

Minutes of the Metering Committee Meeting 32

14 November 2023 | 09:30 – 13:45 | Via MS Teams

Status of Minutes: **APPROVED**

MEMBERS PRESENT

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

**Non-Voting Members of the Committee*

OTHER ATTENDEES

Martin Hall	MH	MOSL Presenter	Alex Cowie	AC	MOSL Secretariat
Simon Bennett	SB	MOSL Presenter	Dene Marshallsay	DM	Artesia Consulting Presenter
Evan Joanette	EJ	MOSL Presenter	Dave Gough	DG	Artesia Consulting Presenter
Chris Dawson	CD	MOSL Observer	Marc Tritschler	MTr	PA Consulting Presenter
Liz D’Arcy	LDA	MOSL Observer	Natalie Martin	NM	Occutrace Presenter
Adrain Smith	AS	MOSL Observer	Florentina Monea	FM	MOSL Observer
Ivy Mandinyenya	IM	MOSL Observer			

APOLOGIES

Spencer Mattia	SM	Chair	Angela Brown	AB	Wholesaler Member
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1. Welcome and Apologies

- 1.1. The Chair welcomed everyone to the Metering Committee (“Committee”) meeting and congratulated CB on her appointment to the Strategic Panel and noted that apologies had been received from AB and SM.
- 1.2. The Chair and the Committee welcomed CD to the meeting, noting that he would take over from SB as programme lead for MOSL’s Strategic Metering Programme in the coming months.

- 1.3. 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.
- 1.4. It was confirmed that the meeting was quorate.

2. Minutes and Actions from Previous Meetings

- 2.1. The Committee agreed to approve the minutes of the Metering Committee meeting held on 17 October as an accurate record of the meeting.
- 2.2. The Committee agreed that the following actions would be closed: A31_01.
- 2.3. The Committee noted an update on the following actions, which would remain open: A15_05, A16_02, A29_01 and A29_02.

3. National Metering Strategy

- 3.1. The Committee noted an update from MTr on the progress of the National Metering Strategy (the "Strategy") project, including the themes emerging from the initial working group meeting and discussion with Ofwat.
- 3.2. MTr reminded the Committee of the three core questions the project is exploring: what current problems the Strategy should be directed to help solve; what opportunities the Strategy should help progress; and, what is out of scope for the Strategy.
- 3.3. MT provided an overview of the key themes emerging from the initial workshop, which included:
 - Expanding and defining the key audience for the Strategy beyond wholesalers and retailers to include Ofwat and Defra as well as the Strategic Panel all of who's work would need to take account of the strategy and need to action elements of it.
 - How metering contributes to a flourishing market needs to be clear, taking account of the work the Strategic Panel is doing to define what a flourishing market looks like.
 - The outcomes from delivery of the strategy need to be clear and include: all meters must be able to be read (both household and non-household); smart metering delivered by wholesalers must focus on delivering value across both the non-household and household markets; a target date for all meterable non-household premises to have a smart meter installed.
 - The responsibilities for engaging non-household customers and communicating with them needs to be clear.
 - The strategy for data interoperability needs to be clear.
 - Other issues to be addressed that were identified included: that LLUMs would need to be addressed in the strategy; that different meter sizes would need different approaches; the ongoing expenditure required to maintain smart meters once they are installed; the need to find and fix (non-deliberate) continuous flows; and how existing add-on equipment owned by parties other than the wholesaler interfaces with smart meters. The requirement for data interoperability was also stressed.

3.4. The Committee discussed the project progress and emerging themes, noting the following key points:

- It would be beneficial to have target dates for smart meter installation by postal sector rather than just a single date.
- The standardised approach to the end-to-end smart metering process in the energy industry was noted along with the potential benefits of such an approach, such as clarity of approach that forms the basis for competition and enhanced customer understanding of what they can expect from a smart meter. It was noted that a standardised end-to-end approach could be something that the water industry aspires to, however drawbacks to this were also acknowledged and it was also noted that the standardised approach adopted by the energy industry was largely a result of the retailer-led roll out of smart metering and the need to protect customers' ability to switch. In the round, it was thought best for the Strategy not to close down any options at this point and instead to set out the different approaches that could be taken (including an assessment of whether there are any decisions/actions that need to be taken now to enable a future standardised approach) as well as acknowledging the fundamental differences between the household and non-household markets and the need for retailers to work across multiple wholesaler regions in the non-household market.
- While energy infrastructure was not currently compatible with smart water meters, this could be addressed by SMETS 3 and progress in this area should be kept under review.
- [The House of Commons Committee of Public Accounts report 'Update on the rollout of smart meters'](#) was flagged to the Committee and it was recommended that the findings from this report be considered in the drafting of the Strategy.
- While the Strategy would promote the roll out of smart meters, the need for add on technology (i.e. data loggers) would remain as some customers need real-time data and this need should be taken into account by the Strategy.
- There is significant crossover between the Strategy project and other work being undertaken by the Committee, such as the Data Sharing Process project and the Continuous Flow and Logger to Smart Switching Process Quick Start Projects and it would be vital to ensure that these all worked together in tandem.

3.5. MTr outlined the next steps for the project which were to hold two further workshops, including a strategic workshop with senior leaders, and to continue to develop the report contents ahead of delivery of the high-level contents list and initial thoughts on what the Strategy could look like by the end of December.

3.6. The Chair thanked MTr for his update and noted that this theme would continue to be the focus of significant discussion at future Committee meetings and MH invited any Committee members with contacts at their organisations they felt should be involved in the strategic workshop to contact him and AS directly with their suggestions.

CS left the meeting.

4. Data Sharing Process

KM joined the meeting

- 4.1. The Committee noted an update from DM and DG on the progress of the Data Sharing Process project. At a high level, the data sharing questionnaire had been sent to key stakeholders and had received an encouraging response, two other stakeholder meetings had been held with Icebreaker One and SES Water and further work had been undertaken on alignment with Ofwat open data principles, and GDPR considerations (including the Thames/Anglian models and natural persons guidance).
- 4.2. Early insight from responses to the data sharing questionnaire included:
- Most respondents wanted to use 15-minute data for one or more applications. The main applications were identification of continuous flow and network data calculations.
 - Most respondents used data on a daily basis with, around half identifying problems accessing bulk data. Problems with the volume of data were starting to become apparent.
 - All respondents who use granular data were interested in quantifying leakage, both for customer information and water balance purposes and there was interest in better understanding customer behaviours.
 - Around half of respondents reported no GDPR issues, although reports of onerous red tape around access sign off were noted.
- 4.3. DM outlined the work being undertaken as part of the Ofwat Innovation Fund Project Breakthrough Challenge 2 to share useful water industry datasets in a secure, standardised and easy to access way.
- 4.4. DM described the Trust Framework used for data sharing (with explicit user consent) in the banking industry, including how rules for data sharing were co-designed by multiple parties (including regulators, trade bodies and commercial members) and how the agreed rules were implemented in a machine-compatible and verifiable manner.
- 4.5. DM noted that, in the short term there could be some value to creating a subset of anonymised granular data that can be used to encourage innovation. In the long term the solution for sharing granular data should incorporate open data principles, although this would require strict data governance principles to be rigorously applied.
- 4.6. DM described the three principal options identified for sharing granular data which were:
- the 'do nothing' solution, where wholesalers and retailers build their own data platforms and share data according to individual agreements and processes;
 - a central data sharing platform solution (either a unique non-household version or one that holds household and non-household data); and
 - a solution where the sharing of data from wholesalers' unique meter data management systems is facilitated via a trusted framework.
- 4.7. DG outlined the next steps for the project, which were to: set out the pros, cons and challenges for each option; develop a roadmap from the current state to various future states; and identify specific recommendations and actions. Follow on conversations with some survey respondents would be picked up in the coming weeks.
- 4.8. The Committee reflected on the update, noting the following key points:

- It would be important, in order to future proof the data insight form water smart meters, to ensure that it was possible to link data from a water smart meter to an energy smart meter. In this context, the Retail Energy Location which provides a single location ID for electricity and gas supply points to the same premises was noted and it was suggested that there might be some benefit to extending this to water meters. [Ofgem's information note on the Retail Energy location](#) was noted as a point of reference for Artesia.
- The Trust Framework was, potentially, a viable solution. However, work would be required to understand the where and how customer consent to data sharing would be required. Currently, customer consent to data collection for hourly consumption was not generally seen as being required as there were legitimate business reasons for wholesalers to collect this data. It was unclear whether consent was required for the collection of 15-minute data. Additional work would also be required to establish who the data owner is and to enshrine the customer as the entity that is able to provide consent for data sharing if required and it was suggested that Artesia engage MOSL's Head of Legal in this discussion as well as trading parties' subject matter experts.
- It was suggested that there might be some benefit to including household meters in the Data Sharing Process as this would enable efficiencies for wholesalers and could also help to solve issues where a premises regularly switches between the household and non-household markets. It was generally agreed that this would be a positive step as long as it did not create any competition issues.
- It was suggested that there could be benefit to aggregating granular consumption data by Demand Management Area in order to support future analysis.

4.9. The Chair thanked DM and DG for their update and noted that this theme would continue to be the focus of significant discussion at future Committee meetings.

5. QSP6 Hard to Read Meters

5.1. The Committee noted an update from CS detailing the changes that had been made to the Meter Chamber Debris and Covers guidance that involved clarifications on areas of wholesaler responsibility for meter chamber covers and clarification on customer benefit. This incorporated feedback received as part of [CPW142 'Wholesaler Smart Meter Reads'](#).

5.2. Following a brief discussion, it was:

- **AGREED** that Committee members would have a two-week window to close of business on Tuesday 28 November to review the Guidance and that unless any substantive comments were received by that point the updated Meter Chamber Debris and Covers Guidance would be taken as approved and published on the MOSL website.

5.3. The Chair thanked CS for her presentation and work on QSP6.

6. QSP9 Standard Meter Locations

6.1. The Committee noted a brief update from SB on the progress of the Standard Meter Locations QSP and that they were now being asked to review and endorse proposals to raise a Code change to add a separate, non-mandatory data item for a What3Words meter location item to CMOS.

6.2. The Committee discussed the potential Code change, raising the following key points:

- While the proposed new What3Words data field set out in the proposals would be wholesaler owned, it would probably be more beneficial for the field to be dual owned.
- A What3Words meter location could currently be recorded in the free descriptor field in CMOS.
- What3Words was already being used extensively by a number of trading parties to record meter location and adding a specific field would help CMOS keep pace with activity that is already underway in the market. It was also noted that one of the principal benefits of What3Words was that it was customer friendly. The potential for the change to provide more accurate meter location data and help to reduce long unread meters was noted.
- However, reservations were raised around the potential introduction of a new alternative data source that is unlinked to existing XY coordinate data. The significant issues with existing XY meter location data were acknowledged, and some members felt that without a requirement for the XY location data and the What3Words location data to be linked it would just introduce confusion and, without a plan as to how the data would be verified and maintained, there was no guarantee that it would improve current data issues.
- It was suggested that time might be better spent supporting the data cleanse and improving the accuracy of XY location data in CMOS and that the XY locations could then be used to generate a What3Words location. However, it was noted that the accuracy of XY location data was measured on whether the XY coordinates entered were in the correct postcode and that XY locations were often entered to represent the centre of the premises and not the actual meter location.
- If the What3Words location field was introduced, the change would need to consider how companies could bulk upload the What3Words location data currently in their systems.
- If the What3Words location field was introduced, consideration should be given to making this field mandatory for all new connections. Additionally, it might be worth considering whether there was the possibility to gain any efficiencies by introducing the What3Words field alongside any potentially useful additional new data fields such as Water Resource Zone.
- While the Committee was generally in favour of the proposal, which had the potential to provide more accurate meter location data, reduce long unread meters and support improved customer interactions, significant concerns remained around the practicalities of how the data would be managed to ensure high levels of accuracy and that confusion with conflicting XY location data did not introduce confusion.

6.3. Following discussion, the Committee:

- **AGREED** not to endorse raising a Code change at this point, but that this was something that could be reviewed in future subject to additional clarity on how the issues raised in the discussion would be addressed.

6.4. The Chair thanked SB for the presentation and AB in absentia for her work on this QSP.

7. QSP15 Sub Metering

- 7.1. The Committee noted an update from PH on the progress of QSP15 'Sub Metering'. The Committee noted that, following a medium-to-high CGI High Level Impact Assessment for the creation of an "R" read process that would allow Retailers to capture non-market reads and send them to wholesalers (which would effectively be a duplication of the "W" Read process), MOSL and the QSP15 group decided it would be more cost efficient to use the F7 Bilateral Process to share any "R" reads (as the cost of the change was potentially high and there were only 8,000 non-market meters). Due to the timing of the new Code change supporting the F7 process, the decision to take this option forward was taken before it could be discussed with the Committee.
- 7.2. project progress. were asked to endorse proposals to use the bilateral hub to introduce an R Read process for non-market meters.
- 7.3. Following a brief discussion, the Committee:
 - **AGREED** to retrospectively endorse the decision to share "R" reads for non-market meters via the F7 Bilaterals process.
- 7.4. The Chair thanked PH for his presentation and work on this QSP.

8. QSP16 Continuous Flow

- 8.1. The Committee noted an update on the progress of QSP16 'Continuous Flow', which included the feedback received for six wholesalers and seven retailer to the project survey which had been issued by MOSL on 18 September 2023. RR also outlined next steps in the production of Good Practice Guidance, which would be developed across December and January (in coordination with the work being undertaken by Artesia on the Data Sharing Process) and was expected to be shared with the Committee ahead of its February Meeting.
- 8.2. The Committee briefly discussed the update provided, noting the following key points:
 - It would be useful to develop a view of which wholesalers share smart meter data and what they do with it. This could be used to augment the existing RWG Good Practice Guide that details which wholesalers provide meter reading services to retailers in their region with additional details like smart meter data and continuous flow services.
 - The project would need to consider the introduction of a flag for genuine continuous flow at a premise. However, this would need to include benchmarking against expected use in order to avoid overlooking leaks and other wastage at genuine continuous flow premises.
 - While it was open for further discussion and debate, it was generally agreed that customers/end users should be provided with both the raw data and alerts informing them that they have continuous flows at their premises. It would also be vital to educate customers on what to do with the information provided to them in order to deliver the behaviour change opportunities available and reduce wastage and unnecessary consumption.
 - The relative cost of finding and fixing a leak was discussed and it was noted that the intention is for the Good Practice Guidance to split the activity required (and by whom) where a continuous flow is identified according to the scale of the continuous flow.

8.3. The Chair thanked RR for her presentation and work on this QSP.

9. QSP18 Logger to Smart Meter Switching Process

9.1. The Committee noted a brief update from RB detailing the background to the draft Logger to Smart Meter Switching Process Guidance, including how the feedback received from the Committee had been incorporated. RB noted that the Committee was being asked to endorse the Guidance for publication on the MOSL website.

9.2. Following a brief discussion, the Committee:

- **AGREED** to endorse the Logger to Smart Meter Switching Process Guidance.

9.3. The Chair thanked RB for his presentation and noted that the MOSL team would arrange for the Guidance to be published at an appropriate point to ensure that it was not lost among other market communications.

10. MPF Reform Update

10.1. The Committee noted an update from EJ on the responses to the metering-related metrics provided as part of the Market Performance Framework (“MPF”) Reform consultation.

10.2. The Committee briefly discussed the update provided, noting that similar feedback had been received on the CPW142 change as on the MPF Reform consultation around whether wholesalers with more smart meters were, effectively, being penalised and that it would be important to ensure a joined-up approach on how this potential issue was resolved.

10.3. The Chair thanked EJ for his presentation and noted that as the MPF Reform programme moved into detailed design work, the focus of these sessions at the Committee would move from general updates and ensuring awareness to providing assistance to the MPF Reform programme by workshopping specific items.

11. Project No Flow

11.1. The Committee noted an update from NM and CS on the findings from Project NoFlow, a MIF project that aims to establish the state of 2,000 varied supply points with zero-consuming meters (suspected to be broken) across all wholesalers, and provide a source of evidential data that outlines the extent to which manually read meters are contributing to the lack of accurate consumption data in the market. Of the 2,000 supply points, visits to 1,618 had been completed. The dataset was spread over different wholesaler regions and all of the supply points visited had no consumption recorded in CMOS for three consecutive reads.

11.2. NM summarised the project’s findings, which included:

- 17% of the meters visited (277 meters) were operating as expected and consumption was found.
- 30% of the meters visited (493 meters) had zero consumption and were found to either be physically damaged or another malfunction was established following a tap test.
- 52% of the meters visited (847 meters) were unable to be confirmed due to issues such as vacant premises or unwillingness from customers to permit a tap test.

11.3. The Committee briefly discussed the update, raising the following key points:

- It might be beneficial to alter the terminology in the report to state that the meter was not recording consumption rather than saying “no consumption confirmed” as this could be interpreted in different ways.
- It would be useful to clearly state the percentage of meters visited that were not recording consumption and the percentage of those that were found to be damaged early in the report.
- It would be helpful to include analysis of the failure rate by age of meter and analysis on whether the zero consumption meters were internal or external within the report.

11.4. NM confirmed that the next steps would be to finalise and publish the report and host a joint webinar with MOSL around the end of January or early February. The report was likely to include some recommendations such as the introduction of a meter assessment management programme, the replacement of broken meters with smart meters and actions to address specific CMOS data quality issues.

11.5. The Chair thanked CS and NM for their presentation.

12. Project LIDA 2

12.1. The Committee noted an update from MYB on the progress of the Market Improvement Fund (“MIF”) Project LIDA 2 which aims to devise a methodology for improved consumption benchmarking, water balancing and demand forecasting. MYB confirmed that the project had now completed.

12.2. The Chair thanked MYB for his update and noted that the final report from Project LIDA 2 would be circulated ex-Committee and that the findings would be looked at in conjunction with those from Project Discovery when considering next steps and actions from those two projects.

ACTION MC32_01

13. Tabled Updates

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

13.2. The Committee noted an update from FM on the progress of CPW142, which would come back for review of the consultation responses at the December Committee meeting. The Committee further noted that MH would take the responses to the questions posed in the consultation around the definition of a smart meter and would build them into the Smart Meter Definition paper previously discussed by the Committee and that this updated paper would be circulated ex-Committee with a request for approval.

ACTION MC32_02

13.3. The Committee noted an update from SB that QSP21 ‘Customer Access to CMOS’ was likely to be put forward as a potential MIF project.

13.4. MT noted that a colleague had expressed an interest in becoming involved in the New Connections QSP and it was agreed that she should put them in touch with SB.

14. AOB, including reflections from the meeting

- 14.1. The Committee noted an AoB from SB who requested that Committee members send across any ideas for new QSPs directly so they can be added to a list of potential QSPs that would be discussed by the Committee in the new year.
- 14.2. How the Strategy incorporates NAVs to ensure that NAV customers have the same access to smart meter data as the rest of the non-household market was flagged as a potential issue. It was also noted that there was the potential for NAVs to be set up as a workaround to wholesalers rejecting new connections in their regions because of a lack of water.
- 14.3. The Committee reflected on the meeting.
- 14.4. There being no further business, the Chair closed the meeting.