

Minutes of the Metering Committee Meeting 36

19 March 2024 | 09:30 – 14:00

Via MS Teams

Status of the Minutes: Approved

MEMBERS PRESENT

Spencer Mattia	SM	Chair*	Richard Barton	RB	Retailer Member
Michelle Thompson	MT	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	Liz D’Arcy	LDA	MOSL Observer
Simon Bennett	SB	MOSL Presenter	Alex Cowie	AC	MOSL Secretariat
Adrian Smith	AS	MOSL Presenter	Natalie Martin	NM	Occutrace Presenter
Steve Formoy	SF	MOSL Presenter	Dave Gough	DG	Artesia Consulting Presenter
Evan Joanette	EJ	MOSL Presenter	Dene Marshallsay	DM	Artesia Consulting Presenter

APOLOGIES

Paul Heron	PH	Retailer Member	Christina Blackwell	CB	Customer Representative Member
Angela Brown	AB	Wholesaler Member	Kevin McCalliskey	KM	Wholesaler Member

1. Welcome, Apologies and Compliance

- 1.1. The Chair welcomed everyone to the Metering Committee (“Committee”) meeting and noted that apologies had been received from PH, AB, KM and CB.
- 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 20 February 2024 as an accurate record of the meeting.
- 2.2. The Committee agreed that the following actions would be closed: A35_01.
- 2.3. The Committee noted an update on the following actions, which would remain open: A15_05, A16_02 and A29_02.
- 2.4. SF noted that the Code Change Committee had reviewed CPW142 ‘Wholesaler Smart Meter Reads’ at its March meeting and that it had been recommended for approval to Ofwat. SF further noted that although the recommended implementation date was in December, meeting this timeline would be dependent on when Ofwat are able to make a final decision on the change and whether Ofwat run a Statutory Consultation following their decision.

3. Data Sharing Process

3.1. The Committee noted an update from Artesia on the progress of the Granular Data Sharing Process Report. DG outlined the feedback that had been received on the draft report, noting that the feedback had been broadly positive and that the comments received would be worked into the next iteration of the report and that a log of the comments received and the how they had been addressed would be circulated to Committee members alongside the final version of the report.

ACTION MC36_01

3.2. DM noted that further meetings would be held with the MOSL team prior to launch to finalise the recommendations and ensure that they are aligned with the National Metering Strategy. DM provided an overview of the latest version of the roadmap to taking a decision on the preferred option, which included the steps that would need to be taken, build dates and the potential timeline for implementation. [Immediate next steps from slides]

3.3. The Chair noted that as the Artesia Granular Data Sharing Process report was not making a recommendation on a preferred option, but instead outlining potential options and a set of proposed next steps, this report would not be subject to endorsement/approval by the Committee prior to publication.

3.4. The Committee discussed the update provided, noting the following key points:

- While a number of wholesalers had been active as part of working group discussions and had fed back as part of these sessions, they had not provided specific written feedback on the report, however the feedback provided as part of working group sessions and workshops had been captured by Artesia and would be worked into the final report as appropriate.
- The final report would be published on the MOSL website and the MOSL comms team would work to make sure it is picked up more widely and gets as much coverage as possible.
- The rationale for the timings set out in the draft roadmap to a decision on a preferred solution were based on greater visibility on the impact of some external factors such as Ofwat's final determination on PR24 which would be important context for the final decision. It was also noted that the time required for the proof-of-concept study was, at

this stage, somewhat unknown and that the length of the implementation stage would depend on a range of factors, not least which option was chosen as the preferred solution. It was agreed that it would be beneficial to reflect in the final version of the roadmap that timings for some of the next steps were subject to dependencies and were not fixed at this point.

- The governance structure that sits behind the preferred solution would, in part, depend on the type of system that is built (i.e. is it pull or push API), although it was noted that this could work the other way around with the system rules determining the type of system that was built.
- It would be important to consider potential impacts on competition as part of the process to identify a preferred solution as well as during the design and build phases.
- The proof-of-concept testing phase set out in the roadmap would involve testing for both the central platform and peer-to-peer options.
- Care would need to be taken with how what a 'peer-to-peer' system entails is communicated as without appropriate messaging this could be interpreted as being effectively the same as the 'organic growth' option.

3.5. DM thanked Committee members for their input at the meeting and more broadly during the development of the report.

3.6. The Chair thanked DM and DG for their update and their work on this project.

4. National Metering Strategy

4.1. The Committee noted an update from AS on the progress that had been made in drafting the National Metering Strategy (the "Strategy") which was due to be published before Easter. Version 2 of the Strategy had been widely circulated to a wide range of stakeholders with good, supportive feedback received. No major showstoppers or objections had been received and the team had been working to ensure that interested parties had a good line of sight on the Strategy and that there were no surprises. AS noted that there were a number of next steps and recommendations within the Strategy that allowed flexibility in how it would be implemented and that these would come back to the Committee as part of its work programme in the coming financial year.

- 4.2. SF noted that some feedback had been received which said that more Code changes should be introduced to ‘harden’ the Strategy but that this was not the preferred option as it removed flexibility and Code changes were not in any way ruled out with the current drafting.
- 4.3. The Committee discussed the update provided and the draft National Metering Strategy, noting the following key points:
- The Strategy was looking to retain flexibility around the approach to communicating smart meter roll out plans to customers, noting that the role that retailers wanted to take would vary from company to company and that successful communication, which resulted in a smooth customer experience, would depend on collaboration between wholesalers and retailers. Committee members viewed communications on smart meter roll out plans as being primarily a wholesaler responsibility and communications on the benefits of smart metering and data services as being a retailer responsibility.
 - A clear outcome of the Strategy was customer access to consumption data. This was picked up largely as part of the provisions around minimum data service provision standards. It was suggested that it would be beneficial to pull through an expectation that the provision of data services (as well as the potential to access additional/alternative services) would be communicated to the customer either by the retailer or on the Open Water website if possible.
 - Specific recommendations on how smart meter roll outs could be used as an opportunity to improve meter data in CMOS were not specified in the Strategy and would come back to the Committee as part of discussions around follow-up actions from the Strategy at future meetings.
 - Where there was a faulty smart meter, responsibility for investigating and fixing the broken meter sits with the wholesaler. At the moment this process is well understood but where smart meters are installed meters may temporarily stop transmitting data for a number of self-resolving reasons and per meter manufacturer advice, wholesalers are likely to wait a specified period before sending anyone out to look at the meter. Where this occurs, it would be critical to ensure that customer communication doesn’t fall through the gaps and that communication of the actions being taken by the wholesaler are clearly communicated to the retailer so they can inform the customer of what to

expect (e.g. we haven't been able to collect data and therefore your bill is estimated and what will happen next).

- It would be useful for the Strategy should allow additional flexibility for the finalisation of the Continuous Flow guidance being developed by QSP16.

4.4. AS thanked Committee members for their input on the Strategy, both within Committee meetings and ex-Committee which had been crucial to its development. AS noted that the Strategy would xxx. overview of timeline to publication and next steps. Also invited anyone to chat this week if they have any questions.

4.5. The chair thanked AS and SF for their update.

5. QSP6: Hard to Read Meters

5.1. The Committee noted a brief update from CS on the progress of QSP6 'Hard to Read Meters', which included a proposal to introduce a new 'Hard to Read' data item into CMOS to address the issue of trading parties inability to flag 'Hard to Read' meters in CMOS and a lack of visibility of the overall numbers of 'Hard to Read' meters within the market. This proposed 'Hard to Read' data item would be a retailer-owned data item and would be a drop-down list of 12 reason codes based on the Committee's published [Hard to Read Meter Definitions document](#). discussed and agreed whether to proceed with a potential Code change to add a "Hard to Read" data item in CMOS. CS noted that the request to review this issue and develop a Code change had been passed to QSP6 as part of the recommendations from the Committee's Meter Reading Roles and Responsibilities Strategic Theme and that the high-level impact assessment received from CGI for the creation of the new data item indicated that the cost of the change would be between £50,000 and £100,000.

5.2. The Committee discussed the potential Code change, noting the following key points:

- Retailers are able to flag 'Hard to Read' meters to wholesalers at present without the need for an additional data item in CMOS and could be pushing these meters as candidates for a meter exchange and/or a smart meter installation. Where a bilateral has been raised against a 'Hard to Read' meter, wholesalers should be incentivised to act. Additionally, as well as retailers being aware of which meters are presently 'Hard to Read', this information would also be known at wholesalers who provide a meter-

reading service. As such the only benefits of the change would likely be in the ability to report and track 'Hard to Read' meters at a market level.

- Given wholesaler commitments to smart meter roll outs and the direction of travel towards smart metering which the Committee was promoting, it was unlikely that the change would deliver value for money.
- In addition to the cost of the Code change itself, the potential change would also impose costs on trading parties to enter the data into CMOS and to keep it up to date.
- There would not be any reduction on the cost of the change as a result of CMOS having moved to the cloud. Some reduction on the cost of changes might be seen as part of longer-term CMOS changes but this impact was unlikely to be seen for a few years.

5.3. Following discussion, CS and the Committee:

- **AGREED** not to raise a Code change to introduce a 'Hard to Read' data item into CMOS at this time as it did not represent value for money.

5.4. The chair thanked CS for the update and all the work she had put into driving QSP6 forward.

6. MPF Reform

EJ joined the meeting.

6.1. The Committee noted an update from EJ on the progress of the Market Performance Framework ("MPF") Reform programme and the development of metering-related metrics. EJ noted that to make the process more efficient, Committee members were invited to join relevant sessions of the Performance Advisory Group ("PAG") where metering-related metrics and tools were discussed and input via that Forum rather than bringing these for discussion to both the Committee and the PAG.

6.2. The Committee briefly discussed the update provided, noting the following key points:

- It was likely that discussions around extending the window for MPS 19 would be picked up as a QSP in the coming financial year. However, the crossover between this potential Code change and the MPF Reform Programme was noted and that any resulting Code change should be developed under the umbrella of the MPF Reform Programme.

- It would be useful for the monitoring of the revised MPF's metering-related metrics to be able to distinguish where a smart meter is in situ as this would help to understand how smart data is being used and inputted into CMOS.

6.3. The Chair thanked EJ for his update and noted that per the revised approach to seeking Committee member input on metering-related metrics developed by the MPF Reform Programme, the Committee would be provided with regular updates on upcoming opportunities to input going forward.

EJ left the meeting.

7. Project NoFlow

7.1. The Committee noted an update from CS on the findings and recommendations from the Market Improvement Fund Project NoFlow, the final report of which had now been finalised and published. CS reminded the Committee that the purpose of Project NoFlow was 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. CS noted that all the SPIDs selected were at occupied premises as per Wave's billing systems. Of the sample of 2,000 SPIDs with zero consuming meters, the Project NoFlow team completed 1,618 visits and found:

- In 17% of instances the meter was visibly ok and the premises was consuming water.
- In 30% of instances the meter was clearly damaged and zero consumption was confirmed.
- In 52% of instances the team were unable to confirm whether the meter was operational. Of these: 27% were vacant premises; 17% were premises where the team were unable to test the meter; and in 42% of instances the meter was not accessible.

7.2. CS noted that the project had identified a correlation between meter age and a meter's propensity to fail and that a quarter of meters were failing within 10 years of installation. CS noted that addressing the issues identified by Project NoFlow would require a highly collaborative approach, with MOSL, Ofwat, the Strategic Panel, retailers, wholesalers, and their operational and meter reading service providers, all working together towards a

common goal of accurate and timely meter reads with the customer being at the forefront.

The key actions identified were:

- For retailers to review their current operations to understand why incorrect information is imported into the market.
- For retailers to record meter issues with the correct SKIP codes and proactively work to resolve them with wholesaler support.
- For retailers to ensure that occupancy data is accurate and kept up to date.
- For wholesalers to work to ensure that the placement of new meter installations facilitate access to meter assets at all times.

7.3. The Committee welcomed the update provided on the findings from Project NoFlow and briefly discussed the findings and recommendations from the report, noting the following key points:

- The issue of unrecorded meter exchanges which was identified as an issue by Project NoFlow had also been noted as part of the CPW130 six-month review, and a question was raised as to whether this was a significant issue in the market.
- As part of the next steps it might be worth considering whether there was a way to flag zero consumption in CMOS alongside occupancy status. This would help to prevent wasted visits to confirm the meter is functioning if genuine zero consumption has been confirmed and the premises has not become occupied since the last visit.
- Some vacant premises were not zero-consumption and it would not be appropriate to assume vacancy status in CMOS as an accurate indicator that a meter should be recording zero consumption without any checks having been carried out.

7.4. While no immediate actions were identified for the Committee following on from Project NoFlow it was agreed that the MOSL team would review the report and any additional data analysis that could support MOSL-led activity and would report back to the Committee on this at a future meeting. This conversation would also incorporate suggested activity identified by Committee members, such as potential good practice guidance on zero flow and vacant properties.

ACTION MC36_02

7.5. The Chair thanked CS for her presentation and Wave and Occutrace for their work on the delivery of Project NoFlow.

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.

9. AOB incl. Reflections on the Meeting

9.1. The Committee reflected on the meeting.

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