



Trade Effluent Issues Committee Meeting 23

25 March 2020 | 10:30 – 14:30

Teleconference only

Conference Call: 0330 998 1253, Access Code: 969291114#

Status: Final

MEMBERS PRESENT

Name	Role
Evan Joannette (EJ)	Chair (MOSL)
Matthew Atkin (MA)	Committee Member (Wholesaler)
Andrew Stringer (AS)	Committee Member (Wholesaler)
Patricia Quintana (PQ)	Committee Member (Wholesaler)
Mark Needham (MN)	Committee Member (Wholesaler)
Carl Elsworth (CE)	Committee Member (Retailer)
Nick Butt (NB)	Committee Member (Retailer)
Rob Barker (RB)	Committee Member (Retailer)
Jamie Mack (JM)	Committee Member (Retailer)
Phil Sinclair (PS)	Committee Member (Retailer)

OTHERS PRESENT

Name	Role
Julie Whitelegg (JW)	Observer
Janet Bulbick (JB)	Observer
Ivy Mandinyanya (IM)	Presenter (MOSL)
George Kelly (GK)	Secretary (MOSL)
Abu Rashid (AR)	Presenter (MOSL)
Huw Comerford (HC)	Presenter (MOSL)

APOLOGIES

Name	Role
Daniel Rowe (DR)	Committee Member (Wholesaler)



1. Welcome and Introductions

PUPRPOSE: FOR INFORMATION

- 1.1 The Chair welcomed members to the Trade Effluent Issues Committee (TEIC) 23 Meeting.
- 1.2 The Committee noted apologies for members not present.
- 1.3 The Committee noted the agenda for the meeting.

2. Minutes and Outstanding Actions

PURPOSE: FOR DECISION

ACTIONS

- 2.1 The Committee agreed to close the following actions; TEIC21_07, TEIC21_08, TEIC21_09, TEIC22_02, TEIC22_03, TEIC22_04, TEIC22_05, TEIC22_06, TEIC22_07, TEIC22_10, TEIC22_11, TEIC22_12, TEIC22_13.
- 2.2 The Committee proposed for the following actions to remain open; TEIC21_02, TEIC22_01, TEIC22_08, TEIC22_09. It was determined that TEIC21_02 was to be moved onto being MOSL owned now (EJ taking ownership), TEIC22_01 is to remain open to be delayed for a month (See Miscellaneous Guidance [section 5](#) below). Actions TEIC22_08 and TEIC22_09 remain open and have no changes.
- 2.3 The Committee agreed the minutes from the last meeting with no changes.

3. Update on Bilateral Solutions Progress

PURPOSE: FOR INFORMATION

- 3.1 The Chair updated the Committee on the progress of the Bilateral Programme; it was noted that what were a handful of workstreams would be expanded into 10 workstreams but that MOSL would still rely on the advice of the former TEIC members as 'subject matter experts' throughout the programme.
- 3.2 The Chair noted that the 'design' was planned through Autumn 2020, with a 'build' anticipated for spring 2021.
- 3.3 PQ stated that the Bilaterals Request for information had been sent through to her, and she was planning to return to MOSL with trade effluent feedback as soon as possible.
- 3.4 The Committee noted that the MOSL staff resource would be switching from contractor to MOSL-based and therefore there were still some vacancies on the team and we were still looking into filling our requested company secondment positions.
- 3.5 A Committee member asked if the COVID-19 situation would affect the Bilaterals Programme timeframe. The Chair stated that much of the work was done over telecon anyway so no indication yet that there will be an impact on the Bilaterals project timeframe.

4. Use of Calculated Discharges Free Descriptor

PURPOSE: FOR INFORMATION

- 4.1 AR provided an analysis of how the Calculated Discharges Free Descriptor field is used by Trading Parties in the central system.
- 4.2 A Committee Member noted that their incumbent Wholesaler tended to use 'generic' as a descriptor which was not very useful. There is more useful information in the basis of the historic calculation behind that descriptor.
- 4.3 A Member proposed that better guidance in the Miscellaneous Guidance document could help Trading Parties use the descriptor better.
- 4.4 AR clarified this and stated that a retailer would still have to submit a form to achieve the specific calculation used to work out discharge charges.
- 4.5 Committee members noted and agreed that a historic calculations set up would be useful, but wholesalers need to put in other more important information into the Free Descriptor Field.
- 4.6 The Committee discussed that there should be a consistent approach to how volumes are calculated.
- 4.7 It was agreed to investigate as to whether the Calculated Discharges Free Descriptor fields should be included in the Miscellaneous Guidance, to add relevant information to help Retailers, rather than sending out numerous G/01 forms to gain this information.

ACTION: TEIC23_01

- 4.8 A Member noted the difficulties surrounding the enforcement and monitoring as it is a free text box. They proposed that the name of the box may need to be changed to make it clear to what is expected.
- 4.9 The Presenter noted that this would be a CMOS change. They stated that it would be useful to get an idea of the cost of this process before moving forward with this suggestion. The Presenter stated that use of the Text Comment Field will be monitored by MOSL in the 4-5 months following the publishing of the TEIC miscellaneous guidance, with a view to provide useful feedback to TEIC members.

ACTION: TEIC23_02

5. Miscellaneous Guidance Signoff

PURPOSE: FOR DECISION

- 5.1 The Committee agreed that Section 4 of the Miscellaneous Guidance was now complete.
- 5.2 The presenter (AR) proposed three options on how to move forward regarding section 5;
 - a) Remove section 5 and now issue Miscellaneous Guidance as v1.0.
 - b) Further collaborative work to complete section 5 before publishing.
 - c) Further collaborative work on the free descriptor of Calculated Discharges set up.
- 5.3 The Committee agreed on option (b) and (c). Miscellaneous guidance would be delayed by a further month until the enforcement and free descriptor section is done. MOSL (AR) would take this forward and review with Members at an informal meeting in April.

ACTION: TEIC23_03

- 5.4 JW and PQ agreed to discuss the relevant changes offline before the next meeting to provide updates on section 5 at the next informal meeting in April.



ACTION: TEIC23_04

6. SVAM Guidance Signoff

PURPOSE: FOR DECISION

- 6.1. It was questioned whether the use of domestic allowance in CMOS, with regards to it being permissible only against water meters, is reflected in the guidance. This was confirmed by a Committee member.
- 6.2. The Chair asked if anything was needed from TEIC members, but PQ confirmed that this Guidance Signoff was ready to go, and no more information was needed.
- 6.3. The Committee agreed to go forward with the signoff as it stands currently. PQ agreed to finalise and send the sign off to MOSL on the 26 March 2020 in order to go onto the MOSL website as soon as reviewed by EJ.

ACTION: TEIC23_05

ACTION: TEIC23_06

7. Consultation Review: CPW085

PURPOSE: FOR DECISION

- 7.1. The Committee considered the salient feedback and themes that MOSL received from respondents as part of the CPW085 consultation. The presenter (HC) worked through each point to get the Committee's view on how to address the feedback:
 - 7.1.1. Concerns that CPW085 breaches the Water Industry Act as the contract is between the Wholesaler and Customer; the Committee noted that they were unsure whether the change proposal does breach the WIA as it simply doesn't allow SPID status to change to vacant if there is a DPID attached. It was stated the change proposal allows charges to continue even though the SPID stays vacant. The Committee agreed it could send its feedback to Castle Water before the DRR goes to Panel which might help elucidate further clarity from Castle Water.

ACTION: TEIC23_07
 - 7.1.2. It was proposed by a respondent to the consultation that a 10 Business day SLA should be added to the G5 process. While the Committee accepted this proposal was interesting, it related to a different process and therefore didn't fall under the scope of this proposal. The Committee recommended that if any Trading Party did have an issue with the SLA for G5, it should be raised as a separate change, citing the consistency argument (assuming CPW085 was approved).
 - 7.1.3. One respondent raised there may be valid reasons for a live DPID when a property becomes vacant, for example, a refuse site. The Committee believed that this isn't correct as some party will still be responsible for the site if it is still operating, so charges would still need to be raised against it in this situation.



- 7.1.4. No SLA requirement for the DPID to be removed – Retailers incur costs as Wholesalers are charging for this service; a member stated that there's market disagreement as to the date when terminations are undertaken and some Wholesalers don't backdate. It was agreed by Committee members that this required further investigation before agreeing a solution, if one is required.
- 7.1.5. What happens when there is no one to sign G/06 Termination form; Committee members stated that different closures/terminations/administration/liquidations require different processes. In this regard, the Committee agreed that no change to the current process is required through this change proposal. A Committee Member noted that some Wholesalers do accept unsigned forms in certain situations in this situation, which could be an answer to part of this problem. It was agreed that this current change proposal isn't out to change this aspect of the issues raised. It was agreed that this aspect would require further investigation from the Committee.
- 7.1.6. Is there requirement for an error code to be returned by CMOS for a change to vacant status when there is a current TE consent; the Committee noted that an error code would be required, and this would require further investigation from the proposer.
- 7.1.7. Confusion about what had to be done within the 10-day SLA; The Committee clarified that the 10-day SLA is a target for work to actually be completed, or to be reported back as to why it cannot be completed. They agreed the solution and the legal drafting will need reviewing to ensure this is reflected correctly.
- 7.1.8. One respondent stated it supported the change proposal if TCORR121 could be used without its functionality being impacted by the validation – either a cleanse activity, or SPID consolidation; the Committee noted that the best move forward was that the SPID should be changed so it is not vacant for the specific period. It was discussed by the committee that a TCORR can be done for this situation. A Committee member stated that there shouldn't be a move of one DPID to another with a vacancy status attached as it potentially wasn't vacant. The Committee agreed there should be a retrospective update on vacancy status on the SPID to avoid the move to the new SPID. The Committee agreed that there is a fix for this issue, but the issue doesn't come up very often and they are very low in number. A comment will be added to the DRR with reference to both concerns.

ACTION: TECI23_08

- 7.1.9. There was a suggestion to remove proposals 2 and 3 from the solution, so that the Wholesaler can create DPID on vacant SPID to allow retrospective amendments to take place; a Committee member stated that if you allow the creation of a DPID on a vacant SPID this goes against the whole proposal; agreement with this aspect would mean you would not want the change proposal to go ahead. The Committee suggested that there is a fix for this issue; to update a SPID so it is not considered vacant up until the point that creation of the DPID takes place (so the period that the DPID is applied to is no longer vacant).



7.1.10. A respondent proposed that some of the proposed code drafting was incorrect and that the change should remove '*within 10 BD of the date...of termination request by Retailer.*' The Committee agreed to check the process flow diagram to ensure the right code drafting has been proposed. *This required a solution.*

7.1.11. Should Retailers be able to make retrospective amendments in the market data set once the trade effluent consent has been formally ended?; The Committee agreed that Retailers can't change the vacancy status if there is a DPID attached to it, which is the point of the change proposal. Changes could be made if the SPID was outside of a consent period. It was agreed that if the SPID was inside of a vacancy state, there should be no need to change the data anyway.

7.1.12. If TE consent is removed upon vacancy, the SLA for a new DPID to be created is 60 BD; The committee stated that this change proposal isn't saying a DPID should be terminated without prior checks given changes to occupancy or legal status; thus, this scenario shouldn't be experienced. The Committee agreed that there is a 60-day lag in these situations which cannot be avoided. The Committee noted there is an inherent conflict within these changes; wholesalers issue the DPID to a legal entity in this lag period, before the DPID is transferred to the new occupier. A Committee Member stated that due to differing opinions between Wholesalers and Retailers, a resolution was unlikely achieved as part of CPW085 and that this should be noted in the DRR.

ACTION: TEIC23_09

7.2 The Presenter asked the Committee how best to move forward with this change proposal. The Committee noted that some of these issues raised during this discussion required that it revisit the solution.

7.3 The Committee discussed having separate meetings to discuss the solutioning for this change proposal. The Chair asked for a main proposer and another backup individual for this proposal. PQ was named as the proposer for this, and RB offered to volunteer as another point of contact for the solutioning discussed above outside of TEIC. The Committee discussed that continued discussions are required for solutioning this change going forward outside of TEIC. The Committee agreed that these discussions would have to finish, and solutions determined before June 2020 Panel; therefore, the DRR would have to be signed off by the end of April. PQ stated that she needed AR's support for helping with the Error Codes.

ACTION: TEIC23_10

7.4 It was discussed as to whether the change proposal should go back to consultation. PQ stated that she would discuss with AR post solution redesign to see if any changes were material. If they were, another industry consultation may be advisable.

ACTION: TEIC23_11

8 A.O.B.

PURPOSE: FOR INFORMATION

8.1 Pipeline Change Proposal: MPS9 Removal

- 8.1.1. The Committee agreed that this report will be completed and circulated to members for feedback in the two weeks following this meeting before it is submitted to MOSL as a formal change. Expected to be received before the end of April 2020.
- 8.1.2. PQ stated that she felt the TEIC was in agreement on how to proceed.
- 8.1.3. CE would support PQ in reviewing before submission.

ACTION: TEIC23_12

8.2 Pipeline Change Proposal: Meter networking/SUBTRACT

- 8.2.1 The Committee noted that the change proposal had been raised, and the draft had been sent to PQ, who was to liaise with AR before sending to MA to review. The Committee agreed they were working towards a May 2021 release.

ACTION: TEIC23_13

- 8.2.2 The Chair proposed that the proposer should consider giving his change a more plain-English and descriptive name.

8.3 Impact of Coronavirus

- 8.3.1 A Committee member questioned how TE sampling schedules at Wholesalers have been affected and if they are being carried out as usual. JW noted that they are continuing to sample but concentrating on high risk traders/customers (e.g. if customers have a high load (10% load) to a works, nature of a discharge such as methane, potential risks to the works/networks). However, it was noted that a 'high-risk' customer was determined to be very network/customer specific.
- 8.3.2 The Chair recommended that Wholesalers could send out an updated set of procedures to Retailers to update them on how TE sampling best practise is being altered during complications as a result of COVID-19.
- 8.3.3 Some Members agreed that processes had to be altered given the current difficulties. Wholesalers ensuring testing is done with new Personal Protective Equipment, and health and safety measures in place, in person discussions/team sampling occurring at safe physical distances away from one another to ensure government guidelines for social distancing had been adhered to.
- 8.3.4 Retailer Members have noted their agents have been refused access to customer sites.

8.4 Future TE concerns

8.4.1 The Committee agreed that members would attend an informal meeting to close outstanding issues on 22/04/2020 at 11:00 – 13:00. EJ is to send out invites (ensuring to copy in JW).

ACTION: TEIC23_14

8.4.2 The Committee proposed to create an enduring TE collaboration area via MS Teams or SharePoint between TEIC members and MOSL. MOSL would investigate the feasibility of doing so.

ACTION: TEIC23_15

8.5 The Committee agreed that there needed to be a TEIC report sent to the Panel regarding outlining what was achieved during this TEIC term.

ACTION: TEIC23_16

8.6 The Chair thanked Members and closed the final TEIC meeting.

NEW ACTIONS:

Action Number	Action
TEIC23_01	AR to investigate to whether it is possible for the Calculated Discharges Free Descriptor fields should be included in the Miscellaneous Guidance, to add relevant information to help retailers, rather than sending out numerous G/01 forms to gain this information
TEIC23_02	AR to investigate increasing the visibility of the text comment field in setting up calculated discharges and to monitor use of it over 4-5 months following issuance of the TEIC miscellaneous guidance, with a view of provide feedback to members.
TEIC23_03	AR/AS/JW to decide on a solution to how best to move forward with section 5 of the Miscellaneous Guidance for a month, and to discuss this at the informal meeting in April.
TEIC23_04	JW and PQ to discuss changes to section 5 of the Miscellaneous Guidance away from TEIC meetings, ready to provide further updates at the April Meeting.
TEIC23_05	PQ to finalise and send out the SVAM Guidance Signoff as it stands currently to EJ by the 26 th March 2020.
TEIC23_06	EJ to review the SVAM Guidance Signoff and upload onto the MOSL website.
TEIC23_07	HC to send the TEIC response with respect to the concern Castle Water raised in relation to CPW085 (that the change proposal breaches the WIA), before the DRR goes to Panel.
TEIC23_08	HC to add in the two concerns/comments of the committee from the minutes (section 7.1.8) into the CPW085 DRR.
TEIC23_09	HC to include the TEIC viewpoints and comments with reference to the 60BD SLA if TE is removed upon vacancy in the CPW085 DRR.
TEIC23_10	PQ, AR and RB to support and continually discuss CPW085 for solutioning, going forward outside of TEIC. These discussions have to finish, and solutions deduced by the end of April 2020 (AR to assist with error codes).



<u>TEIC23 11</u>	PQ to discuss with AR after solutions determined for CPW085 to deduce if they have to go back to consultation.
<u>TEIC23 12</u>	PQ and CE to complete the MPS9 removal report and circulate to members for feedback in the next 2 weeks.
<u>TEIC23 13</u>	PQ to liaise with AR for some assistance on the detail regarding the 'Meter Networking and Subtract' draft, before sending it to MA for review.
<u>TEIC23 14</u>	EJ to send out the invitations to the informal TEIC meeting on 22 nd April 2020 (11:00-13:00), ensuring he copy in JW.
<u>TEIC23 15</u>	MOSL (EJ) to explore the possibility of creating a Trade Effluent-MOSL collaboration area via Microsoft Teams.
<u>TEIC23 16</u>	EJ to create a report outlining the achievements of TEIC since the first meeting to send to Panel.