extension of the read window with EJ ex-Committee to ensure that the work was either folded into the MPF Reform Programme or taken forward in coordination with it.
- 4.3. AS noted that MPF Reform Consultation 3 was scheduled to go out in early September, with a series of documents being published ahead of time and that these documents would be made available [via the MOSL website](#).
- 4.4. The Chair thanked EJ for his presentation and noted that EJ would attend the Committee on a regular basis going forward to brief on the development of the MPF Reform Programme and get the Committee’s input on metering-related elements.

5. QSP6 Hard to Read Meters

- 5.1. The Committee noted an update from CS and IM on the progress of the CPW141B ‘Clarification of Meter Chamber Ownership’ Code change and the draft consultation questions.
- 5.2. The Committee discussed the draft consultation questions, noting the following key points:
- It would be important to ensure that the consultation questions were phrased in a neutral manner as the purpose of the change was to clarify meter chamber ownership issues so as to prevent bilateral requests being rejected by wholesalers where a legitimate issue has been identified and to prevent retailers raising unnecessary bilateral requests where the issue was something within their responsibility. It was also suggested that the consultation questions should make it clear early on that this change is about changing existing wording in the Code to provide greater clarity. It was suggested that the following question could be included in the consultation “Do the proposed changes to the wording of the code provide the clarity needed to reduce unnecessary bi-lateral forms and/or forms being erroneously rejected?”
 - It was suggested that question seven “Do you agree that bilateral requests raised by Retailers to clear out, repair or replace meter chambers are being rejected by the Wholesaler?” be split into two questions – a retailer focussed question that asked “Have you have any bilateral requests raised to clear out, repair or replace meter chambers rejected by the Wholesaler?” (with a supplementary question asking for additional information on the reasons for rejection provided by wholesalers) and a wholesaler

focussed question that asked “What are the reasons you would reject bilateral requests raised to clear out, repair or replace meter chambers?”.

- It was noted that the Meter Chamber Debris Guidance (“the Guidance”) had been released since this change was raised and that this had been positively received by the industry. It was suggested that a question on whether the Guidance had been a useful tool when dealing with issues surrounding meter chambers should be included as part of the consultation along with a question on whether there are any areas of the Guidance that needed clarification or expansion. It was suggested that the wording of this question could be along the lines of “If any areas of the Guidance can be further improved or expanded upon, please highlight these with the appropriate supporting rationale.”.
- A question was raised as to whether running the consultation in August would lead to a low response rate, and it was noted that MOSL’s position, following consultation with trading parties on how they would like market requests to be managed, was to give as much notice as possible of a consultation or other request and to do everything possible not to deviate from the timing indicated in order to allow trading parties to plan in the necessary resource to respond.
- The scale of the issue in terms of the number of bilateral requests rejected was not currently known and it was hoped that the consultation would generate this data. It was also noted that although the number of instances where legitimate bilateral requests had been rejected might be low, the cost of resolving them would likely be high.

5.3. The Committee:

- **AGREED** to endorse an amended set of consultation questions that incorporated feedback provided in the meeting.

5.4. The Chair thanked CS and IM for their presentation.

6. QSP9 Standard Meter Location

6.1. The Committee noted an update from AB on a potential Code change to introduce a non-mandatory field for What3Words location data. It was noted that, should the Committee support this would initiate a Change Proposal being raised at Gate 1 at the Code Change Committee.

6.2. The Committee discussed the proposed What3Words change, noting the following key points:

- There was strong support for the concept of introducing a new non-mandatory field for What3Words into CMOS as use of What3Words for meter locations was already getting widespread traction within the industry. The role of What3Words in providing a benefit to customers by enabling more accessible information on their meter location was also noted.
- There was concern that introducing a new non-mandatory field for What3Words could lead to a disconnection between that field and the mandatory XY coordinates field (which the Committee agreed should retain primacy in CMOS), with the risk that meter location data could become more confusing if the two meter-location fields were conflicting. Several suggestions were offered to address these concerns, including:
 - producing an exceptions report that would highlight mismatches between What3Words and XY data in CMOS and could be used to trigger activity to review

and align the location data, although work would also be required to establish clear boundaries of responsibility for this activity;

- using existing CMOS XY location data to generate and auto populate What3Words location data, although it was noted that this would run the risk of potentially perpetuating incorrect location data; and
- creating functionality that prevented a What3Words location being entered into CMOS that conflicted with the XY data already held, this should drive a behaviour that would see incorrect XY location data updated at the same time as correct What3Words location data was entered.

- A question was raised around who would own the What3Words location field and the Committee of the view that this field should be joint-owned by the wholesaler and retailer if possible.
- Constraints on the MOSL change budget were noted and the Committee was of the view, given the issues for further exploration identified, that this should not necessarily be classed as a high-priority change.

6.3. The Committee:

- **AGREED** not to raise a What3Words Code change at this point pending further exploration and consideration of the issues raised.

6.4. The Chair thanked AB for her presentation and her work on the Standard Meter locations QSP.

7. QSP18 Logger to Smart Meter Switching Process

7.1. The Committee noted a brief update from RB on the development of the Logger to Smart Meter Switching Process Standard (“Logger to Smart Standard”) and the draft Logger to Smart Standard that had been circulated in advance of the meeting.

7.2. The Committee briefly discussed the draft Good Logger to Smart Standard, and it was noted that it would be beneficial for the Logger to Smart Standard to incorporate a standard process for reattaching a preexisting logger where a smart meter is being installed to replace a “dumb” meter.

7.3. The Committee noted a request from RB for feedback on the draft Logger to Smart Standard be provided ex-Committee.

7.4. The Chair thanked RB for his update, and it was noted that a reminder of the request for comment would be sent round by Secretariat following the meeting.

ACTION MC28_01

8. QSP20 Standard Metering List Format

8.1. The Committee noted a brief update from RB on the development of the Standard Metering List Format (“Standard Format”) and the draft Standard Format that had been circulated in advance of the meeting.

8.2. The Committee noted RB’s request that feedback on the draft Standard Format be provided ex-Committee and that, in particular, retailer representatives were being asked to comment on what

would be useful information for them and that wholesaler representatives were being asked to comment on what was feasible for them to provide.

- 8.3. The Chair thanked RB for his update and it was noted that a reminder of the request for comment would be sent round by Secretariat following the meeting.

ACTION MC28_02

9. Roles and Responsibilities – SMART Meter Reads Code Change

- 9.1. The Committee noted an update from FM on the progress of the CPW142 'Wholesaler Smart Reads' ("CPW142") change, including amendments to the proposed draft solution for consultation, consultation questions and change timeline.

- 9.2. The Committee noted that the solution now included a requirement for wholesalers to submit meter reads on a monthly basis where a smart meter had been installed, that the notification a read had been accepted would be sent to wholesalers and retailers and that the notification that a read had been rejected would be sent only to wholesalers and a new MPS20, which would mirror MPS19. It was further noted that provision of a transfer read by the wholesaler where a smart meter had been installed would not be picked up as part of the solution as currently drafted. It was also noted that further work to assess the impact of the change on CMOS capacity requirements was currently being undertaken by CGI and that this had the potential to significantly increase the cost of the change.

- 9.3. The Committee discussed the proposed solution and draft consultation questions, noting the following key points:

- Where a read was rejected because it failed CMOS validation, the probable root cause would be a leak or a change of use. Either of these should initiate customer contact, which would be retailer led. As such the Committee expressed concern that the proposed solution did not include an automatic notification of a read rejection that would go to the relevant retailer. The Committee noted that the notification of a read rejection could be passed from the wholesaler to the retailer but felt that this would be a more inefficient process. It was also noted that failure to provide retailers with notification of a read rejection might result in a deterioration of customer service levels.
- A question was raised as to whether CMOS read variation tolerance would need to be considered and revisited as part of this change to avoid unnecessary read rejections given the accuracy of smart meter data.
- Concern was expressed that the proposed solution would introduce penalties for wholesalers for activity outside of current Code requirements (e.g. penalising wholesalers for failing to submit a monthly read where a smart meter is in place where previously only a bi-annual read would have been required for the meter). Similarly, concern was expressed that the proposed solution did not allow the same (or any) read failure tolerance as applied to retailers before penalties for failure to provide a monthly meter read were applied. This was seen as a concern as, in some instances, meter manufacturer guidance indicated that more than one month should be allowed for a smart meter that is failing to provide data was investigated as in most instances the issue would resolve itself within the specified period without intervention.

- A question was raised as to where responsibility for the provision of a read into CMOS would lie where a smart meter had been installed but had, for whatever reason, become disconnected from the network but was still functional and readable manually.
- While it was recognised that incorrect reads should be a very rare occurrence, it was felt that the solution should incorporate a process for retailers to challenge and/or remove incorrect reads.
- The potential impact of smart meter data submission on CMOS capacity was noted as a potentially significant issue.

9.4. Overall, the Committee noted that the change had the potential to deliver benefits into the market (including a significant increase in settlement accuracy) but felt that a significant amount of further work was required on the proposed solution before it was ready to move to consultation as a future-proof, enduring solution for the market.

9.5. It was noted that the Committee would not be able to unilaterally delay the CPW142 consultation as the timeline for the change had been approved by the Code Change Committee and that any request to delay the consultation would be subject to Code Change Committee approval.

9.6. Following discussion, the Committee:

- **AGREED** to request that the Code Change Committee consider delaying the CPW142 consultation pending further work on the solution.

9.7. The Chair thanked FM for her work and Committee members for their input and noted the strategic nature of this change and the importance of getting it right, including ensuring that the solution was fully aligned with MPF Reform.

10. Roles and Responsibilities – Defined Circumstances Code Change

10.1. The Committee noted that the agreed actions relating to the Defined Circumstances workstream had been picked up as part of the MPF Reform update and that all further work in relation to LLUMs would be taken forward as part of the MPF Reform Programme with input from the Metering team and the Committee as required.

11. CPW123 Improved codes for 'remote read type'

11.1. 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.

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

12. Tabled Updates

12.1. The Committee noted the Tabled Updates paper circulated in advance of the meeting detailing progress on the Committee's workstreams and other metering-related projects.

13. AOB, including reflections from the meeting

13.1. The Committee reflected on the meeting.

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