

Minutes of the Metering Committee Meeting 33

19 December 2023 | 09:30 – 12:30 | Via MS Teams

Status of Minutes: **APPROVED**

MEMBERS PRESENT

Spencer Mattia	SM	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 – attended for item 6 only	SBD	Retailer Member	Angela Brown	AB	Wholesaler Member
Mark Doherty	MD	Retailer Member			

**Non-Voting Members of the Committee*

OTHER ATTENDEES

Martin Hall	MH	MOSL Presenter	Liz D’Arcy	LDA	MOSL Observer
Florentina Monea	SM	MOSL Presenter	Alex Cowie	AC	MOSL Secretariat
Simon Bennett	SB	MOSL Presenter	Dene Marshallsay	DM	Artesia Consulting Presenter
Adrain Smith	AS	MOSL Observer	Dave Gough	DG	Artesia Consulting Presenter
Chris Dawson	CD	MOSL Observer	Marc Tritschler	MT	PA Consulting Presenter

APOLOGIES

Mitchell Yeoman-Boldry	MYB	Wholesaler Member
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1. Welcome and Apologies

- 1.1. The Chair welcomed everyone to the Metering Committee (“Committee”) meeting and noted that partial apologies had been received from MYB and that SBD would attend for item 6 only. The Chair also noted that MT would join the meeting slightly 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 agreed to approve the minutes of the Metering Committee meeting held on 14 November as an accurate record of the meeting.
- 2.2. Following a brief update from AC on the status of A29_01, the Committee agreed that the following actions would be closed: A32_02, A29_01
- 2.3. The Committee noted an update on the following actions, which would remain open: A15_05, A16_02, A29_02 and A32_01.
- 2.4. AC noted that no substantive comments had been received on the Meter Chamber and Covers Guidance by deadline agreed at the November Committee meeting and that, as agreed at that meeting, the Guidance was now approved and would be published on the MOSL website.

3. National Metering Strategy

MTr joined the meeting.

- 3.1. The Committee welcomed a brief update from MTr on the development of a draft outline National Metering Strategy (“Outline Strategy”) for the non-household water market. The Outline Strategy had been developed by PA Consulting between October and December 2023 and was now substantively complete. In producing the Outline Strategy, PA Consulting had: reviewed the work undertaken by the MOSL’s Strategic Metering Review and the Committee, the status of wholesalers’ PR24 plans and WRMPs; identified key questions relating to the purpose, scope and content of a National Metering Strategy; held workshops with both a working group and a strategic working group to explore the key questions and obtain inputs at both the practitioner level and the strategic level; synthesized all the inputs obtained to develop key requirements and clear themes for the strategy; and translated this into the Outline Strategy.
- 3.2. The Committee noted that the Outline Strategy document, which was circulated in advance of the meeting, provides the proposed structure and outline for the National Metering Strategy, identifies the key challenges that the strategy will need to address, and proposals for how these could be addressed (including the stakeholders who will need to participate in addressing them). The Committee further noted that in addition to an introduction, executive summary and section outlining the purpose, context and scope of the National Metering Strategy, the sections proposed by the Outline Strategy for inclusion were:
 - the case for change, and benefits of metering to non-household customers and the market;
 - wholesalers’ metering programme delivery and their interactions with NHH customers and the market;
 - consistency across Wholesalers’ metering solutions and services for NHH customers and the market;
 - serving NHH customers irrespective of the type of meter they have and how consumption data is collected;
 - considerations outside the direct remit of Wholesalers and the market; and
 - a summary of outcomes and the timeline for delivery.

MT joined the meeting.

3.3. The Committee were briefly discussed the draft Outline Strategy, and raised the following key points:

- The Outline Strategy presented by PA Consulting was warmly received by the Committee who viewed it as an excellent piece of work.
- It would be important for the full National Metering Strategy to emphasise the importance of end users making good use of the data that becomes available as metering technology advances and that this would be a useful build on the Outline Strategy presented.
- Part of the purpose of the case for change and benefits of metering to the non-household market section in the Outline Strategy was to support wholesaler's proposed smart meter roll outs and continue to make the case for smart metering and the benefits it could bring to customers, water security and the market as a whole and to try and ensure that as a number of other pressures on resources land in the coming years ,wholesalers remain committed to their smart meter roll outs. The arguments made in this section would also be picked up and expanded throughout the full National Metering Strategy. It was further noted that there was the opportunity for the work being done on the drafting and development of the full National Metering Strategy in the early part of 2024 to sit alongside and support Ofwat's review of wholesalers' water resource management plans.
- While there was a need for the National Metering Strategy to exercise some caution and avoid being prescriptive in describing how trading parties should engage with and educate customers on how they can use the data they receive to manage their water usage, establishing some clarity about how the customer could engage, at least at a minimum level, and roles and responsibilities for communicating with customers would potentially be a useful inclusion that would allow more creativity of approaches to develop and avoid the potential for uncertainty to undermine benefit realisation.
- The drafting of the National Metering Strategy should look to provide clarity on what is meant by asking for non-household smart metering to be prioritised. It was suggested that this might include setting an expectation of specific coverage levels by the end of a specified period (e.g. Asset Management Period 8) or at a minimum for the levels of non-household smart meter coverage to match household coverage. It was noted that this would require support from Ofwat to give as much support as possible to the non-household market in its funding decisions and it was suggested that this was an area where MOSL and the Strategic Panel could try to provide support and influence.
- It would be important for the National Metering Strategy to emphasise the relative roles and responsibilities of parties as smart meters are rolled out and how these have changed, and this will be a key tenet in terms of determining how value will be derived from smart metering. Consideration should also be given to outlining standard processes for the delivery of smart meter data to avoid the potential creation of a large number of tailored programmes between each retailer-wholesaler pairing, which was seen as being an inefficient approach for the market.

- While it is, in part being addressed by CPW142 ‘Wholesaler Smart Meter Reads’, the roles and responsibilities for the provision of granular smart meter data and how provision of this data is funded should be fleshed out as part of the full National Metering Strategy.
- 3.4. MH noted that he would now pick up the drafting of the National Metering Strategy, using the Outline Strategy developed by PA Consulting as a basis for that work, and requested that Committee members send any further comments or thoughts on the Outline Strategy through to him directly. MH further noted that significant help and input from the Committee and others would be required to flesh out the specific points described in the Outline Strategy and that the working group that had been formed to help develop the Outline Strategy outside of Committee meetings would continue to support the development of the National Metering Strategy.
- 3.5. The Chair thanked MTr for his update and all of the work that PA Consulting had undertaken in the development of the Outline Strategy.

MTr left the meeting.

4. CPW142 ‘Wholesaler Smart Meter Reads’

- 4.1. The Committee noted the paper circulated in advance and welcomed a brief verbal update from FM, outlining the key points raised as part of the CPW142 ‘Wholesaler Smart Meter Reads’ consultation response, the outcome of working group discussions, the proposer’s view on these points and any impact on the proposed solution. Overall, the consultation responses were supportive of the proposed solution and only minor changes to the proposed solution had been incorporated following consultation feedback. The most significant change was the proposal for the T105.M process to be used as a notification of a smart meter read acceptance in place of the T109.M process as the T105.M already contained all of the required data items and would therefore be a more efficient vehicle for the purposes of this change. As a result of the change from T105.M, the proposed solution no longer included a notification of read rejection going to the retailer.
- 4.2. The Committee discussed the consultation feedback and proposed updates to the CPW142 solution noting that there had only been minor changes to the proposed solution discussed and agreed with the Committee prior to consultation, and raised the following key points:
- It would be important to ensure that any impact of the change on Bilaterals processes and proposed reformed Market Performance Framework was identified and managed and it was noted that the MOSL team would continue to pick this up as an internal action.
 - A number of Committee members expressed discomfort at the notification of smart meter read rejection going to the retailer being removed from the solution. Committee members expressed the view that, in most instances, where CMOS validation would reject reads as being outside accepted read variation tolerances this would be due to either a change in business process or a leak. In both of these instances, it would be important for the retailer to be notified so they were able to engage with the customer quickly and removing the automated notification of a read rejection put this potential benefit at risk. It was agreed that the MOSL team would take this issue away for further review and present a view back to the Committee at the January meeting.

ACTION A33_01

- Use of the F7 Bilaterals process for retailers to challenge smart meter reads they believed to be incorrect was noted, along with the expectation that a rationale for any challenge should be provided as part of the F7.
- It was confirmed that there were no immediate concerns over the impact of the proposed solution on CMOS capacity, although one member noted that where their organisation currently bulk uploaded smart meter read data to CMOS they needed to pause any other transactions being entered into CMOS.

4.3. No questions, comment or issues were raised in relation to the proposed SmartAMI definition.

4.4. Following discussion, the Committee:

- **AGREED** in principle to endorse the CPW142 solution as outlined, subject to further clarification on the feasibility and benefits of providing notification of a smart meter read rejection to the retailer; and
- **AGREED** to endorse the SmartAMI definition for publication.

4.5. The Chair thanked FM and MH for their update and all of the work they had put into CPW142 and working group members for their ongoing support and input ex-Committee.

5. Data Sharing Process

DM and DG joined the meeting.

5.1. The Committee noted a brief update on project progress from DM and DG. Further engagement had taken place with the self-supply community and a meeting had been held with Smart DCC to gain insights from their work in the energy sector. The three principle granular data sharing model options (Organic Growth, Central Platform and Organised (Peer-to-Peer) System) had been revisited and tested against what customers, retailers, wholesalers and the Market Operator would want any future model to deliver and the data access needs of those groups, and further work had been undertaken to map the three processes and develop an initial assessment of the pros and cons of each as well as an initial view on the potential costs to the market of each option.

5.2. In summary, the three principle options under review could be described as:

- **Organic Growth:** Current situation. Data providers (wholesalers and retailers) develop their own data platforms to allow access to granular data. There is a data specification detailing the data formats for sharing. Data providers determine what data is shared, how data is shared (process for sharing, e.g. API, SFTP, etc), who it is shared with and how to address GDPR issues.
- **Central Platform:** Centralised platform collates all the granular data from each of the data producers. Centralised QA, management, and access to data. Centralised governance.
- **Organised (Peer-to-Peer) System:** The 'trust framework' implements and automates the adoption of rules for data providers, aggregators and users, to share data securely at market-wide scale. It enables data assurance to flow between organisations peer-to-peer, while a Trust Framework verifies that organisations and their data sharing are compliant with the rules.

- 5.3. The Committee briefly discussed the update from Artesia, including the initial findings and recommendations and raised the following key points:
- The Committee welcomed the update and the work undertaken by Artesia. The insights from the conversation with Smart DCC were noted, including the potential access by authorised third parties and the market operator to all smart meter data and it was noted that while the Smart DCC model was an interesting point of comparison, such comparisons could not be direct due to differences in the smart meter ownership models in the energy and water sectors.
 - There was significant interest in the Organised (Peer-to-Peer) System. A potential challenge was outlined where it could prove difficult to identify customers to give approval for data sharing due to the number of customers who are on deemed contracts. Some challenge was also raised around the extent to which clarity currently exists on whether consent was required for smart water meter data collection and who the ultimate data owner is.
 - It was noted that the initial indications were that either the Central Platform of Organised (Peer-to-Peer) System would best support the introduction of smart tariffs.
 - It would be important for the granular data sharing process taken forward to enable retailers to analyse consumption data and flag leaks and continuous flow in addition to any work undertaken by wholesalers.
- 5.4. MH and the Committee thanked Artesia for their work, noting that the output looks to be building towards a clear and consistent set of next steps for the recommended option, as well as what the next steps would look like for the two options that were not ultimately recommended. It was noted that the ‘roadmap’ produced would be an adaptive framework which would also include key decision points along the way and when steps will need to be taken.
- 5.5. The Chair thanked MH, DM, and DG for their presentation.

DM and DG left the meeting.

6. QSP19 Trade Effluent

SBD joined the meeting.

- 6.1. The Committee noted a verbal briefing from SBD on the Trade Effluent-focused quick start project. SBD noted that private (customer owned) trade effluent (“TE”) meters SBD play a crucial role in monitoring and managing industrial and commercial wastewater discharges and that responsibility for TE meters is often shared between wholesalers and retailers, with wholesalers typically focussing on the effluent discharged into public sewers and undertaking sampling and retailers taking responsibility for accurate billing from TE meters. SBD described the state of the trade effluent (“TE”) reads in the market, the processes for which were legacies which had not changed with the opening of the market. Overall, 55% of TE meters had been read in the last 18 months, 29% of TE meters were long unread meters (“LUMs”) and 16% were legacy long unread meters (“LLUMs”) which had not been read since before market opening. SBD highlighted the potential impact of virtual TE meters on TE meter read levels and the proportion of TE LUMs and LLUMs by wholesaler and retailer.
- 6.2. SBD summarised the issues identified as being that:

- Readings from private TE meters are not being uploaded onto CMOS at an optimal frequency.
- Operational Terms - Market processes B12, B13 and B14 not being followed, applied and or enforced.
- Lack of understanding by wholesalers that primary responsibility of updating CMOS or retailers with TE meter details rests with them per processes B12,B13 & B14.
- Significant lack of TE knowledge and control of the process amongst retailers to receive and accurately validate the data ☒ contract/consent is directly between customer and wholesaler.
- No explicit obligations on customer responsibility ref submetering meter reads or reporting location/meter exchanges.
- Collection of private TE meter readings has been and remains a manual process.

6.3. SBD outlined some potential options for a future state with regard to TE meters that included:

- Enabling dual access to the free descriptor field in CMOS to allow wholesalers to provide metering details and updates they currently hold but are not able to input
- Wholesalers assuming complete responsibility for TE LLUMs in order to:
 - ascertain gaps in CMOS data;
 - complete a TE data cleanse i.e. locate and record locations to, create MVI files for Retailer; and
 - revert responsibility to Retailer after first successful location and read.
- Wholesalers to install Out Readers/ Limpet devices on hard to read/access and or mechanical TE private meters to enhance reading accessibility.
- Moving responsibility for all TE meters to wholesalers on a permanent basis.
- Adding customer contact details to CMOS to enhance TE access and communications.

6.4. However, SBD noted that before any of the above suggestions were taken forward or any TE meter guidance was developed engagement would need to be undertaken with wholesalers' dedicated TE teams and a data cleanse of all pre-market TE meters should be undertaken.

CB left the meeting.

6.5. The Committee briefly discussed the update provided, noting that:

- The roles and responsibilities for TE meters required review and clarification given the significant issues faced by retailers given their lack of control over TE meters. It was further noted that these issues lead to a high risk of inaccurate billing.
- There might be some benefit to exploring the possibility of introducing provisions that allow for the auto termination of TE meter consent where a premises is vacant.

6.6. The Chair thanked SBD for his update and the work he had put into taking this project forward.

7. QSP8 Transfer Reads

- 7.1. The Committee noted the paper circulated in advance and a brief verbal update from CS on the proposed Transfer Read Disputes Charter.
- 7.2. Following confirmation that there were no questions, comment or issues with the proposal, the Committee:
 - **AGREED** to endorse the Transfer Read Disputes Charter for publication.
- 7.3. The Chair thanked CS for her work on the project.

8. Tabled Updates

- 8.1. The Committee noted the Tabled Updates paper circulated in advance of the meeting detailing progress on the Committee's workstreams and metering-related projects and SB highlighted the request for Committee members to send through any potential new quick start projects to him directly in advance of the January Committee meeting.

9. AOB, including reflections from the meeting

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