

**MOSL**

# User Forum

*Online*

**Hosted by  
Markus Lloyd Olivia Bletsoe**

12 November 2025



# Agenda



Item	Description	Who	Time
1	Introduction and Welcome: MOSL	Markus Lloyd and Olivia Bletsoe	3 - 3:05pm
2	RWG: update	Fallon Wilkinson	3:05 - 3:15pm
3	Ofwat update: GSS Guidance, State of the Market and Customer Insight	James Hawthorne and Sarah Lafond	3:15 - 3.45pm
4	Change: update	Tom Daborn	3:45 – 4:05pm
5	Providing Assurance to the Market: Audit and Assurance Statement updates	Axelle Saada	4:05 to 4:20pm
6	Strategic Data Programme	Lisa-Ann Lott	4:20 – 4:35pm
7	Eligibility	Markus Lloyd	4:35 – 4:55pm
8	Closing	Markus Lloyd and Olivia Bletsoe	4:55 – 5:00pm

12 November 2025

# RWG update



# Sub-groups Highlights

## Drought:

- Meetings moved to monthly
- Focus over winter 2025 to complete Drought Communications good practice guide (consultation planned for March 2026) incorporating lessons learned
- Please contact [rwg@mosl.co.uk](mailto:rwg@mosl.co.uk) if you are interested in joining the sub-group (especially looking for further retailer colleagues)

## Water Efficiency:

- Chair role (thank you to Oli Shelley at Wave and welcome to Garry Beaver at Anglian Water)
- Seeking a retailer co-Chair

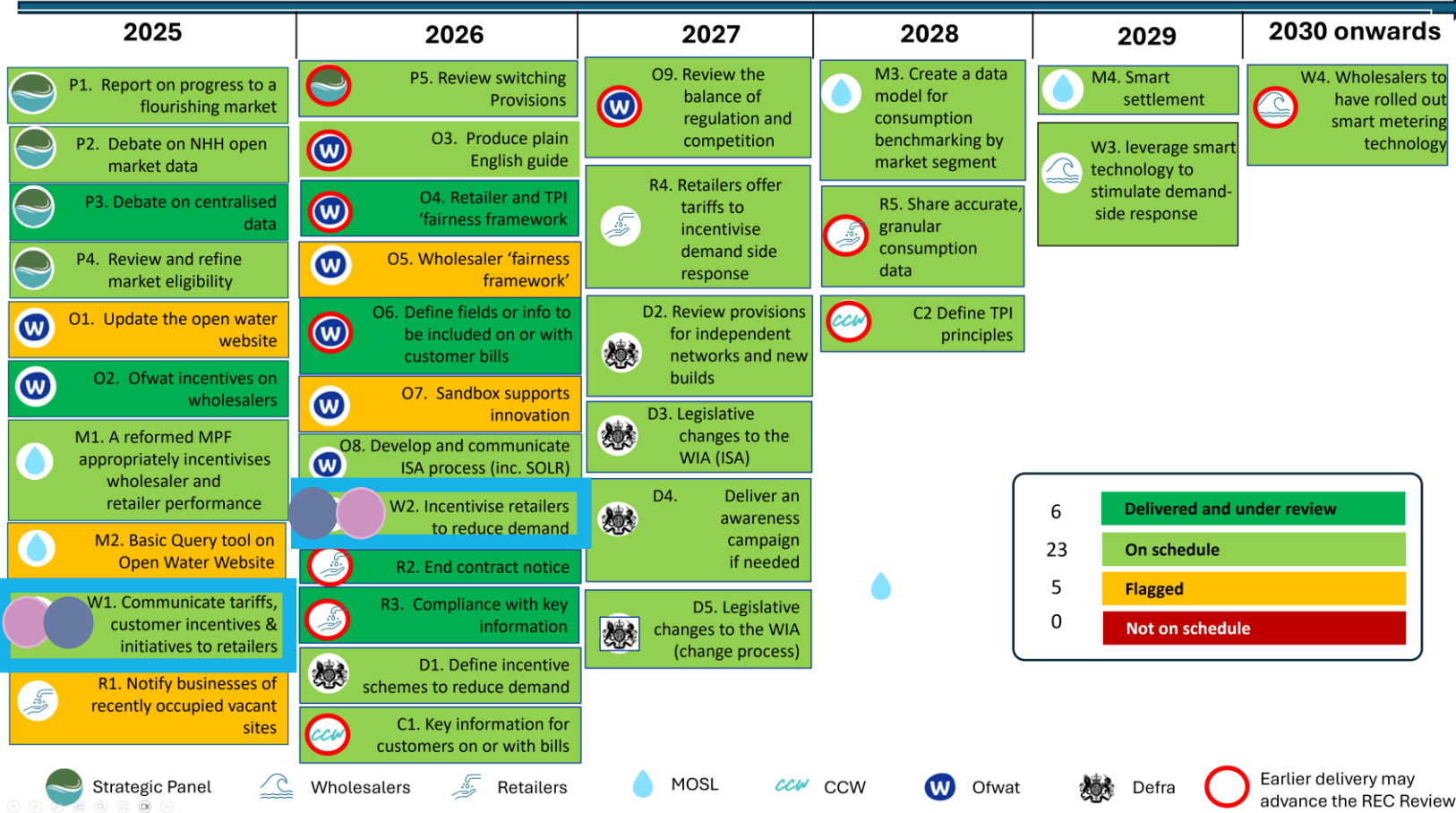


# RWG Good Practice Guides

- Review of existing good practice guides
- Publication of [wholesaler self-assessed adherence to RWG good practice guides](#) – published 29 October
- Request for retailers to complete self-assessment – Q3-Q4 2025-26



# Strategic Panel Links



## RWG Active Sub-groups

- Access
- Bilaterals
- Customer Contact Details
- Drought
- Policies
- Planned and Unplanned Events
- Settlement
- Skip Codes
- Smart Meter Rollout
- Water Efficiency
- Wholesale Tariff Simplification

# RWG In-person meeting

**When:** 28<sup>th</sup> January 2026 (10am-4pm)

**Where:** Covent Garden Suite, De Vere Grand  
Connaught Rooms – London

A registration email was published on 3 November.  
Alternatively, please contact [RWG@mosl.co.uk](mailto:RWG@mosl.co.uk) to  
sign up



# How can you get involved?

A great opportunity to play an active role in shaping activities that will support the development of the business retail market for customers and trading parties:

- Join a sub-group
- Suggest an idea for a sub-group
- Become the next Retailer Vice Chair!
- To find out more about RWG please email [rwg@mosl.co.uk](mailto:rwg@mosl.co.uk) or visit the [RWG webpage](#)
- Sign up to receive RWG emails, read Market Focus, engage with us on social media.





**RWIG**

# State of the Market report & Business Customer Insight Survey – Key findings

November 2025  
Sarah Lafond

ofwat

## Introduction – Business Retail Market update

- As in previous years, Ofwat in October published its annual:

[State of the Market update 2024-25](#)

- This year we also conducted, in collaboration with CCW, customer research:

[Customer Insight Survey 2025](#)

- Noting that this research is new and may influence opinions regarding our review of REC price caps, we are also inviting views:

[Consultation regarding State of the Market and customer research](#)

Views are invited by Monday 8<sup>th</sup> December 2025.

Today I will briefly summarise our key findings and next steps, including for our review of REC protections.



# Customer Insight Survey 2025- Background

Ofwat and CCW jointly commissioned DJS Research to undertake **customer research** with the overarching aim to **understanding business customers' views of the water retail market**. In total:

- **1781 businesses** completed the **survey online** between 7th-31st July 2025
- **30 calls** were conducted to collect additional qualitative information

For the first time this year we collected data on business annual water consumption.

## Key differences in the 2025 survey compared to previous years included:

- **Survey Method:** Conducted online for the first time (previously via telephone interviews).
- **Sampling Data:** Customer data was provided directly by water retailers, rather than purchased from sample providers.
- **Sampling Approach:** Shifted from quota sampling to random sampling.
- **Additional Research:** Included **30** in-depth interviews with participating businesses to explore their understanding and experience of the water retail market.

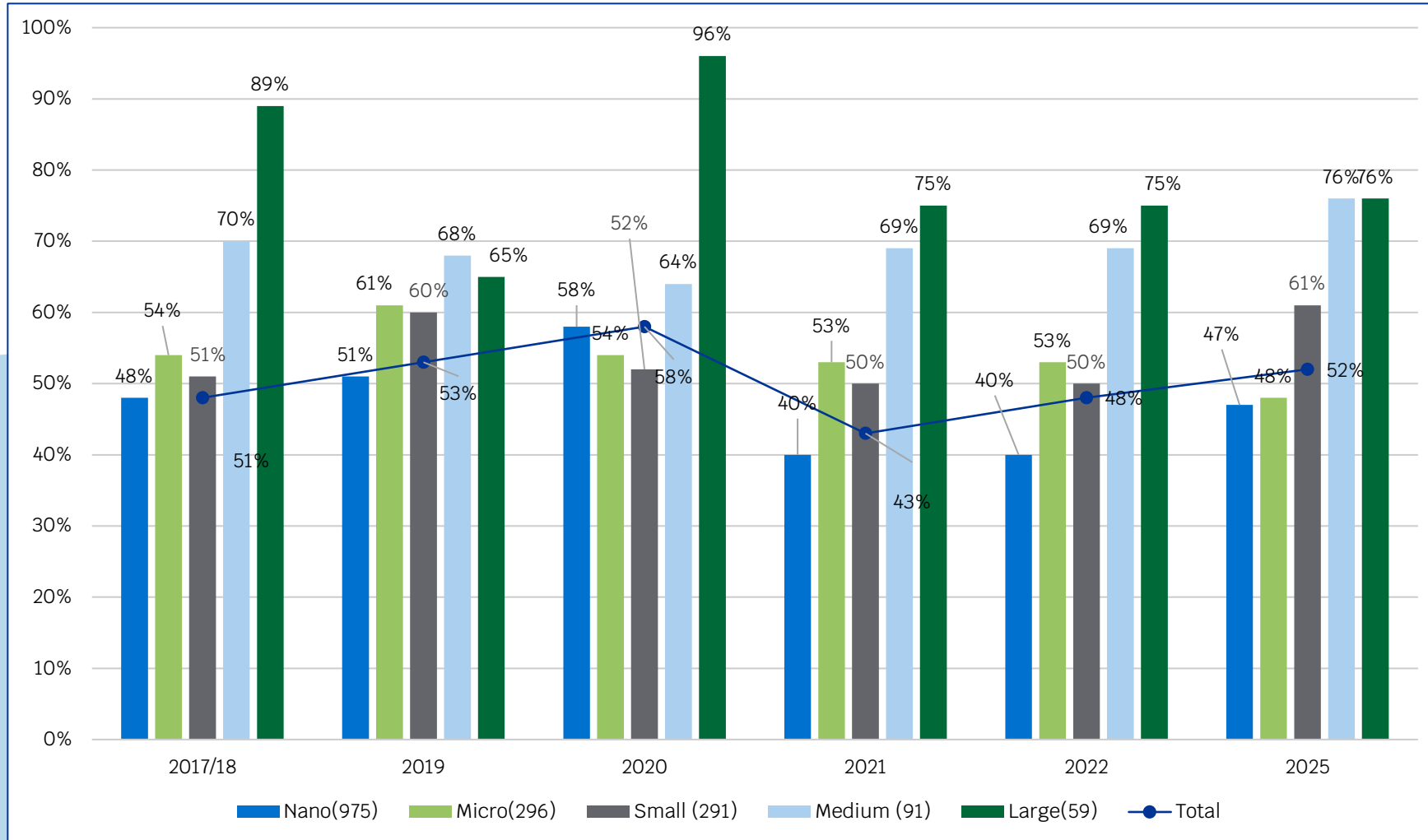
## This new approach resulted in:

- ✓ **Faster Fieldwork completion :** This new approach enabled quicker identification of business eligible as the sample was provided by water retailers and we completed our fieldwork in 3 weeks.
- ✓ **Improved baseline data:** By collecting customer information directly from water retailers we were able to gather more baseline information including level of water consumption.
- ✓ **Larger sample size:** with 1781 survey completed compared to 500 in 2022.

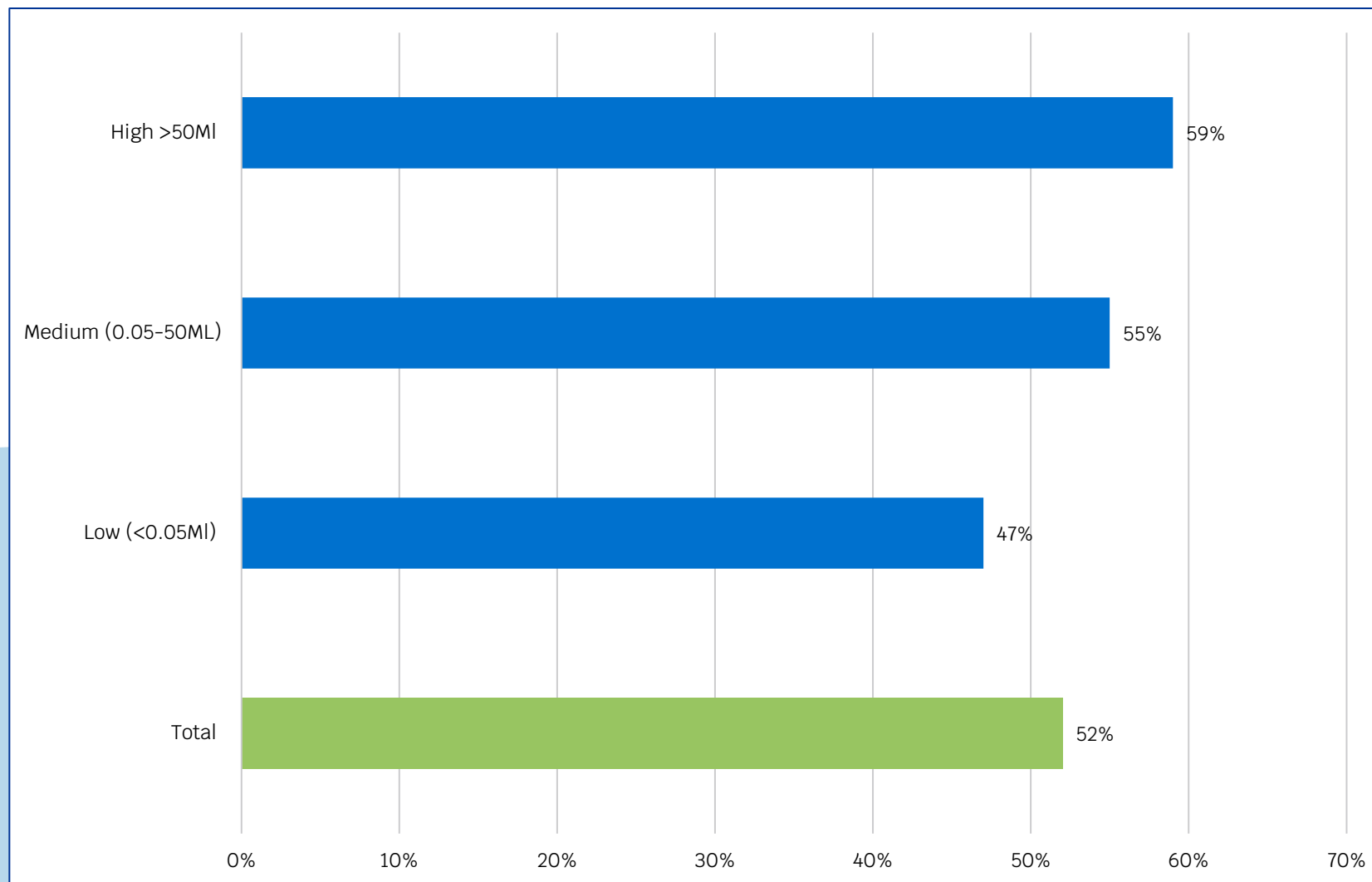


## Level of Awareness varies significantly by business size

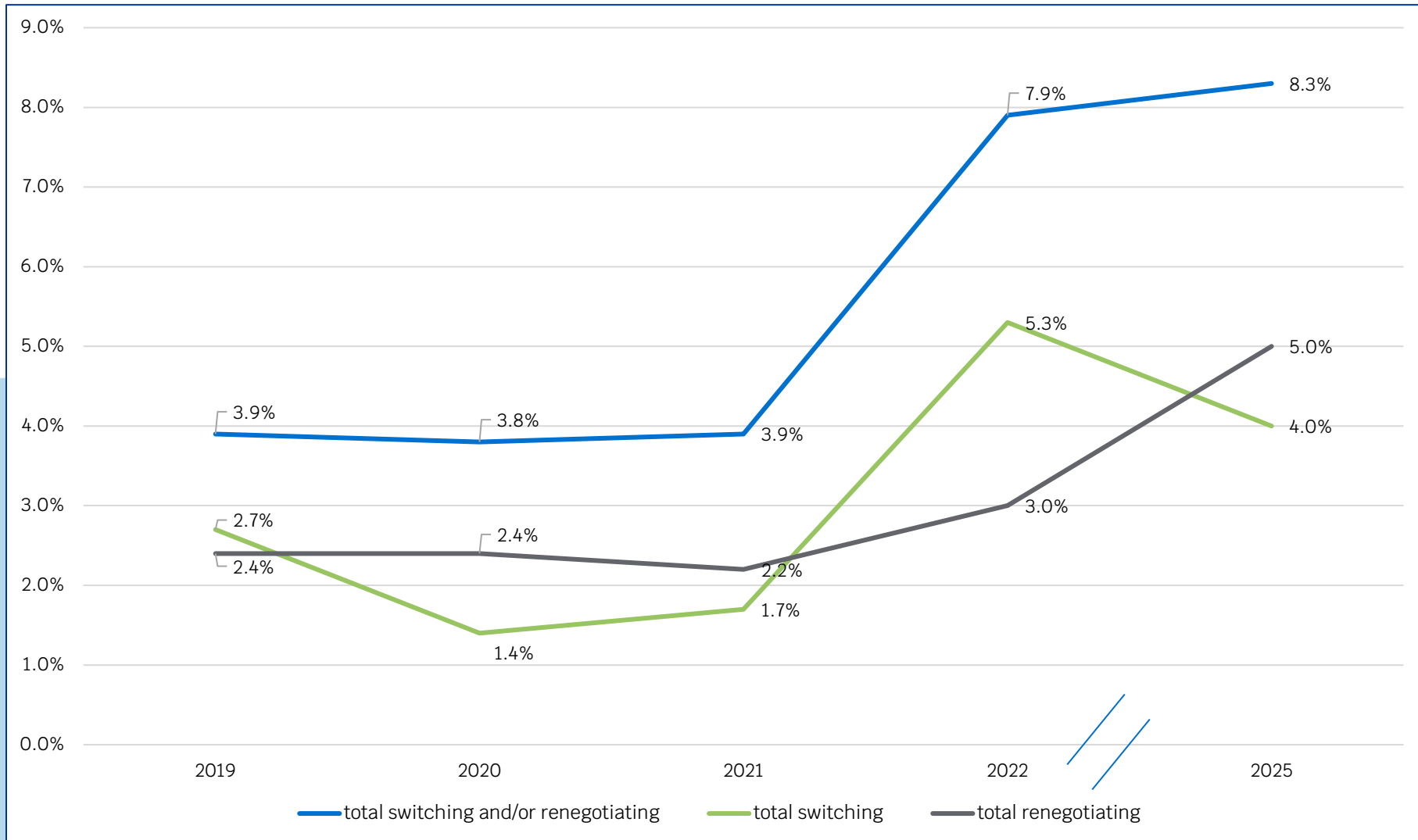
**Market awareness rose to 52% in 2025**, up from 43% in 2021. Large businesses had the highest awareness (76%), while nano businesses had the lowest (47%).



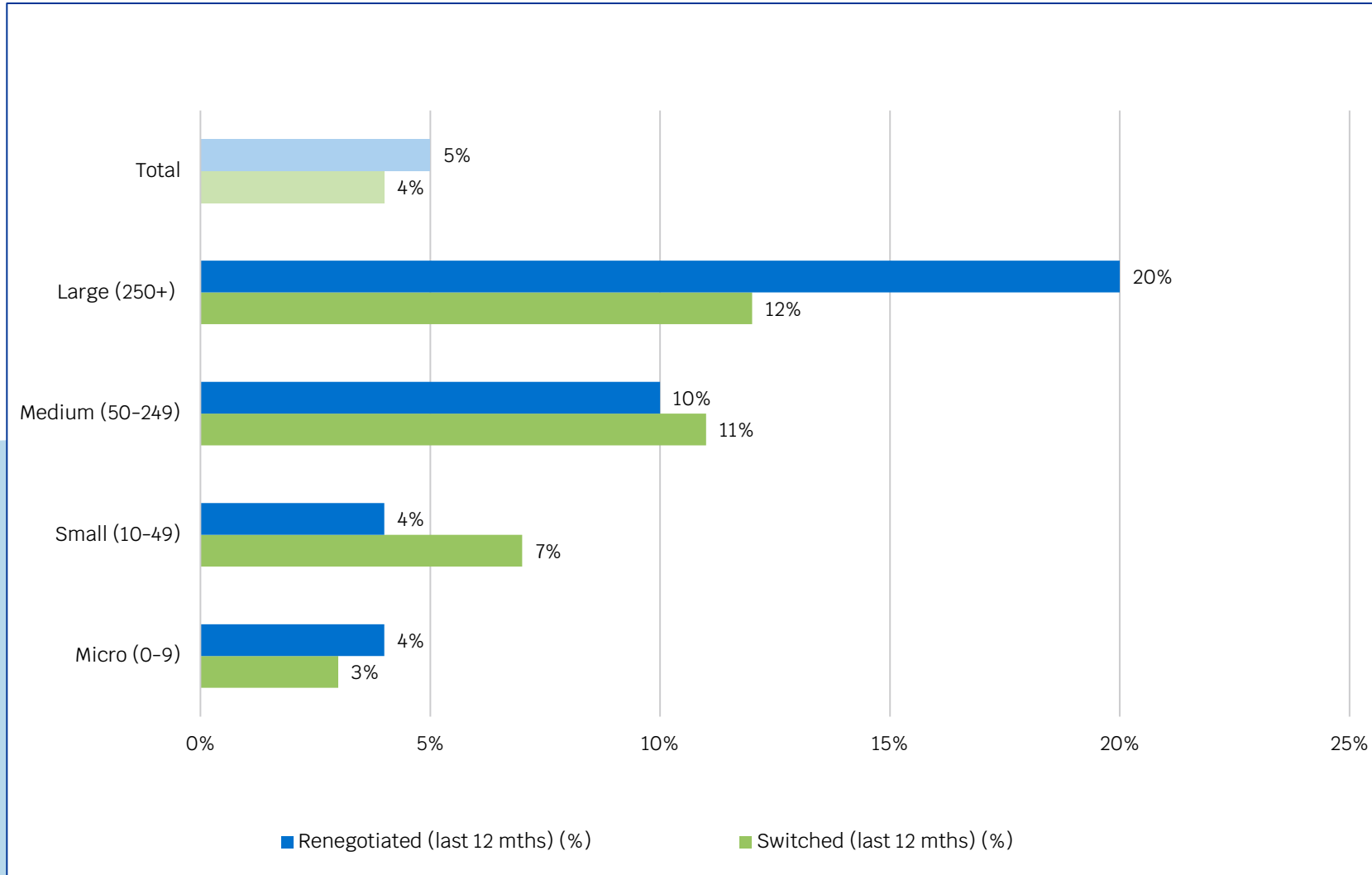
# Awareness by consumption level



# Switching and renegotiation activity has remained steady at around 8% over the past five years

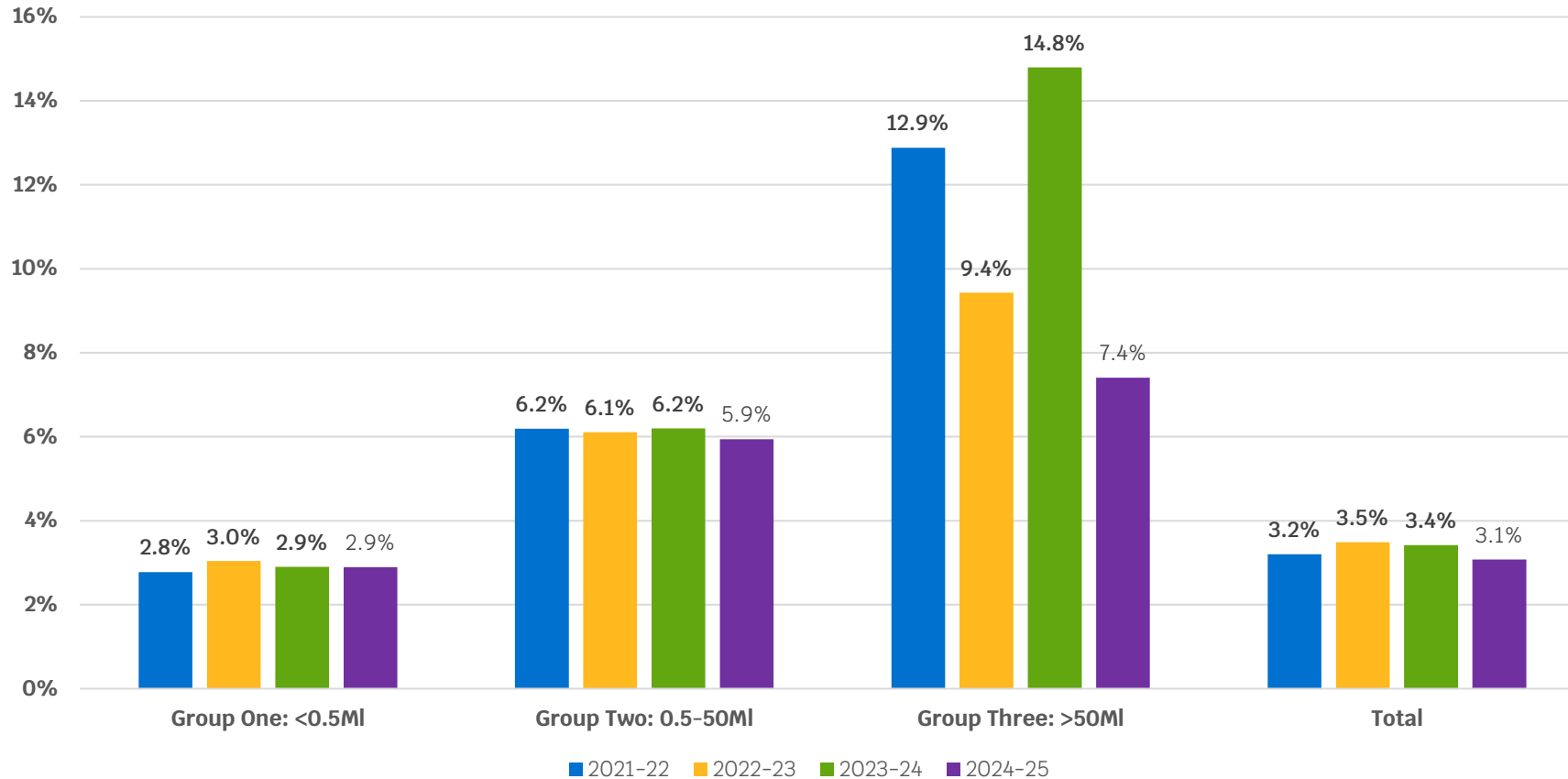


# Switching and renegotiating in the market by business size



# MOSL switching data also show less pronounced difference by consumption level this year and lower switching rate for medium and large consumers compared to previous year

SPID switching rate by annual consumption banding

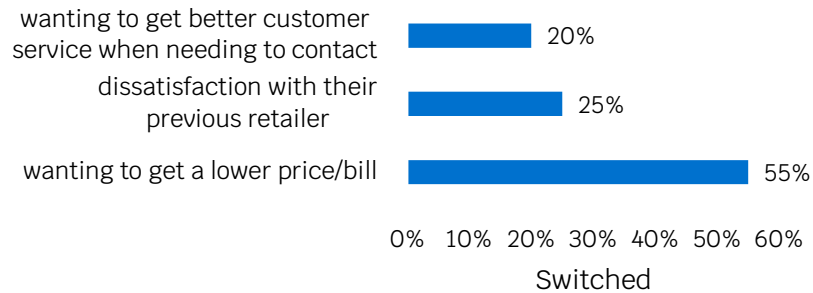


NB: Anova test perform on volume of water switched shows no stat difference between 3 groups ( $p=0.6$ )

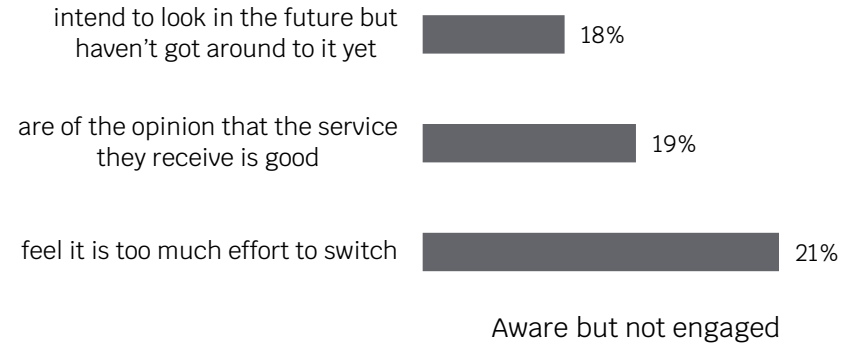


# For most businesses cost savings are the primary driver of looking to switch or renegotiate

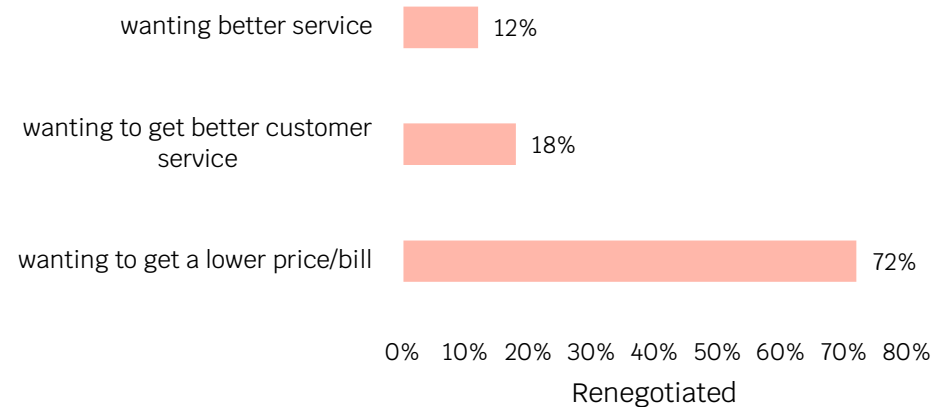
## Top 3 reasons for switching



## For those aware but not engage, there is not one single reason for remaining inactive in the market



## Top 3 reasons for renegotiating



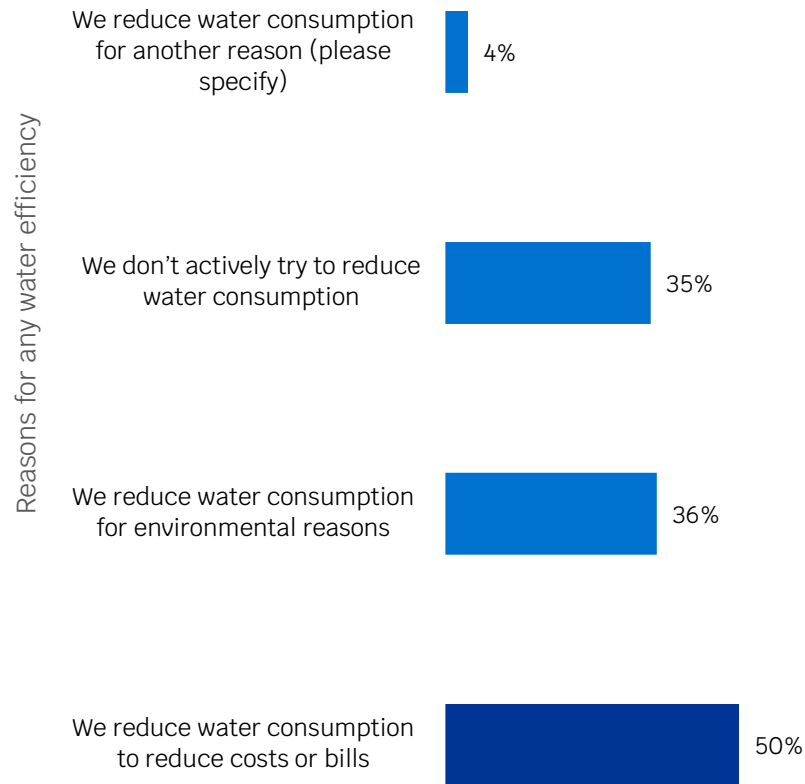
## Other key points:

- For all but the largest business consumers the savings are often considered too low to consider regularly engaging with or monitoring the market
- **68%** of businesses who have switched in the past 12 months agree (net) that it was worthwhile for them to switch
- **63%** of those who switched found switching easy

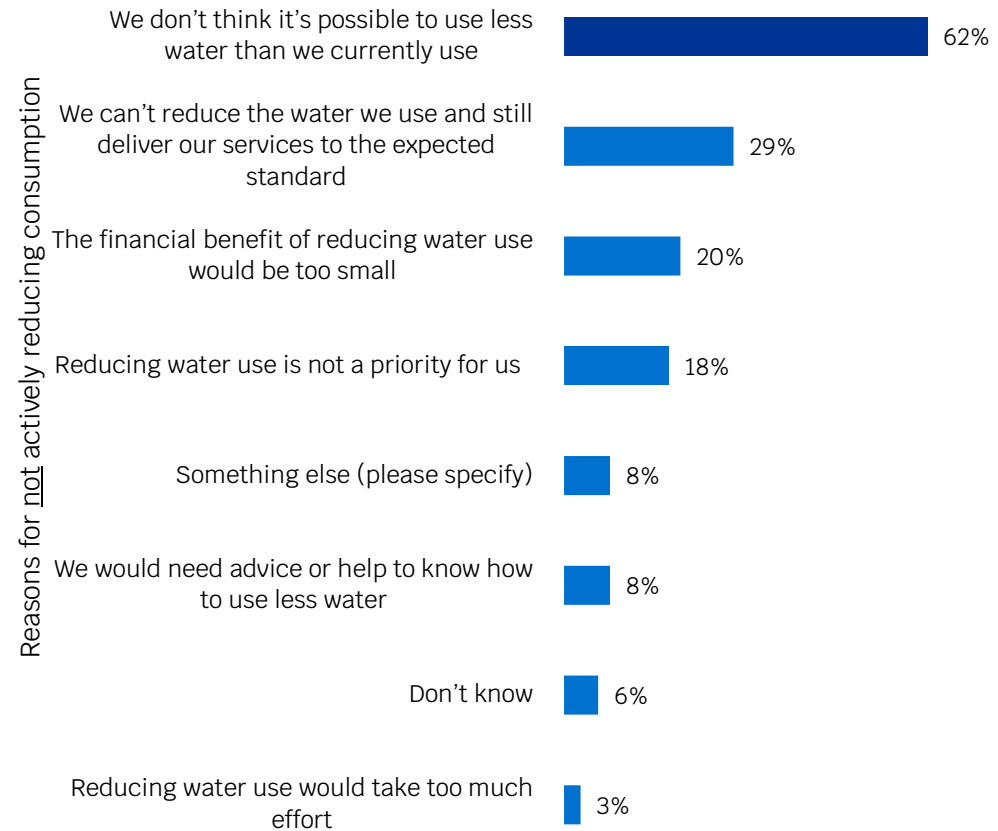


# Water efficiency is mentioned as important by 31% of businesses

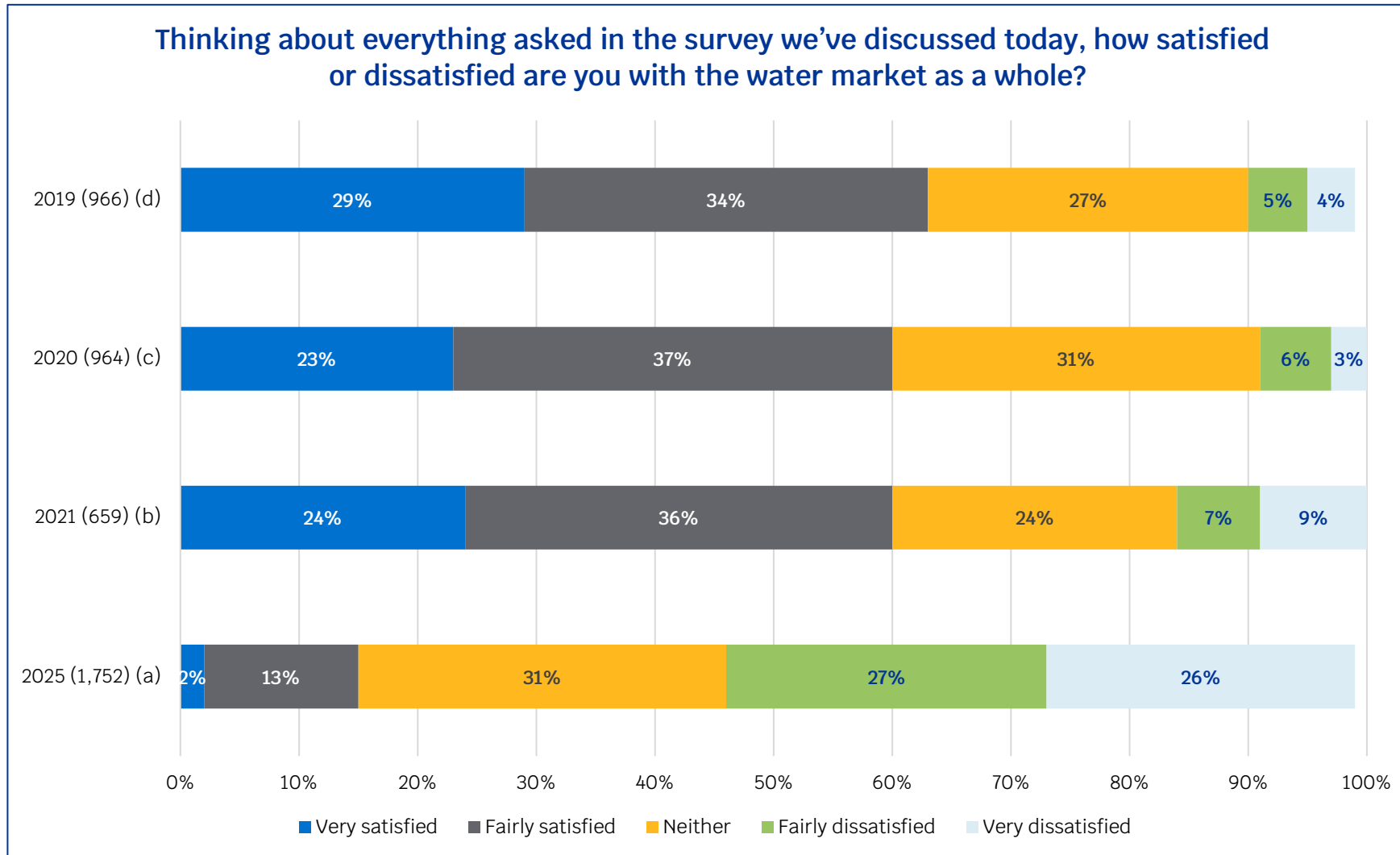
## Around half of business say they reduce water for cost reasons



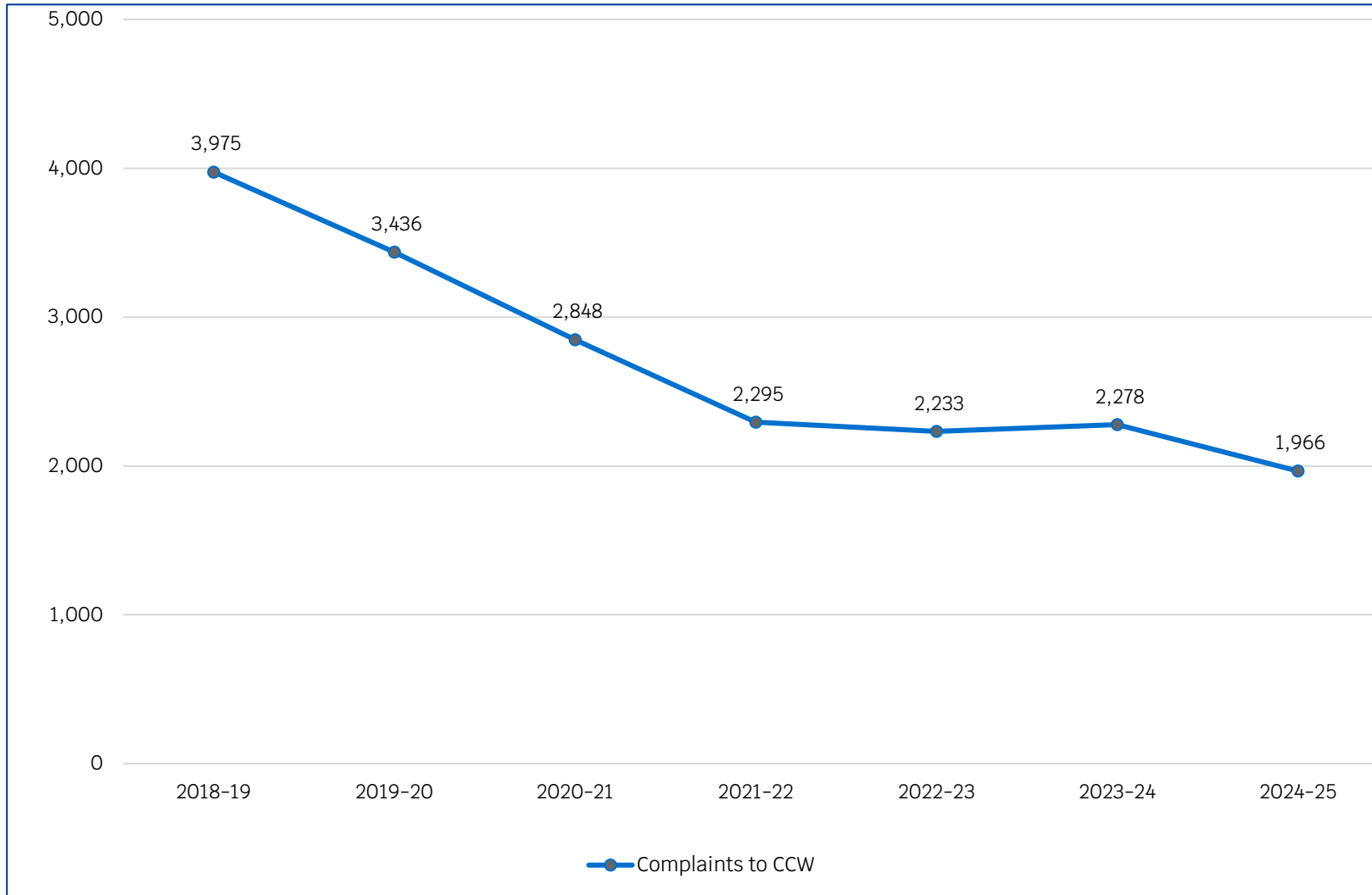
## Over a third (35%) say their business doesn't actively try to save water, with the key reason being they don't feel consumption can be lowered any further (62%).



# Satisfaction with the market fell significantly



# Number of complaints continue to fall



# Key Programmes & Updates for 2025–26

## Formation of new regulator:

Following the publication of the Independent Water Commission final report, the UK government has set out a new direction for the water sector with its indications that it will follow recommendations for the formation of a new regulator in England. This marks an opportunity to reset the sector, so it delivers better outcomes for customers and the environment.

Ofwat, and in accordance with legislation being worked up, Ofwat will work with the government and other regulators to form this new body in England, combining Ofwat with the Drinking Water Inspectorate and including elements of the Environment Agency and Natural England. We will also continue to engage with the Welsh Government and contribute to discussions on the options for Wales.

Until these new arrangements are in place, we will keep working hard to drive water companies to improve performance and deliver maximum value for customers, communities, and the environment.

## Key priority for Business retail

**Retail Exit Code (REC) Review:** Price and non-price protections apply to smaller business customers (<50Ml per year) in the business retail market. The Retail Exit Code (REC) requires Retailers to cap retail prices at wholesale charges plus prescribed retail cost and net margin allowances. We last reviewed these in 2022 and current protections came into force April 2023. We are now looking to review these with a view to any revised protections taking effect from April 2027.

**Principal aim:** revise REC protections consistent with our statutory duty to protect the interests of current and future customers, wherever appropriate by promoting effective competition



# Progress to date and next steps



## Follow up consultation now open

We are seeking views and evidence from all interested stakeholders on the following consultation questions:

**Consultation question 1:** In light of the new evidence presented in the *State of the Market 2024/25* report and the *Business Customer Insight 2025*, have your views changed in any way since responding to our July consultation? If so, please explain what has changed and why.

**Consultation question 2:** To what extent, if any, do you believe the new evidence should influence the scope of price and non-price protections? If so, please provide details on how it should do so and explain why?

**Deadline:** December 8<sup>th</sup>



# Code Changes

**Tom Daborn**  
**MOSL**

12 November 2025



# Change Proposals/Reports to table at CCC in next 3 months\* (Part 1 of 3)



Title	Summary	Stage
<b>November 2025</b>		
MO Admin of Ministry Funds (CPM066)	MOSL to convene and administer funds for Ministry of Housing, Communities and Local Government pilot to incentive more efficient water use in Cambridge	Acceptance
MO Admin of Authority Funds (CPM065)	Extend the Market Operator scope to administer the PR24 Innovation Fund and Water Efficiency Fund	Recommend
Code Alignment with 2025 GSS changes (CPW166)	Aligning market codes to changes in Guaranteed Standards of Services in Jul and Oct 2025	Acceptance
Bilateral Hub GSS Payment Notifications (CPW167)	Update the GSS payment notifications in the Bilateral Hub to reflect 2025 changes and mandate use of the Bilateral Hub to communicate about GSS payments	Acceptance
Cyclic Read Skip Codes (CPW162)	Collate standardised reasons for missing cyclic meter reads in CMOS to support resolution of meter reading issues	Re-plan



\*As of 12 November 2025

Dates for changes with PIP references are estimated.

# Change Proposals/Reports to table at CCC in next 3 months\* (Part 2 of 3)



Title	Summary	Stage
<b>December 2025</b>		
Change Process Improvements II (PIP247)	Amendments to the Initial Acceptance Criteria of the Code Change Process	Acceptance
Estimated Transfer Reads (CPW159)	Clarify when an estimated transfer read can be used in place of an actual read by a retailer or customer	Recommend
MO Admin of Ministry Funds (CPM066)	MOSL to convene and administer funds for Ministry of Housing, Communities and Local Government pilot to incentive more efficient water use in Cambridge	Recommend



\* As of 12 November 2025

Dates for changes with PIP references are estimated.

# Change Proposals/Reports to table at CCC in next 3 months\* (Part 3 of 3)

Title	Summary	Stage
<b>January 2026</b>		
Primary Charges for Sites that Cannot be Disconnected (PIP249)	Mechanism for pausing wholesale charges where a customer cannot be disconnected for non-payment.	Acceptance
Customer Contact Operational Contact Details (PIP235)	Central storage of customer operational contact details for incidents	Acceptance
<b>February 2026</b>		
Cyclic Read Skip Codes (CPW162)	Collate standardised reasons for missing cyclic meter reads in CMOS to support resolution of meter reading issues	Recommend



\* As of 12 November 2025

Dates for changes with PIP references are estimated.

# Trading Party requests in next 3 months

Title	Engagement type	Date
MO Admin of Ministry Funds (CPM066)	Objection Window	11-21 November
Cyclic Read Skip Codes (CPW162)	Consultation	12-28 November
Code Alignment with 2025 GSS Changes (CPW166)	Consultation	1-19 December
Bilateral Hub GSS Payment Notifications (CPW167)	Consultation	1-19 December
CMOS Data Retention Beyond Seven Years (CPW157)	Consultation	4 December 25 – 29 January 26**

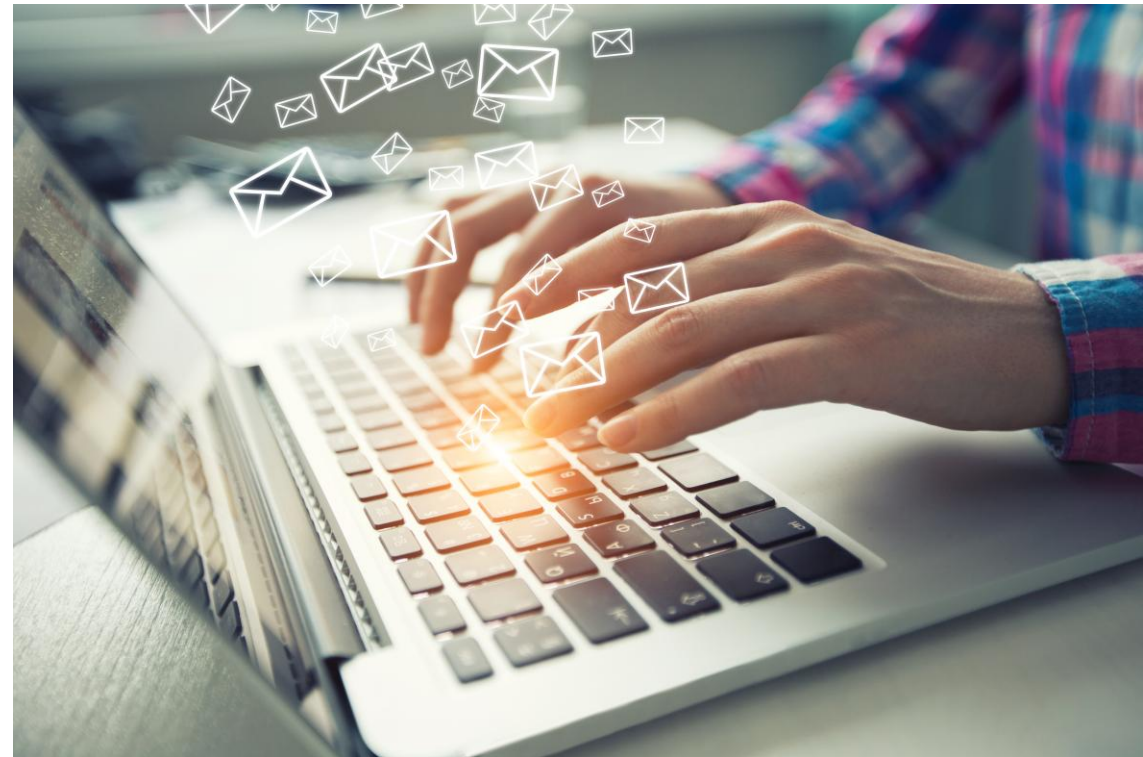


\*As of 12 November 2025

Dates for changes with PIP references are estimated \*\* Dates TBC

# Awaiting Ofwat Decision\* (1/2)

Title	CCC Recommendation	Decision Due	Implementation
Wholesaler MPS Charge Discontinuation (CPM062 & CPW160)	Early Rejection	N/A	N/A
MPF Reform Part C - KPIs Phase 1 (CPM058 & CPW149 'c1')	Unanimous recommendation	10 Nov 25	1 December 2025
Interim Supply: Cost Recovery Mechanism (CPM063 & CPW153)	Unanimous recommendation		4 weeks following Ofwat decision
Interim Supply: Initial Cost Support (CPW154)	Unanimous recommendation		3 weeks following Ofwat decision

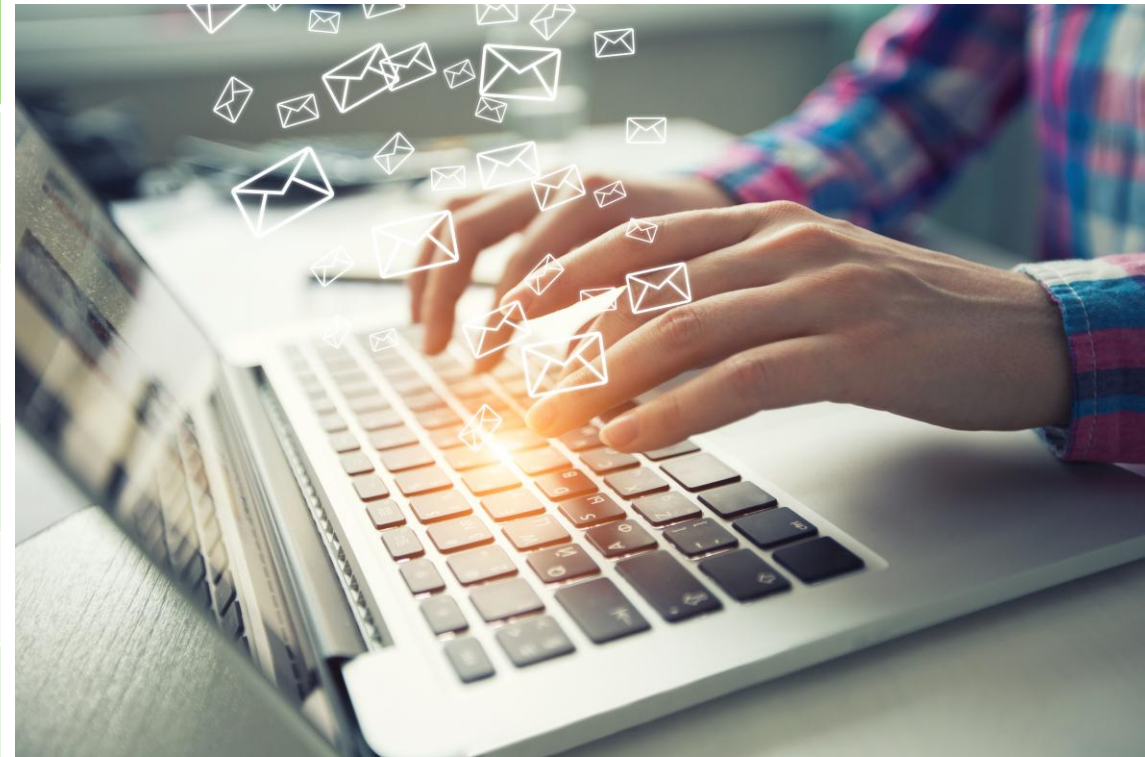


\*As of 12 November 2025

Dates for changes with PIP references are estimated

# Awaiting Ofwat Decision\* (2/2)

Title	CCC Recommendation	Decision Due	Implementation
Data/Report requests of the Market Operator (CPM061 & CPW158)	Unanimous recommendation	10 Dec 25	13 March 26
Third-party Access to Consumption Data (CPM060 & CPW156)	Majority recommendation	10 Dec 25	13 March 26
Post-RF Customer Refunds (CPW152)	Majority recommendation	24 Oct 25	10 April 26
Data Quality Assurance Flags (CPW155)	Majority recommendation	Jun 25	December 26
Deductions and Withholdings under formal Dispute Process (CPM054 & CPW145)	Unanimous Rejection One abstention	13 Feb 26	13 March 26
Third Party Requests to Wholesalers (CPW161)	Unanimous Approval	13 Feb 26	13 March 26
Smart AMI Definition (CPW163)	Unanimous Approval	7 Nov 25	1 December 25



# Implementing\*

Title	Central System Impact	Code Release Date
Bilateral Hub (Additional enhancements Pt4) (CPW139i)	Y	16 Dec 25
Bilaterals Phase 15 (CPW139i) Clarifications (CPW164)	Y	16 Dec 2025



\*As of 12 November 2025

Dates for changes with PIP references are estimated

# Implemented in Last Month\*

Title	Central System Impact	Date of Release



# Change Proposals/Reports to table at CCC in next 3 months\* (Part 3 of 3)

Title	Summary	Stage
<b>January 2026</b>		
Primary Charges for Sites that Cannot be Disconnected (PIP249)	Mechanism for pausing wholesale charges where a customer cannot be disconnected for non-payment.	Acceptance
Customer Contact Operational Contact Details (PIP235)	Central storage of customer operational contact details for incidents	Acceptance
<b>February 2026</b>		
Cyclic Read Skip Codes (CPW162)	Collate standardised reasons for missing cyclic meter reads in CMOS to support resolution of meter reading issues	Recommend



\* As of 12 November 2025

Dates for changes with PIP references are estimated.

# Providing Assurance to the market

*User Forum Update*

**Axelle Saada**  
**Market Assurance Manager**  
12 November 2025

**MOSL**



# Audit plan 2025-26



To input in the audit plan for 2026-27, please suggest an audit area by 15 December



Audit activity	Delivery update	Status
Assurance statements	First tranche received, second tranche launched in October 2025.	On time
Bilateral deferrals audit	Final findings published in August 2025	Completed
Gap sites audit	Statement of work published in June 2025, final findings to be published in January 2026	In progress
YVE audit	Statement of work published in September 2025, final findings to be published in January 2026	In progress
Quality of bilateral requests resolution audit	Statement of work to be published in November 2025, final findings to be published in March 2026	In progress
M01 exemptions audit	Statement of work to be published in February 2026, final findings to be published next financial year	Not Started

All published audit documents can be found on the [Compliance and Audit webpage](#).

# Assurance statements

- Assurance statements have been developed to provide a new way to monitor trading party compliance and track material changes to their operations.
- We have now covered 17 trading parties (English wholesalers and a handful of NAVs), we are currently out with Welsh companies, self-suppliers and the remaining NAVs.
- From the first tranche, we are following up with six trading parties to address elements of their response.
- We will send update the market on findings very soon.

# The Strategic Data Programme

**November User Forum**

12 November 2025

# Programme Team

- **Programme Sponsor** - Simon Powell
- **Product Owner and Lead** - Matt Labrum
- **Programme Manager** - Spencer Mattia
- **Project Manager** - Lisa-Ann Lott
- **Communications Lead** - Megan Riley
- **Digital Support** - Subhash Marti
- **Programme Support** - Daniel McNamara



# Working Group members

The working group is made up of the MOSL team, IDenteq, and market representatives, including four wholesalers, three retailers, and a NAV.

- **United Utilities** – Louise Rutherford (W)
- **Northumbrian Water** – Angela Brown (W)
- **Castle Water** – Jamie Davies / Rachael Donaldson (R)
- **Water Plus** – Dan Proctor / Mark Whittall (R)
- **Thames Water** – Yasmine Ali (W)
- **Wave** – Lee Wilson (R)
- **Leep Utilities** – John Gibson (N)
- **Affinity Water** (joined Oct 25) – Bernard Bradshaw (W)

# What is the SDP?

**The Strategic Data Programme (SDP) aims to find and fix the root causes of poor-quality premises, address, and customer data being entered into CMOS.**

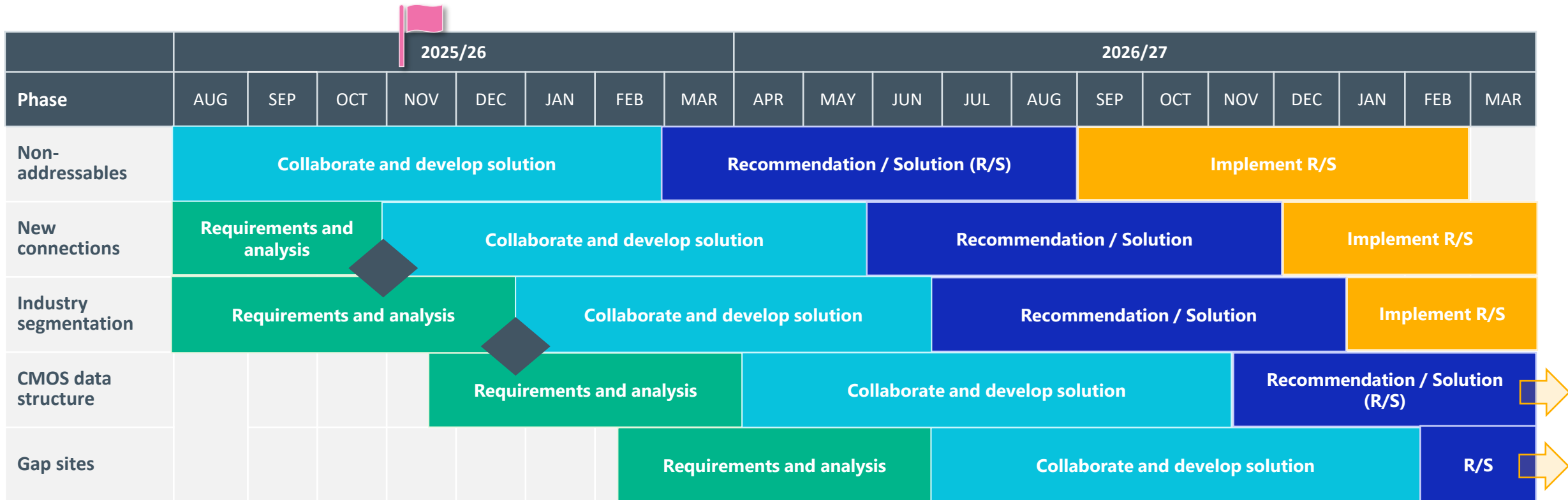
- The SDP can be thought of as the prequel to the Data Assurance Service, which worked with trading parties to improve the quality of data that was already held in CMOS.
- MOSL, the working group, and IDenteq are reviewing the current market processes, systems, and codes to ensure they are fit for purpose.
- There are five key deliverables, and the programme is currently projected to take two years.

# Programme deliverables

- 1** Non-addressable premises
- 2** New connections process
- 3** Industry segmentation
- 4** CMOS data fields
- 5** Gap sites



# Moving programme plan



# How does it work?

- 💧 We hold working group sessions every three weeks.
- 💧 The initial meetings are to review the requirements of each programme deliverable to understand what the challenges are from varying market perspectives. In later meetings, we begin to develop solutions to the challenges we've identified.
- 💧 The first five working group meetings primarily revolved around **non-addressables**. The sixth saw the kick-off of phase 2, the **new connections** process.

# Non-addressable supply points

A non-addressable is any address pointing to a location that is not considered suitable for postal delivery and therefore cannot be billed directly.\*

Fire hydrants



Troughs



Construction site cabins



Allotment standpipes



Public park toilets and fountains



Cemetery taps



\*Definition agreed by the working group in WG1 on 7 August 2025.

# Non-addressable premises



“Non-addressable premises” refers to supply points without a standard postal address.

**Without a standard postal address, the following issues arise:**

- Difficulty determining data accuracy
- A lack of insight and clarity around these sites
- Challenges in determining eligibility status
- Potential for lost revenue

**Initial proposed objectives:**

1. Categorise non-addressables and assess market eligibility
2. Discuss eligibility status of categorised non-addressables
3. Determine for each category what the end billable customer will be, i.e. Public Convenience (Local Authority)
4. For eligible non-addressables, and based on the findings of 1 & 3, determine what data is required to maintain SPID data and track

# Key outcomes so far

**1**

We agreed and finalised the four key workstreams for non-addressables

**2**

We confirmed the definition of a non-addressable

**3**

We categorised non-addressables

**4**

We agreed the best way to identify a non-addressable is scanning full addresses for a defined list of key words, which is being updated based on feedback and will be shared with TPs (*see example on next page*)

**5**

We have a prospective code change for UPRN and VOA Exemption reason codes

# Categorisation and key words

3

We categorised non-addressables

4

We agreed the best way to identify a non-addressable is scanning full addresses for a defined list of key words, which is being updated based on feedback and will be shared with TPs

Categories
Advertising
Agricultural
Communal Supply
Garage
Inactive
Land
Leisure
Non Delivery Point
Parking
Telecoms
Temporary Premises
Toilets
Water Supply
Other

Categories	Key Words
Agricultural	CDT
	COMMUNAL OUTDOOR SUPPLY
	COMPOUND SUPPLY
	FARM SUPPLY
	SUPPLY
	TRGH
	TROUGH
	TROUGHS
	UNCONFIRMED SUPPLY
	YARD SUPPLY

# New connections process



New connections refers to the process by which new supply points are registered into the market. Under the current process, registration is required before associated address data is fully formed, meaning incomplete data enters CMOS.

## **Retailers and wholesalers have reported the following issues:**

- Challenges in billing developers during the build phase
- Difficulty determining the eligibility status of completed premises
- Difficulty tracking tacking data quality and visibility of premises

## **Proposed objectives:**

- Categorise new connection types
- Consider external services and databases to ensure optimal data is entered at registration and the premises are adequately tracked through the lifecycle of development
- Review code and trading party obligations
- Review recommendations from the Market Improvement Fund Project NAPS, led by IDenteq

# Next Steps

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The next working group meeting will be Thursday 27 November.

Over the course of the next few months, we will be collaborating with the working group to find solutions to challenges or inefficiencies in the new connections process.



# Questions?



# Eligibility challenges

*Inconsistencies and next steps for the approach to eligibility in the business water retail market*

**Markus Lloyd**  
**Market Improvement**  
Aug 2025

# Problem statements

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1. The market does not have a definition of eligibility for the market that is clear and unambiguous
2. Trading parties do not have a standard process for removing ineligible premises from the market that presents a code compliant way of reconciling monies owed across parties (customers, retailers and wholesalers)
  - This is complicated by the fact that retailers have the responsibility for identifying household premises but wholesalers have the responsibility for initiating the de-registration

## Desired conditions

At the end of the Eligibility Programme the following should be true:

1. There is no ambiguity around whether a premises should be in the business retail market or household market. The definition will be agreed by all market participants, including the regulator.
2. Business customers do not receive household / consumer bills for their premises
3. Wholesalers and retailers have a clear process, which is consistent across regions, to follow when removing a premises from the business retail market
4. Retailers are not at risk of financial disadvantage when a billing customer exits the market

# MOSL's proposed approach



MOSL has been exploring the current challenges and causes behind eligibility issues and the de-registration process before updating its Eligibility Guidance document.

MOSL will ask the User Forum for views before submitting a draft Guidance document to Retailer Wholesaler Group (RWG) before publication.

MOSL will draft code changes in line with improvements identified within the Guidance.

This will support the Strategic Panel in the completion of their Roadmap action P4: Review and refine market eligibility

## Code

- [WIA](#) The Water Industry Act is the legislative foundation for eligibility and Section 17C states that premises are **household** if the “principal use is as a home.” A premises must not be household to be eligible for the business retail market
- [CSD 0105](#) Code Subsidiary Document 0105 Section 6.2.33 onwards allows for retrospective corrections to be made where data errors (such as misclassification) have occurred. This includes creating an independent record with the correct classification and amending the market data accordingly
- [WRC \(Part 1 – Objectives\)](#) states that if the principal use is a home, then the premises is not eligible for the BRM. By definition, an eligible premises is not one whose principal use is a home.
- [WRC \(Part 3 Operational Terms\)](#). Describes how to register an eligible premises
- [WRC \(Part 4 – Market Terms\)](#) Wholesale Retail Contract Section 4.8.2 confirms that a supply point should be deregistered in circumstances where it has been incorrectly registered (e.g. where there has been a change in circumstances such as an Exit Change of Use).”
- The [CPCoP](#) (Jul 25) Customer Protection Code of Practice states that if a misclassification led to incorrect billing, and a correction results in the Wholesaler refunding charges to the Retailer, then, in **Section 9.3.3** the Retailer is *obliged* to pass this refund on to affected customers “in the same proportion to which the recalculation has affected their invoices or bill”

## Guidance

- Ofwat’s [Revised Eligibility Guidance 2022](#) provides Ofwat’s interpretation of what constitutes an “eligible premises” under the Water Industry Act 1991. Section A of Part A clarifies that it is the **retailer’s responsibility** to assess eligibility. It includes examples of when a change in principal use (e.g. becoming a home) would disqualify a premises from the non-household market
- MOSL’s [Market Eligibility Assurance Review good practice guide](#) (Nov 23). This is the same document that is sometimes referred to as Data Assurance Best Practice Guide v1.1 (Nov 2023). It reinforces the importance of data accuracy and fairness and advises in section 3.1 that **SPERR should not be used** for eligibility-related deregistration, and that customer communication and proper records are essential. The effective date of the deregistration should be from the date of notification.
- MOSL’s [Eligibility Assurance Process Specification](#) (June 2025) details the MOSL-led process for assessing and deregistering non-eligible premises. It provides clear procedures for joint wholesaler-retailer agreement on non-eligibility and step-by-step instructions for Process C5 deregistration.

# Stakeholders

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External (currently engaged)

Name	Team	Focus
Trisha McAuley	Panel Roadmap Subset	Panel Action/ Roadmap
Rick Hill	Panel Roadmap Subset	Panel Action/ Roadmap
James Cleave	Panel Roadmap Subset	Panel Action/ Roadmap
Andrew Beaver	Panel Roadmap Subset	Panel Action/ Roadmap
Christina Blackwell	Panel Roadmap Subset	Panel Action/ Roadmap
Fallon Wilkinson	WaterPlus	Water Plus
James McKenzie	CCW	Eligibility interest

# The three elements of eligibility

## 1. What's not in that should be

Led by James McKenzie at CCW

Recognises challenges around split use

Proposes:

- a. Splitting supplies
- b. Assessing primary use
- c. Considering treatment of same premises in other regions
- d. Asking for the customer's preference

Uses: WIA, Ofwat Guidance

## 2. What is in that should not be

Led by Matt Labrum – Data Assurance

With Identeq, has created:

- a. Identification of ineligible premises
- b. Categories of confidence
- c. A bilateral exit process
- d. A performance metric

Uses: MOSL's Good Practice Guide and MOSL's [Eligibility Assurance Process Specification](#) in accordance with WRC

## 3. How to remove findings from Element 2

Led by Charles Unvala and Hannah Allardice. With Fallon Wilkinson (Water Plus)

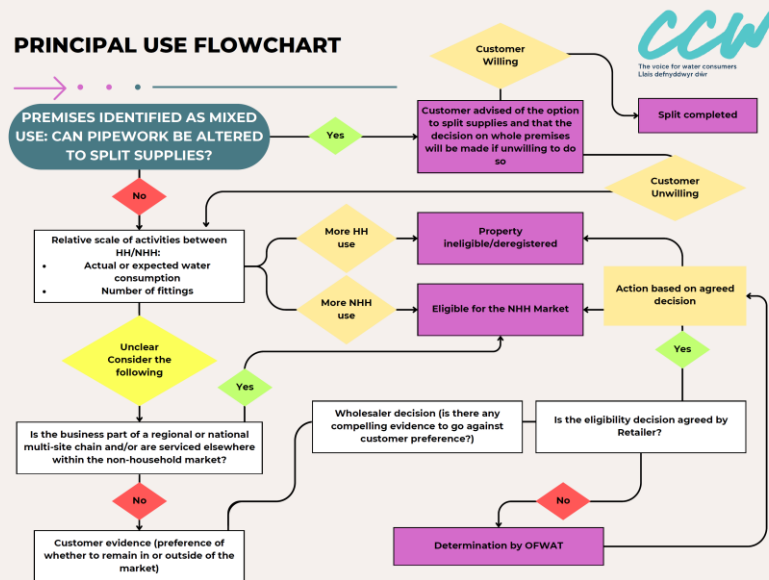
Considers:

- a. How to record when the customer ceased occupancy and how much they have used
- b. How to record this in CMOS
- c. What the basic principles of settlement are

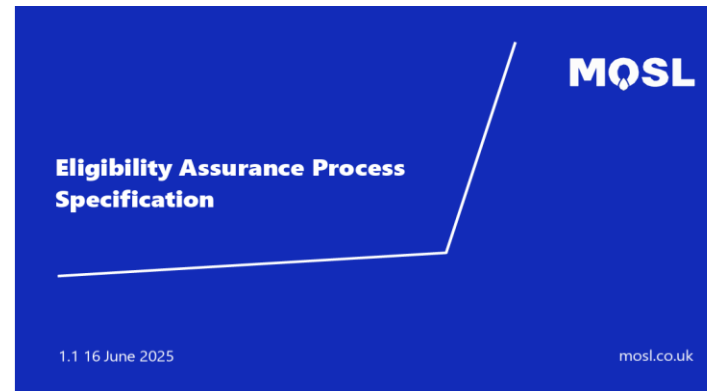
Uses: MOSL's [Eligibility Assurance Process Specification](#) in accordance with WRC

# The three elements of eligibility

## 1. What's not in that should be



## 2. What is in that should not be



## 3. How to remove findings from Element 2

### Code Subsidiary Document No. 0105: Error Rectification and Retrospective Amendments

#### Erase Supply Point

6.3.7 In accordance with the process in section 6.1, Wholesalers may submit the Data Correction version of the T115.W, TCORR115.W (Declare Disconnection/Reconnection/ Deregistration) Data Transaction to completely remove a Supply Point from ever contributing to the Primary Charge. Such a Supply Point will be deemed to be Erased. For the avoidance of doubt, a Supply Point will be deemed to be Erased when the TCORR115.W Data Transaction is submitted with the D2025 (Disconnection/Reconnection/Deregistration) Data Item value of SPERR.



# Potential outcomes

## Changes to WIA

1. The WIA presents two key statements on eligibility: retailers must not serve household customers; a “household premises” is defined as a premises whose principal use is as a home.
2. No further direction is given on the definition, and this leads to dispute between wholesalers and retailers when removing premises from the market, which Ofwat is expected to resolve.
3. A more precise definition in the WIA would be welcomed as would a review of the dispute process

## Changes to guidance

1. CCW has offered changes to guidance through its flow chart
2. Recognition of this suggestion and incorporation into Ofwat’s guidance would be welcomed
3. MOSL guidance would need updating in line with the above
4. Any code changes would need to be added to the MOSL guidance

## Changes to code

1. There is potential for a new CMOS transaction which could be used to denote a volumetric adjustment in the event of a de-registration. This would necessitate a code change and would also incur some cost to implement. This would also push the end date of this programme out to November 2026
2. Clarification around the occasions when “SPERR” should be used or when “NOSP” and “EXIT” are to be used could be codified.

# Long term debate

## Debate Changes to WIA and Ofwat Guidance

1. The Act never provides a stand-alone definition of “non-household” or “business premises.” Instead, it always phrases it in the negative: a premises is only eligible if it is *not* household premises as defined in section 17C. Should the Act contain a definition?
2. Does the proposal by CCW work?

## Debate Changes to guidance

### Backdating & Refunding

- SPERR and EXIT use
- Non billing customers
- Billing customers
- Sequence of refunding

How should disputes around the inclusion of premises be settled:

- Disputes Committee? What code has been broken?
- Ofwat? Limited resource
- TP committee?

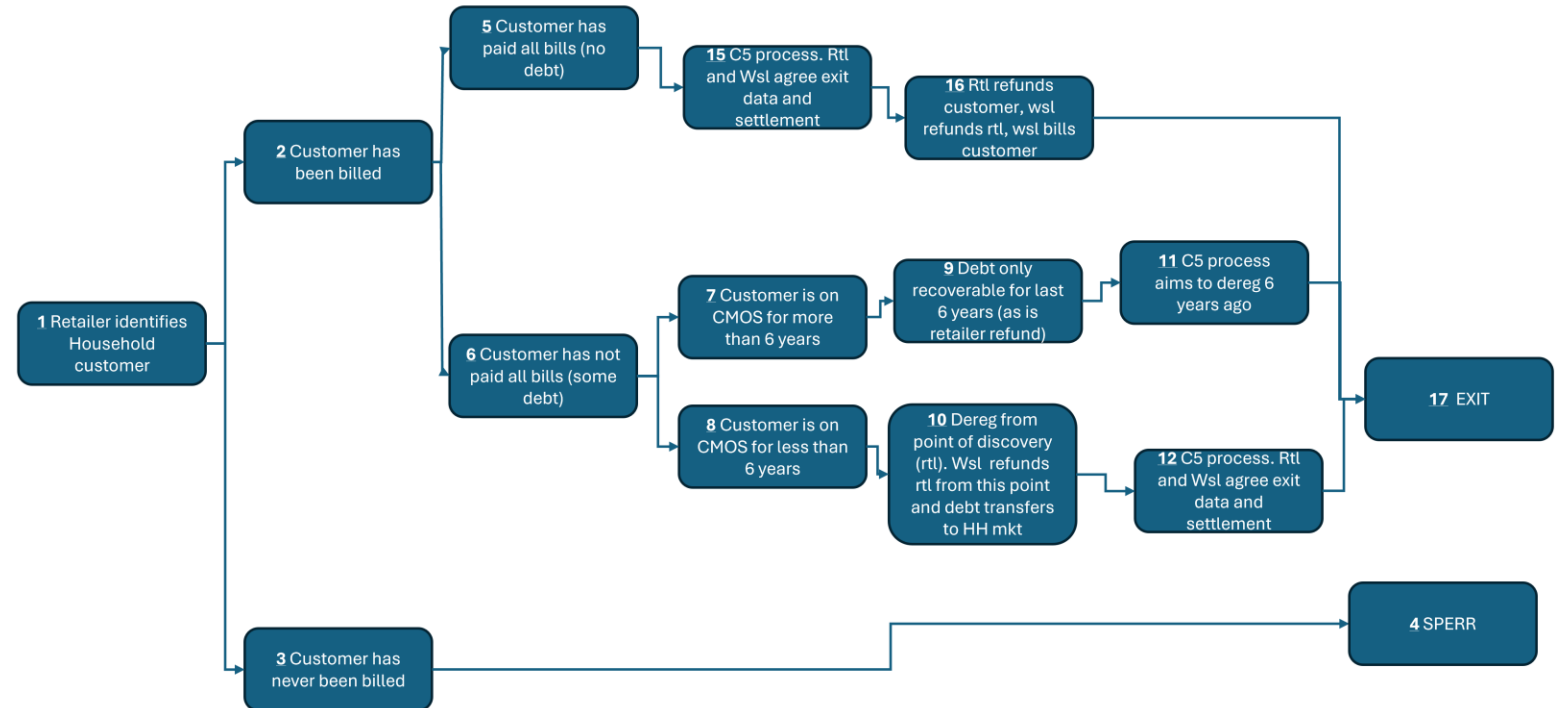
## Debate Changes to code

Would the use of a de-registration specific volume adjustment code improve the process?

Should the use of SPERR be codified to explicate prevent it being used unless the premises has always been a domestic premises and never had a bill raised against it

# Short term (UF) debate

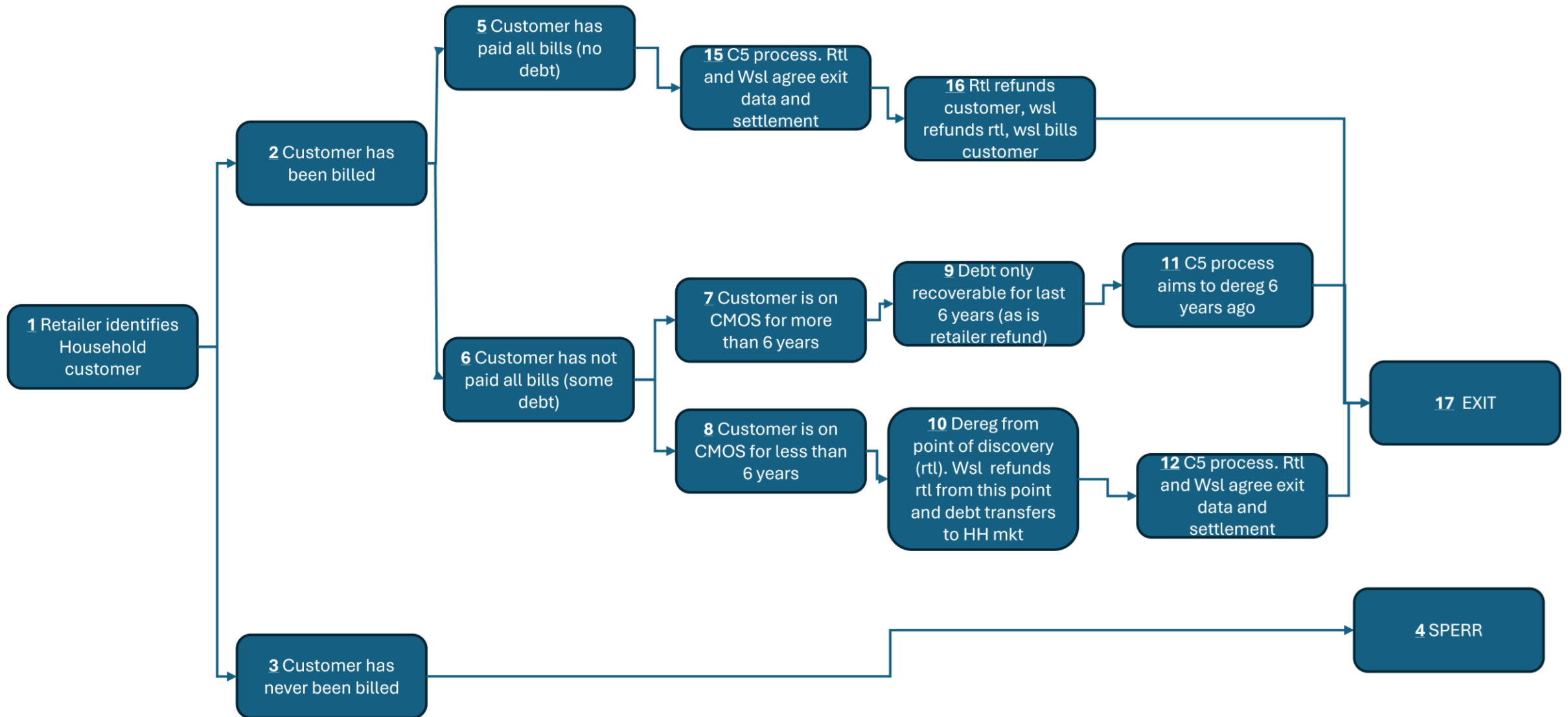
What options and solutions are missing from the diagramme



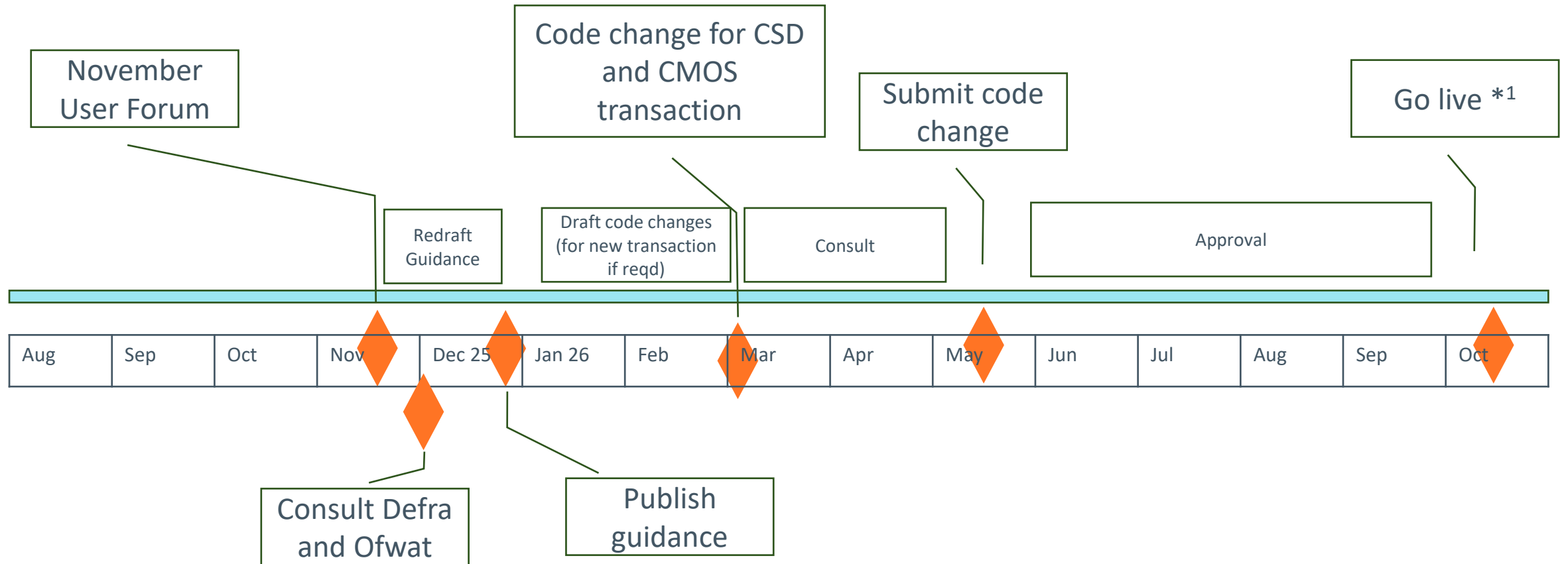
Agree process to exit the market including the concept of “codifying” outcomes 17 and 4

Consider establishing volumetric adjustment transaction on CMOS to simplify the current backdating/TCORR process that follows 15, 11 and 12

# Short term (UF) debate



# Timeline



\*1 Unless involving CMOS change ... Mar 27

# END

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MOSL

- Following slides in deck are notes etc

**MOSL**

# **AOB And Close**

