

User Forum

MOSL

Online

Hosted by
Markus Lloyd & Simon Bennett
22 November 2023



Agenda

Item	Description	Who	Time
1	Introduction	Markus Lloyd & Simon Bennett	1500–1505
2	In Person October Forum overview	Markus Lloyd	1505–1515
3	Retailer Wholesaler Group (RWG) update	Ray Porter & Mike Rathbone	1515–1525
4	Change Process	Flo Monea	1525–1535
5	Market Performance Framework (MPF) Reform consultation 3	Evan Joanette	1535–1545
6	MPF Interim Improvements CPW144	Markus Lloyd	1545–1555
7	Break		1555–1600

Agenda

Item	Description	Who	Time
8	Market Improvement Fund (MIF) Project REDUCED update Project AMIDST update Project NO FLOW update	Markus Lloyd Caroline Wadsworth Michelle Thompson Claire Stanness	1600-1635
9	SMR QuickStart project update	Simon Bennett	1635-1645
10	Forum Debate: QSP Metering, what have we missed?	All	1645-1655
11	Close	Markus Lloyd & Simon Bennett	1655-1700

Review of In-Person User Forum

User Forum

Markus Lloyd

November 2023

RWVG Updates

***Ray Porter & Mike Rathbone
Joint Chairs of RWVG
November 2023***



MOSL

Changes

Flo Monea
November 2023



Change Proposals/Reports to table at CCC in the next 3 months *



Reference	Title	Summary	Gate	CCC meeting date(s)
CPM057	Late Payment of MO charges	This change seeks to make the application of interest for the late payment Market Operator charges proportionate.	3	11/12/23
PIP182	Transfer Read Notifications for Outgoing Retailers	This change seeks to introduce notifications to Outgoing Retailers when Transfer Reads are updated or removed.	1	11/12/23
PIP176	MPF Reform Framework	Overarching MPF change	1	11/01/24
PIP186	Governance of Incentive Scheme Guidance Documents	This change seeks to relax the obligation and allow MOSL to update the documents without Ofwat approval to reflect practice through a housekeeping change/simplified process change.	1	11/01/24

Change Proposals/Reports to table at CCC in the next 3 months *



Reference	Title	Summary	Gate	CCC meeting date(s)
PIP197	Housekeeping change to Gap Site Incentive Scheme Guidance Documents	This change seeks to make clarificatory edits to explain how Retailers can gain access to the Wholesaler's duplicate register on MOSL's SharePoint.	1	11/01/24
CPM056	Resource Support to Industry Group	CPM056 seeks to allow the Market Operator to provide resources to industry groups such as the Retailer Wholesaler Group (RWG) to support them in developing solutions to improve customer outcomes.	3	11/01/24
CPW139f	Bilateral Hub (Accredited Entities)	This will deliver processes B2, B4, B6, B8, B9, I1, I6, I9 and I12 - these processes are all metering activities, disconnections and reconnections carried out by Accredited Entities. They will be renamed to J1 and J2, where J1 will be all the advance notifications of those activities/process and J2 will be the confirmation that they were completed.	3	13/02/24
PIP172	Changes To USR Process	There is currently no defined scope yet. There will be an RWG consultation to gather information from the market on the USR process and possible changes needed. This will run 27 Nov- 15 Dec.	1	13/02/24

Awaiting Ofwat Decision*



Reference	Title	CCC Recommendation	Decision Due	Implementation Date
CPW144	Market Performance Framework Interim Improvements	Unanimous recommendation	18/11/2023	18/01/24
CPM054 & CPW145	Deductions and Withholdings under Dispute Process	Majority recommendation	15/11/23	16/02/24
CPM053 & CPW146	Change Process Improvements	Unanimous recommendation	18/11/2023	18/12/23
CPM055	CMOS Data Escrow	Majority recommendation	22/11/23	16/02/24
CPW132	Credit Support and Wholesaler Credit Ratings	Unanimous recommendation	18/12/23	18/01/24
CPW147	MPS18 & 19 Clarifications	Unanimous recommendation	18/12/23	18/01/24
CPW139e	Bilateral Hub (Miscellaneous)	Unanimous recommendation	15/01/24	13/03/24
CPW141b	Clarifying Meter Chamber Responsibilities	Unanimous recommendation	24/01/24	16/02/24

*As of 15/11/2023

Awaiting Implementation*



Reference	Title	Central System Impact	Date of Release
CPW139c	Bilateral Hub (Dis/Re-connections)	N	12/12/23
CPW139d	Bilateral Hub (Assessments)	N	12/12/23
CPW145	Wholesaler Maintenance of YVEs for NMMs	Y	10/05/2024

Reference	Title	Central System Impact	Date of Release
CPW137	Interim Supply: Customer Data Provisions	N	27/10/23

MIPF Reform

*Evan Joanette
November 2023*



MPF Reform Consultation 3: stakeholder responses

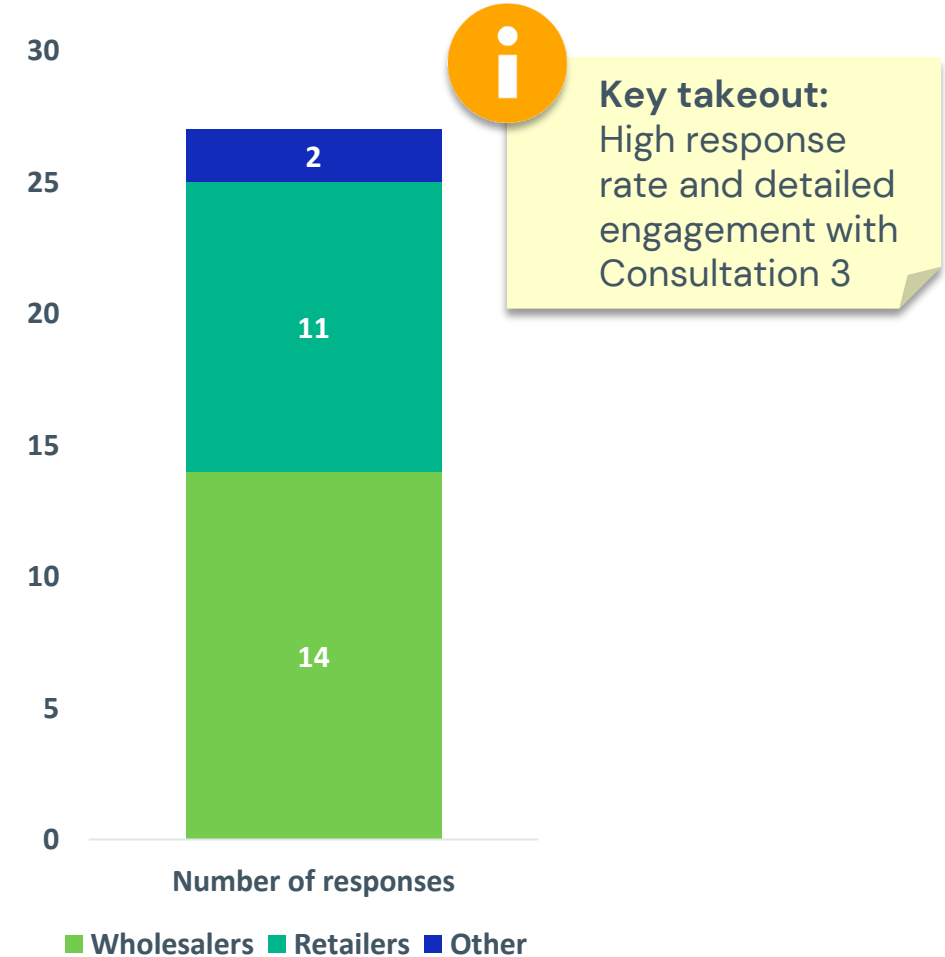
Summary of consultation responses

*Evan Joannette
November 2023*



Response rate

- Excellent engagement with pre-consultation [webinar](#)
- Additional pre-consultation 'drop-in' sessions offered, but not required
- Strong response to [Consultation 3](#):
 - 11 Retailers
 - 14 Wholesalers
 - 2 other stakeholders
- Stakeholders engaged with detail: most completed response document fully, including optional questions



Overall, to what extent do you support the proposed components of the revised MPF? (Q8)

Overall response

- **81% “Supportive” or “very supportive”:** 22 (12 Wholesalers, 8 Retailers, 2 Other)
- **11% Neutral:** 3 (2 Wholesalers, 1 Retailer)
- **7% Unsupportive:** 2 Retailers – see below

Retailer 1 (unsupportive):

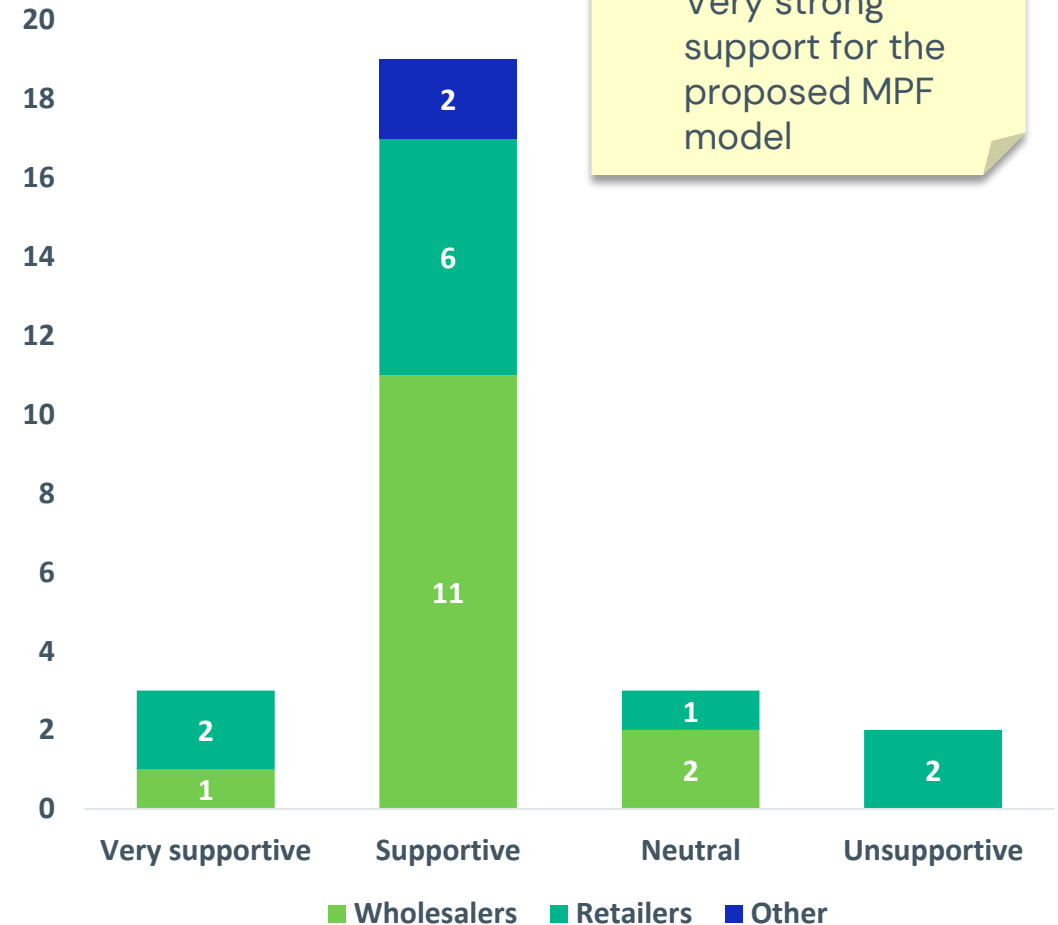
“We are not sure that this reform fundamentally really changes anything. It is a re-hash of existing measures along with some new metrics, but does it really address the issues that some participants and the market face?”

MOSL comment: The model has been built based on the risk and issues identified by the industry in Consultation 1. While elements of the proposed model may be familiar, it is significantly different to the current MPF in several ways (see Slide 6). It should also be noted that the targets and scale of penalties and/or incentives will be the subject of future consultation(s).

Retailer 2 (unsupportive):

“There is a real risk that if we determine to proceed with this set of components alone that we could in subsequent phases of this reform process introduce an unsuitable, inappropriate, and ineffective performance framework, which is expensive to implement and expensive to manage.”

MOSL comment: We are very conscious of the need to ensure we get the reformed MPF ‘right first time’ and avoid the potential pitfalls mentioned. Such things will be assessed carefully during the detailed design phase. We welcome trading parties’ input to the design stage.



i **Key takeout:**
Very strong support for the proposed MPF model

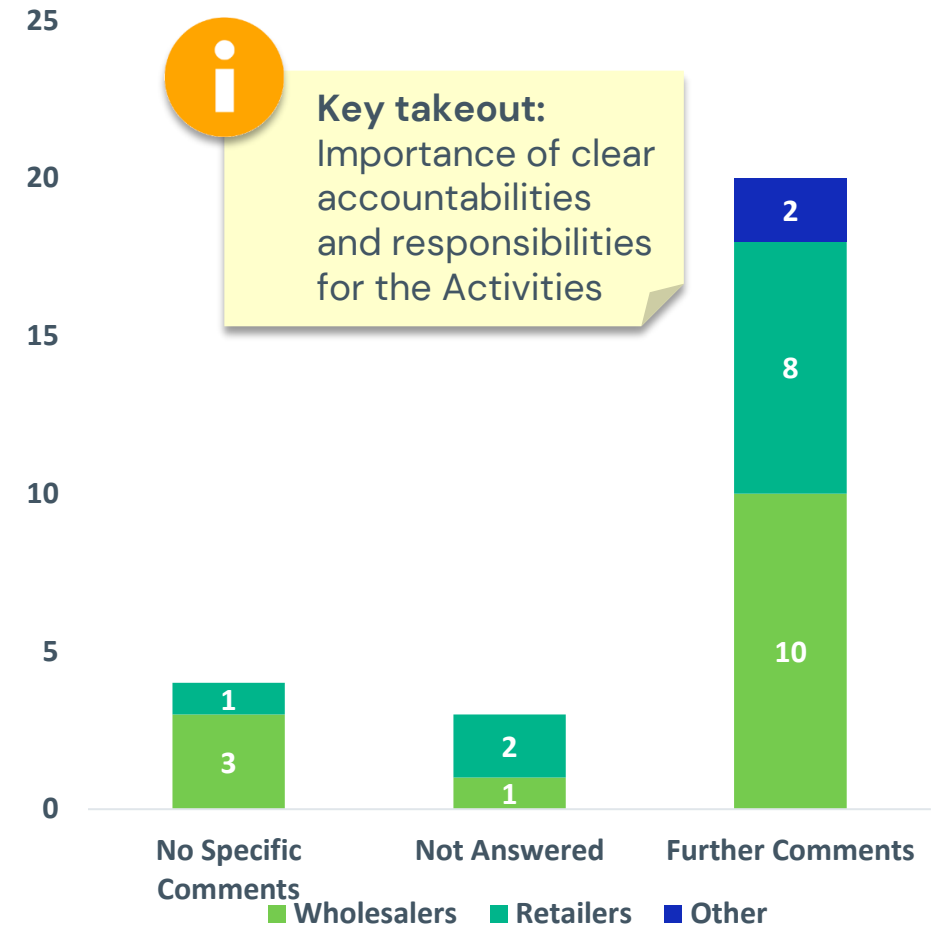
Do you have any specific comments on any of the Activities? If so, please use the reference code(s)(Q12)

Overall response

- **No specific comments:** 4 (3 Wholesalers, 1 Retailers)
- **Not Answered:** 3 (1 Wholesaler, 2 Retailers)
- **Further comments:** 20 (10 Wholesalers, 8 Retailers, 2 Others)

Key theme(s)

- Nine responses regarding ensuring **accountability** in the proposed Activities.
- **Activity A4:** Potential for a KPI to be introduced
- **Activities A4, A5, A6:** Clarity required re shared responsibility; suggestion to break these down into discrete activities to which one party was accountable to (ensure clarity of responsibility).



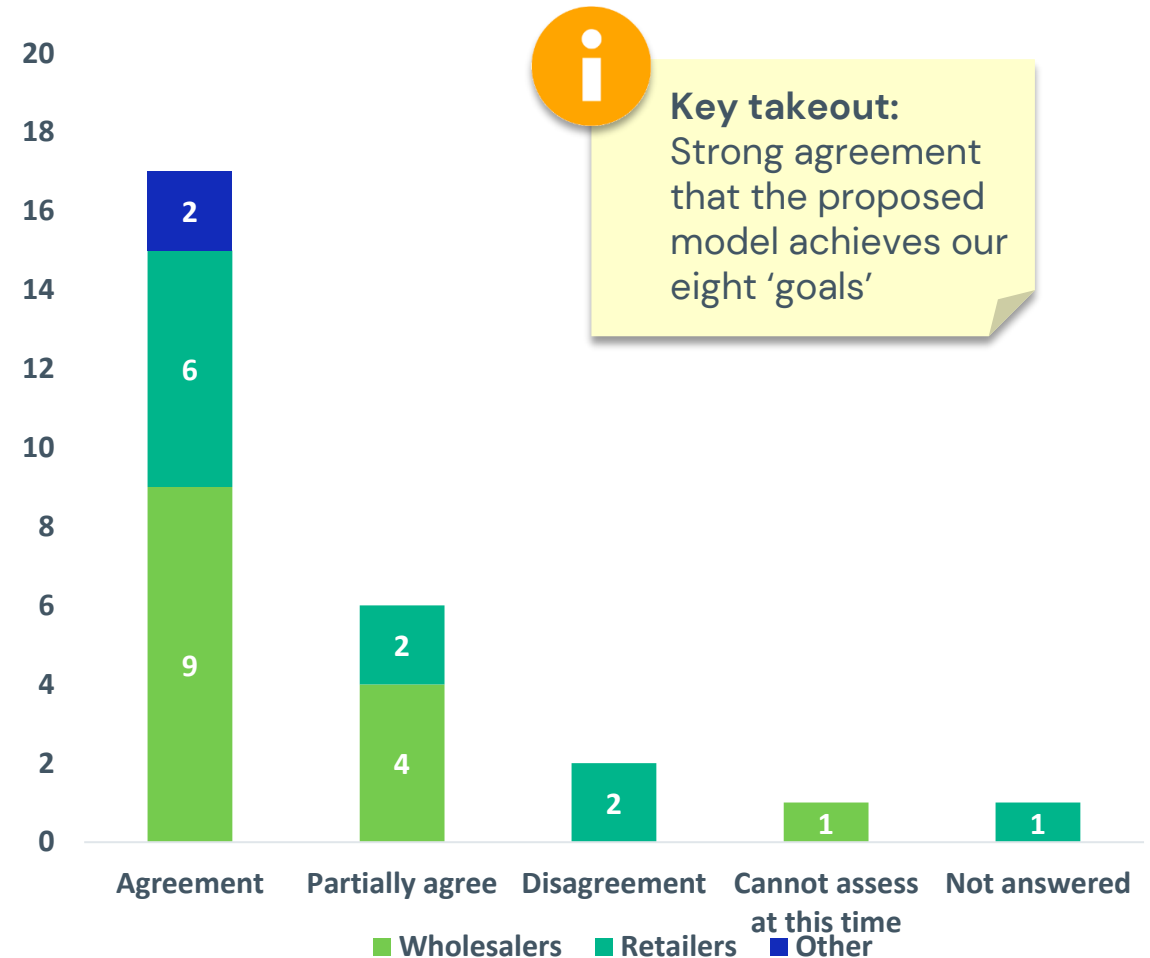
Overall, do you believe that the Activities meet the eight key success criteria? (Q14)

Overall response

- **Agreement:** 17 (9 Wholesalers, 6 Retailers, 2 Others)
- **Partially agree:** 6 (4 Wholesaler, 2 Retailers)
- **Disagree:** 2 (2 Retailers)
- **Cannot assess at this time:** 1 (1 Wholesaler)
- **Not answered:** 1 Retailer *Nb: this party was supportive of the proposed components overall (Q8)

Key themes:

- **Activities A4, A5, A6:** Failed success criteria simplicity, accountable, transparency.



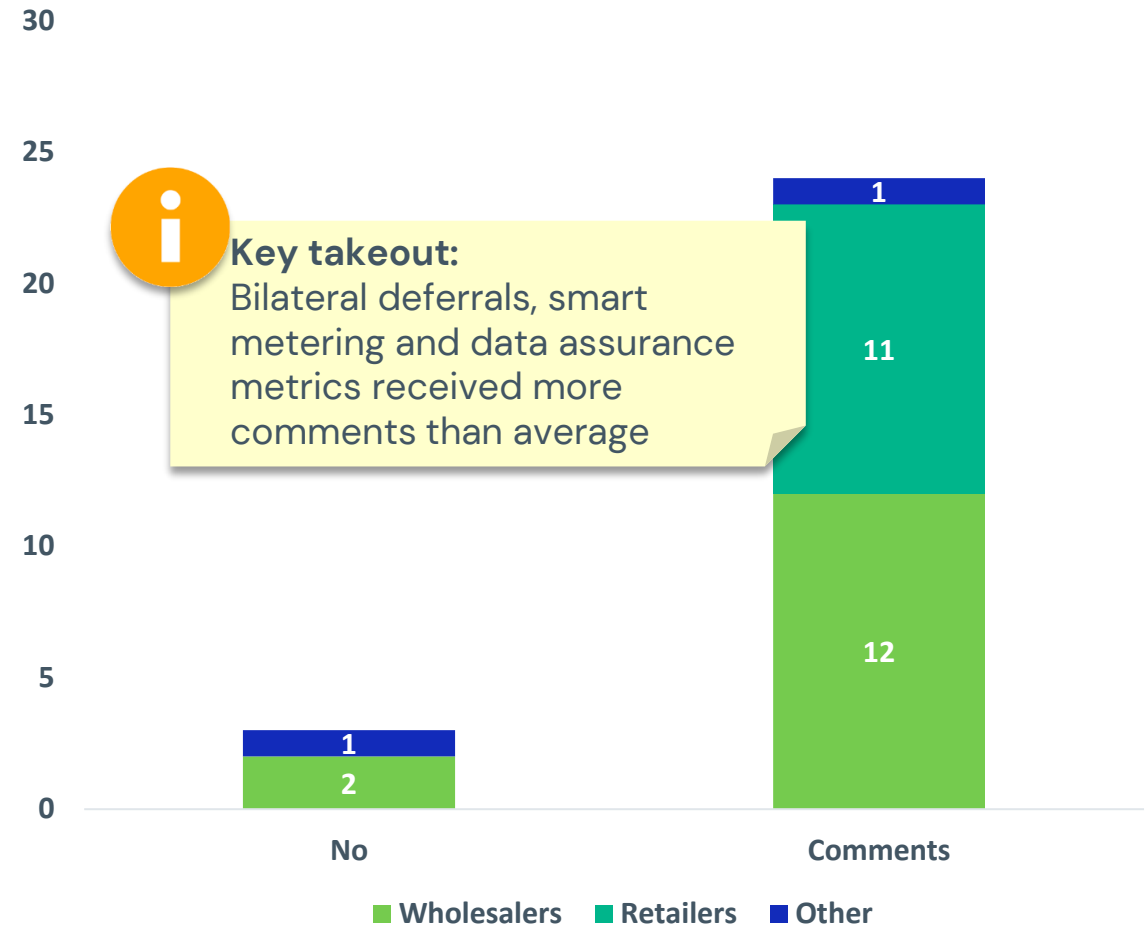
Do you have any specific comments on any of the Metrics? (Q17)

Overall response

- **No:** 3 (2 Wholesalers, 1 Other)
- **Comments:** 24 (12 Wholesalers, 11 Retailers, 1 Other)

Common Themes:

- **Detailed design considerations:** Trading parties have provided comments relating to the design of metrics.
- **Clarification:** Several parties are seeking clarification of how the metric will work in practice and others suggest clearer descriptions or definitions are needed for some metrics.
- **Metrics:** Based on answers from Q15 and 17 there is more feedback than average on bilateral deferrals, smart metering and data assurance.



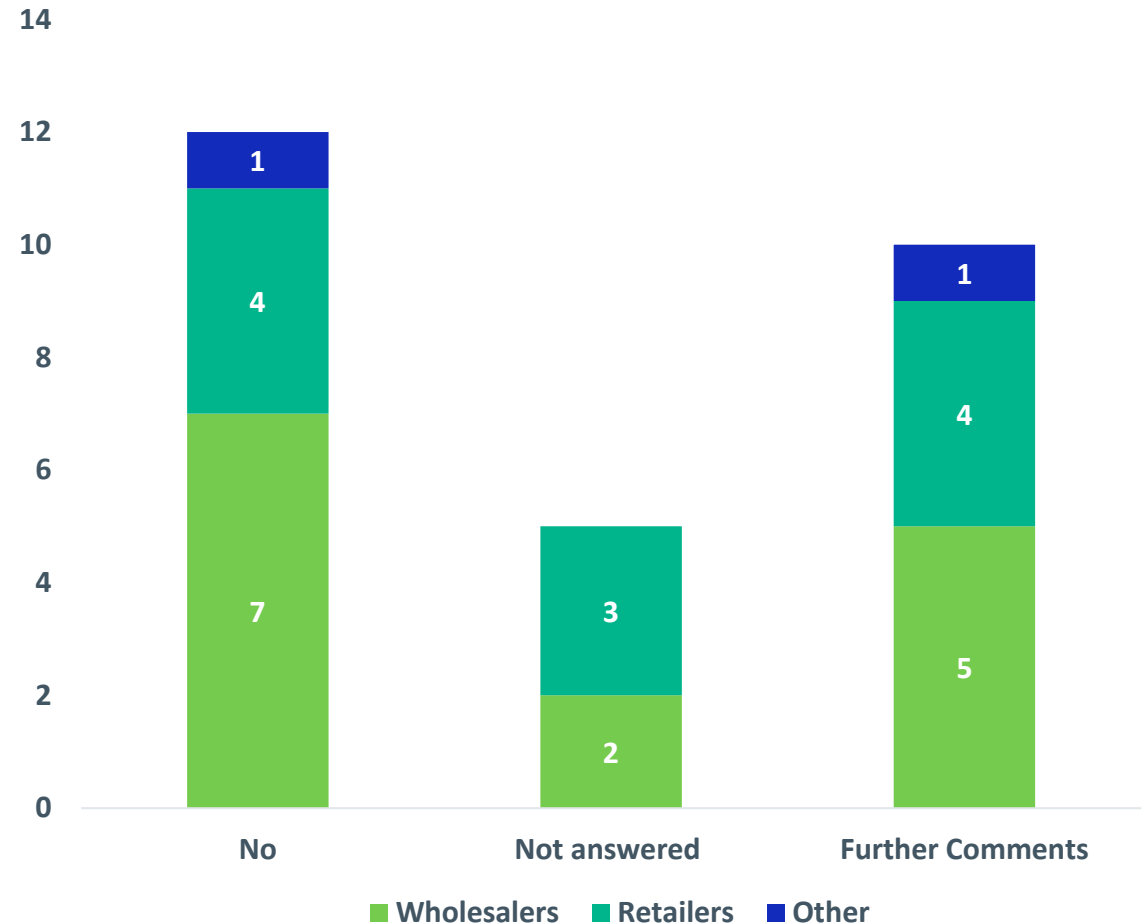
Do you have any other comments on Metrics? (Q19)

Overall response

- **No:** 12 (7 Wholesalers, 4 Retailers, 1 Other)
- **Not answered:** 5 (2 Wholesalers, 3 Retailers)
- **Further comments:** 10 (5 Wholesalers, 4 Retailers, 1 Other)

Main Themes:

- **Detailed design considerations:** Four parties provided comments relating to the design of metrics.
- **Duplication & complexity:** Two parties commented on the complexity of metrics, with one party stating that meter metrics are more complex, and the duplication of metrics.
- **Clarification:** One party is seeking clarification on the process for determining completeness and relevance of the metrics and another is suggesting clearer definitions for some metrics.



Overall, do you believe that the Metrics meet the eight key success criteria? (Q20)

Overall response

- **Agree:** 15 (8 Wholesalers, 5 Retailers, 2 Other); **Partially Agree:** 5 (3 Wholesaler, 2 Retailers)
- **Disagree:** 5 (2 Wholesalers, 3 Retailers); **Not answered:** 2 (1 Wholesaler, 1 Retailer) *however both parties were supportive of the proposed components overall (Q8)

Retailer 1 (Partially agree)

“Overall, we find that the proposed metrics meet the success criteria with regard to improving trading party accountability, consistency and compatibility with the regulatory regime, and transparency/proportionality. However, a few specific metrics fall short of the success criteria.”

Wholesaler 1 (Partially agree)

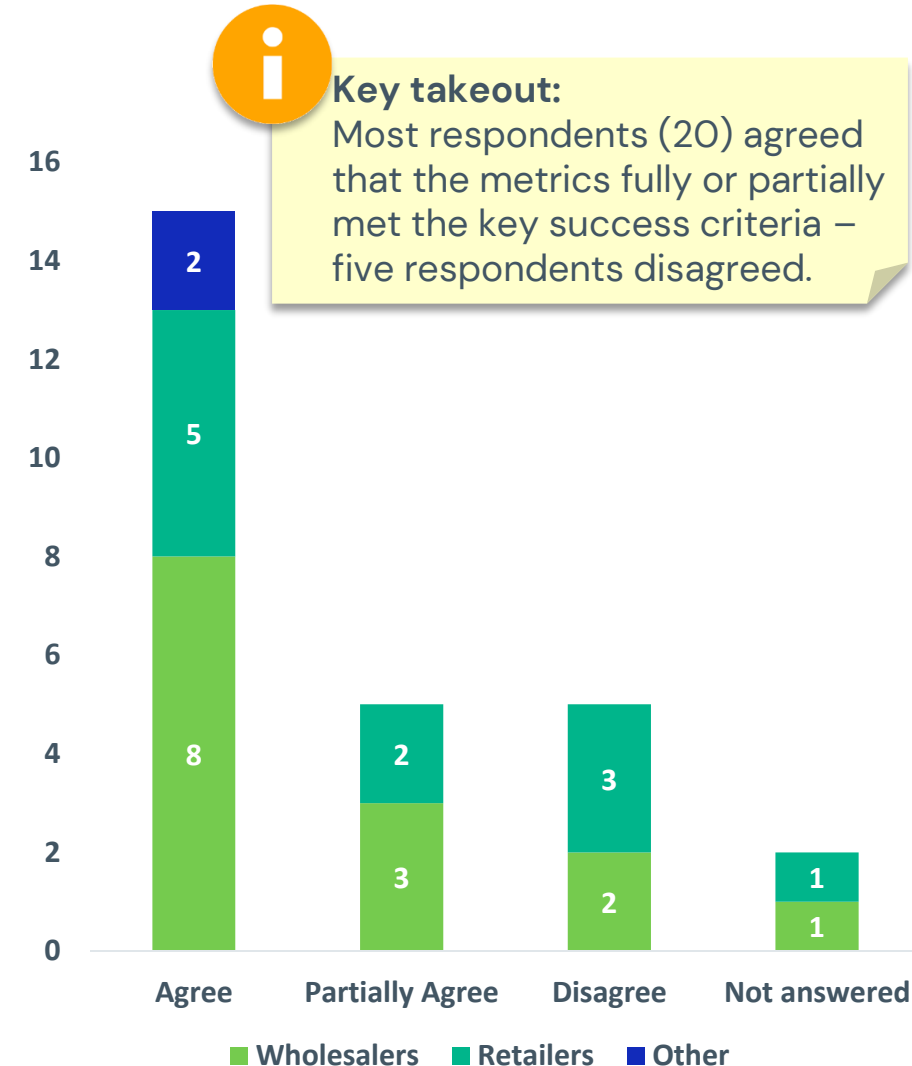
“In general, yes but we feel there are some areas where they fall short in terms of simplicity, transparency and driving customer outcomes (particularly in terms of the issues over the smart metering KPIs and their potential to disincentivize increasing smart meter coverage)”

Retailer 2 (Disagree)

“No. As mentioned above it appears that this MPF is becoming more complicated which will reduce transparency and increase costs. We are not sure that it will have the desired effect on customer outcomes as it does not truly change the way the market works. Will it drive the right behaviour? Will it move the market towards a smarter network which will improve customer outcomes. We are not sure that these reforms will do this.”

Wholesaler 2 (Disagree)

“Although they seem ‘simple’ there are a number of considerations that need to be made which we have detailed in our answer to Q17 that would make the metrics complex. Proper and accurate monitoring of these metrics would be costly due to the changes that would need to be made in CMOS.”



Do you have a preference for compensatory payments or performance charges? Please explain why. (Q24)

Overall response

- **Performance Charges:** 13 (7 Wholesalers, 4 Retailers, 2 Other)
- **Compensatory Payments:** 2 (1 Wholesaler, 1 Retailer)
- **Currently no single preference :** 8 (4 Wholesalers, 4 Retailers)
- **Not answered:** 4 (2 Wholesalers, 2 Retailers)

Retailer 1 (preference for performance charges)

"Compensatory payments may initially be attractive, but they can only work if the direct 'cause and effect' can be identified, and a value placed on that effect. We think that difficult and unlikely."

Retailer 2 (no preference)

"Before we comment on this we would need to understand what is being proposed for each activity and metric. Both compensatory payments or performance charges have their merits but until we know where they will be assigned it is difficult to judge."

Wholesaler 1 (preference for compensatory payments)

"Monthly compensation payments [are preferred] as this option compensates the parties affected by the performance rather than other trading parties who are not impacted directly by a failure."

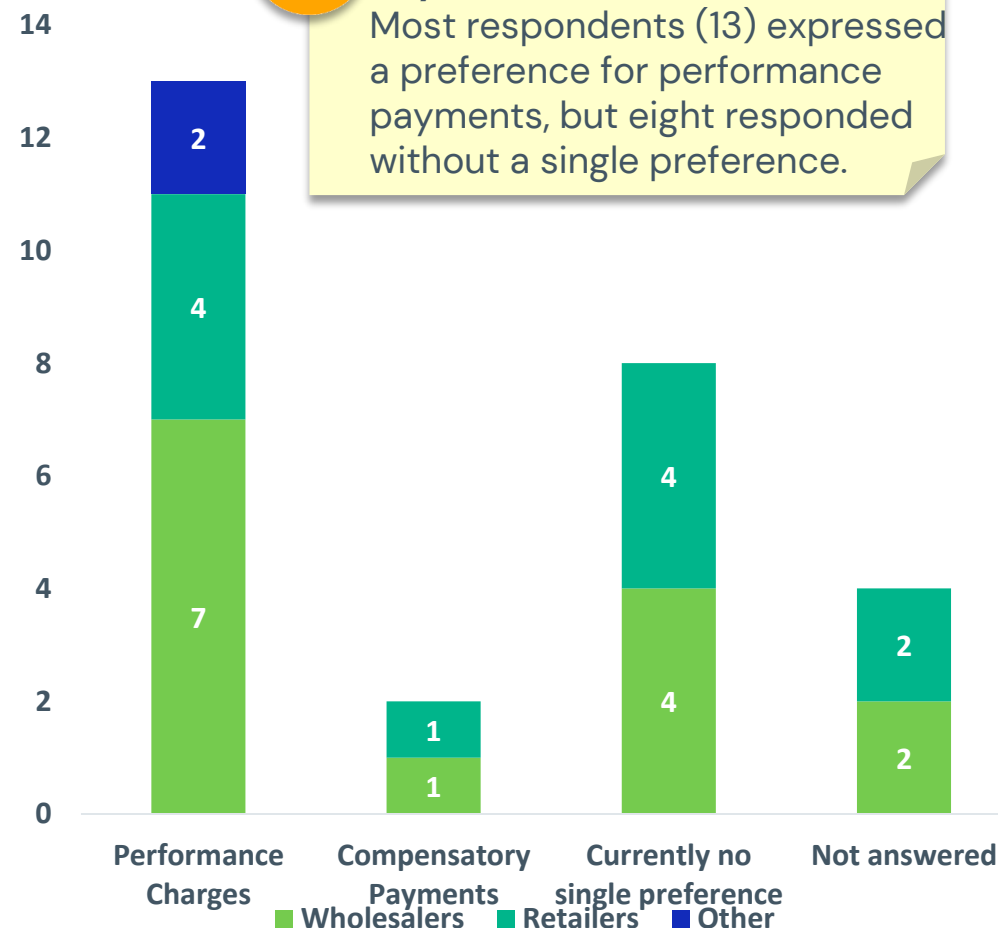
Wholesaler 2 (preference for performance charges)

"We feel that performance charges are simpler to administer and have the same incentivisation effect as compensatory payments, it also avoids making the process unnecessarily adversarial."



Key takeout:

Most respondents (13) expressed a preference for performance payments, but eight responded without a single preference.



Overall, do you believe that the Tools meet the eight key success criteria? (Q28)

- **Agree:** 19 (11 Wholesalers, 6 Retailers, 2 Other)
- **Partially Agree:** 3 (2 Wholesalers, 1 Retailer)
- **Disagree:** 2 (2 Retailers)
- **Uncertain:** 1 (1 Retailer)
- **Not answered:** 2 (1 Wholesaler, 1 Retailer) **however both parties were supportive of the proposed components overall (Q8)*

Wholesaler (partially agree)

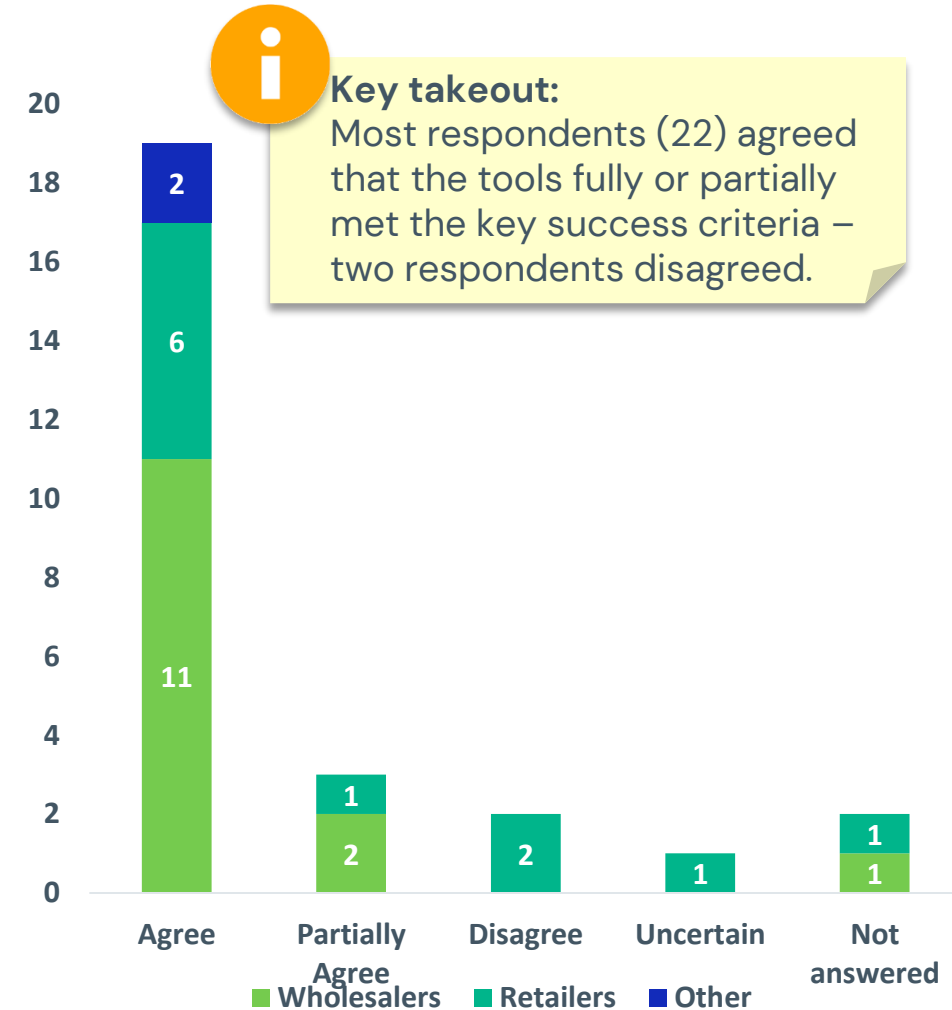
“For the most part, but the financial penalty options fail on simplicity as it is unclear either how they will operate in practice or what the relative advantages of each of them are. We are also not convinced talk of compensation is particularly transparent, proportionate, or compatible with the existing regulatory regime...”

Retailer 1 (partially agree)

“Possibly, but not convincingly. We are not convinced by MOSL’s view on many of the tools, but we do agree that the tools if appropriately used and not abused/overused could contribute towards fulfillment of the key success criteria, certainly numbers 1-3. However, we are not convinced that success criteria #6 would be delivered (proportionate), nor #7 (value for money) and #8 (simple).”

Retailer 2 (disagree)

“No. It is our opinion that there needs to be a rebalancing of financial penalty tools to ensure that wholesalers improve market data, reduce market complexity and invest in critical metering assets. Without further strengthening of the tools for wholesalers, it is likely success criteria 1, 2 and 6 will not be met.”



Do you agree with the principle of operating on a multi-year 'Performance Period'? If no, please explain. (Q31)

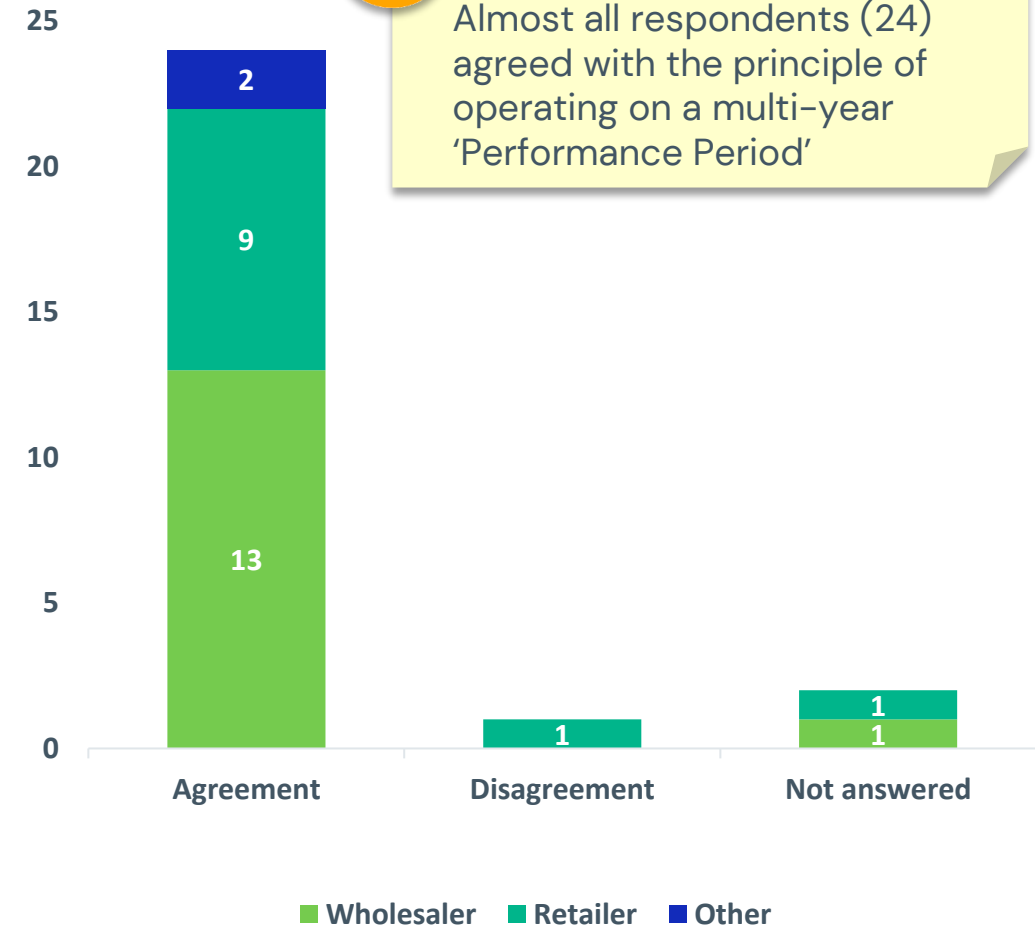
- **Agreement:** 24 (13 Wholesalers, 9 Retailers, 2 Other)

A small number of Trading Parties called out things to be mindful of, could the performance periods start and end align to the reporting year, could they align with AMP periods, could they be regularly reviewed for fitness

- **Disagreement:** 1 (1 Retailer)

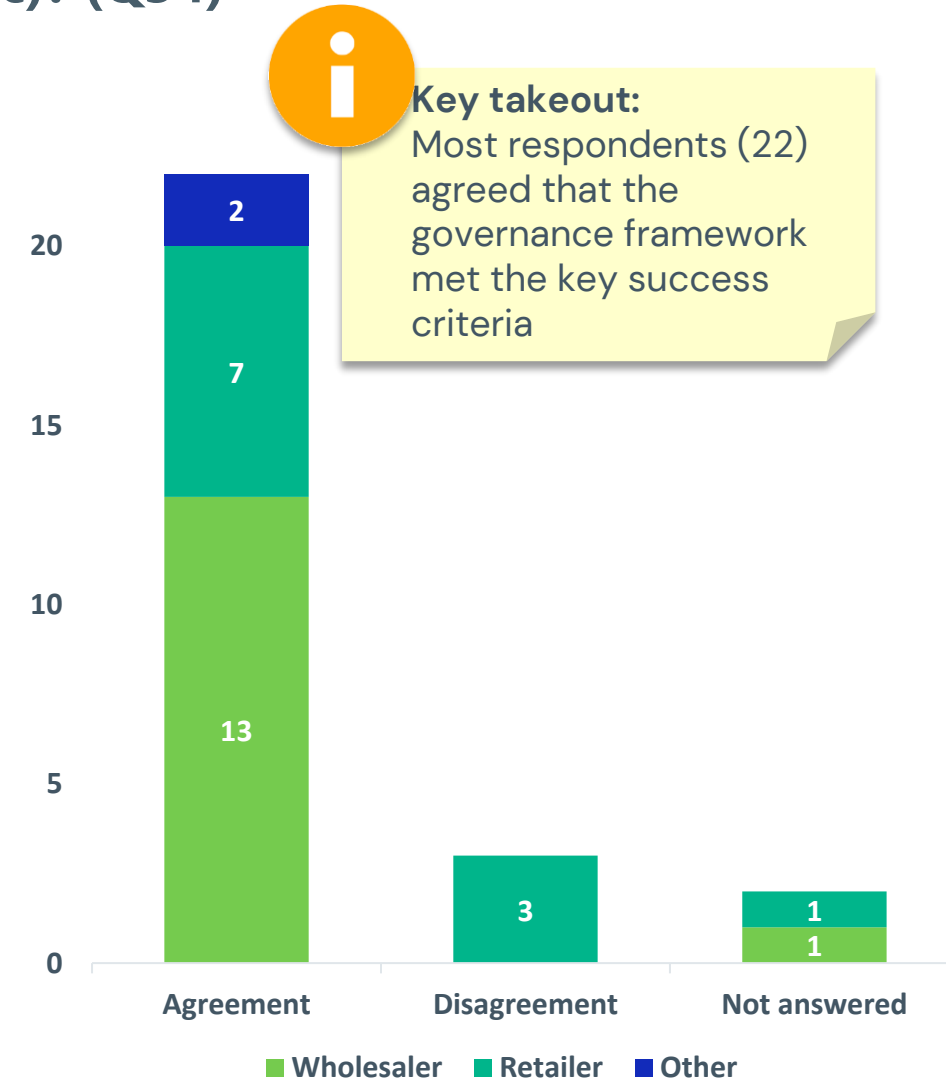
“No. Unnecessary. Adds complexity and cost.”

- **Not answered:** 2 (1 Wholesaler, 1 Retailer)



Overall, do you believe that the Governance framework meets the 8 key success criteria (e.g. simplicity, value for money, etc)? (Q34)

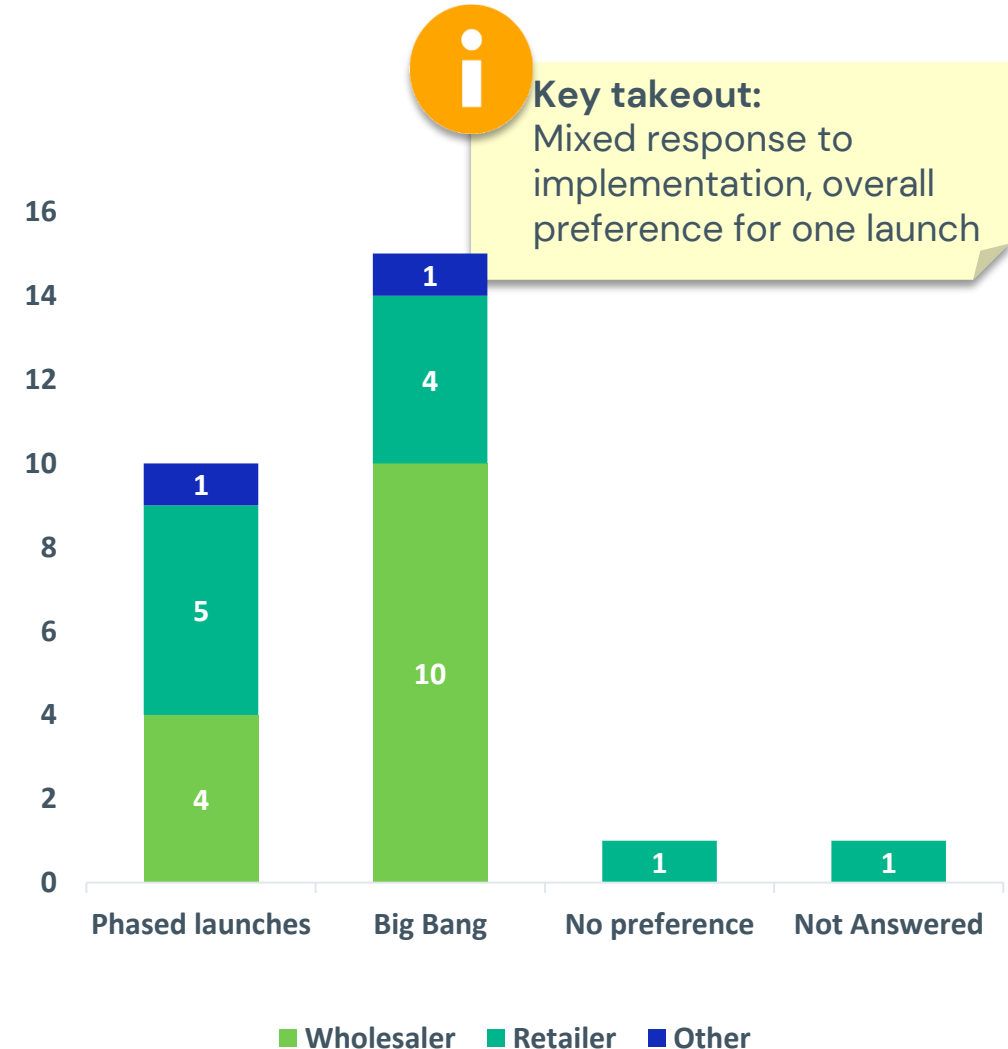
- **Agreement:** 22 (13 Wholesalers, 7 Retailers, 2 Other)
“The Governance framework meets the eight key success criteria.”
- **Disagreement:** 3 (3 Retailers)
“there is less value in a PAC composition that includes independent members, when compared to other committees such as the Strategic Panel. Having no independents will of course improve ‘value for money’ of the Committee as well as improve ‘trading party accountability’, both of which are key success criteria.”
“The governance framework as proposed lacks the necessary detail to be assessed as transparent and proportionate ... We are also concerned that it may be detrimental to competition in the long-term. We find it to be somewhat overcomplicated, and we are not convinced that it will provide good value for money.”
“No. We disagree with MOSL’s assessment of this being ‘agile governance’ and, hence, its view on governance against the eight success criteria is invalidated.”
- **Not answered:** 2 (1 Wholesaler, 1 Retailer)



Would you like to see the reformed MPF implemented in one go (a 'big bang' approach) or launched in phases? (Q35)

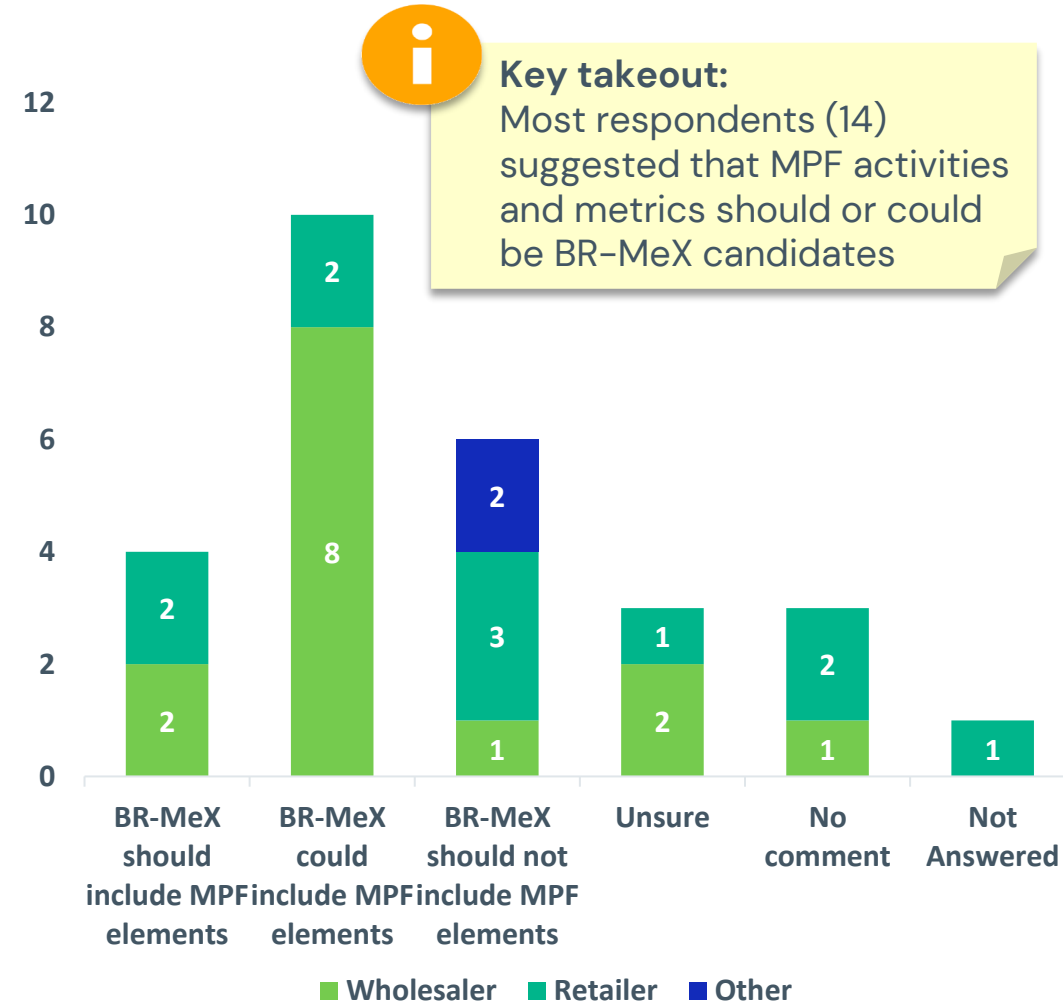
- Phased launches:** 10 (4 Wholesalers, 5 Retailers, 1 Other)
 - “Too much change too quickly could cause negative impacts to customers” (Retailer 1)
 - “There could be unintended issues/consequences, and these would be easier to mitigate in smaller batches instead of all at once” (Retailer 2)
- One launch:** 15 (10 Wholesalers, 4 Retailers, 1 Other)
 - “Avoid running two systems of performance management” (Wholesaler)
 - “Launching the reformed MPF in phases would result in a possible conflict between new and existing performance requirements, which could lead to confusion in accountability, and ultimately a worse outcome for customers” (Other)
- No preference:** 1 (1 Retailer)
- Not Answered:** 1 (1 Retailer)

One respondent left a blank response to this question



Some of the MPF activities and metrics could be candidates for BR-MeX ...any thoughts? (Q38)

- **BR-MeX should include MPF elements** : 4 (2 Wholesalers, 2 Retailer)
 “We strongly believe it would be preferable to have MPF built in as it will give the full story of performance.” (1 Wholesaler)
- **BR-MeX could include MPF elements** : 10 (8 Wholesalers, 2 Retailers)
 “There are certainly some activities that would fit in a BR-MeX framework however we suggest that where there is duplication, an activity and/or tool should only be included in one” (Wholesaler 2)
- **BR-MeX should not include MPF elements** : 6 (1 Wholesaler, 3 Retailers, 2 Other)
 “We therefore believe that while the MPF and BR-MEX are both intended to incentivise improved performance, the differences between the two may warrant them remaining separate, which would also avoid any uncertainty and lack of clarity for wholesalers if the two were interfaced.” (Other)
- **Unsure**: 3 (2 Wholesaler, 1 Retailers)
 “We see this area as a potential for BR-MeX but there is a dependency for Wholesalers in terms of keeping customers informed that Retailers provide the required contact data.” (Wholesaler 3)
- **No comment**: 3 (1 Wholesaler, 2 Retailers)
 Three respondents indicated they had no comments or could not comment without more information.
- **Not Answered**: 1 (1 Retailer)
 One respondent left their response blank.



Headlines

- **Positive feedback on Consultation 3** compared to previous consultation(s)
- **Very strong support for proposed MPF model: 80% 'supportive' or 'very supportive'**; further 10% neutral
- **No major 'showstoppers'** and **nothing major appears to be 'missing'** from the proposed MPF model
- Most respondents agreed that the **activities are sufficient** as a whole and meet the eight key success criteria
- **High degree of support for proposed metrics:** ~95% did not suggest a case to remove a proposed metric
- **13 potential new metrics suggested, but no strong candidates** – most popular suggested by only 4 parties
- Majority support for the concept of MPF metrics feeding into **BR-Mex scores**
- Almost all respondents agreed that the **proposed tools are sufficient as a whole** and can be adapted to address all known scenarios. Respondents also provided constructive feedback on the detailed design of tools.
- Overall **preference for performance charges** compared to compensatory payments, but many respondents were intrigued by the concept of the latter (again providing detailed design comments and questions).
- Most respondents were **supportive of the Governance proposals**
- ~~Respondents split on whether implementation should be 'phased' or 'big bang' – further consideration required.~~

How significant are the proposed changes?

Some elements of the proposed MPF may appear familiar. However, the changes are significant in several ways:

1. **Monitor individual TP performance** against set performance level (current MPF compares TP-to-TP)
2. **Tracking significance of failure** (e.g. how far overdue an action is)
3. **Integration of audits** to allow qualitative and quantitative consideration
4. **Focus on data quality, not just completeness** via data quality audits
5. **Improved identification of potentially market-impacting changes to trading parties' systems** via market entry re-assurance and audit tools
6. **Additional services to support performance reporting** dashboards for trading parties
7. **Compensation payments** enable, for example, retailers to receive monies from wholesalers where wholesaler underperformance impacts customers
8. **Clearer 'hand-offs' to regulatory regime** for performance incentives via BR-MeX and in relation to material underperformance or non-compliance.

MOSL





MOSL

MPF Interim Improvements CPW 144

Markus Lloyd
November 2023

Interim improvements (CPW144)

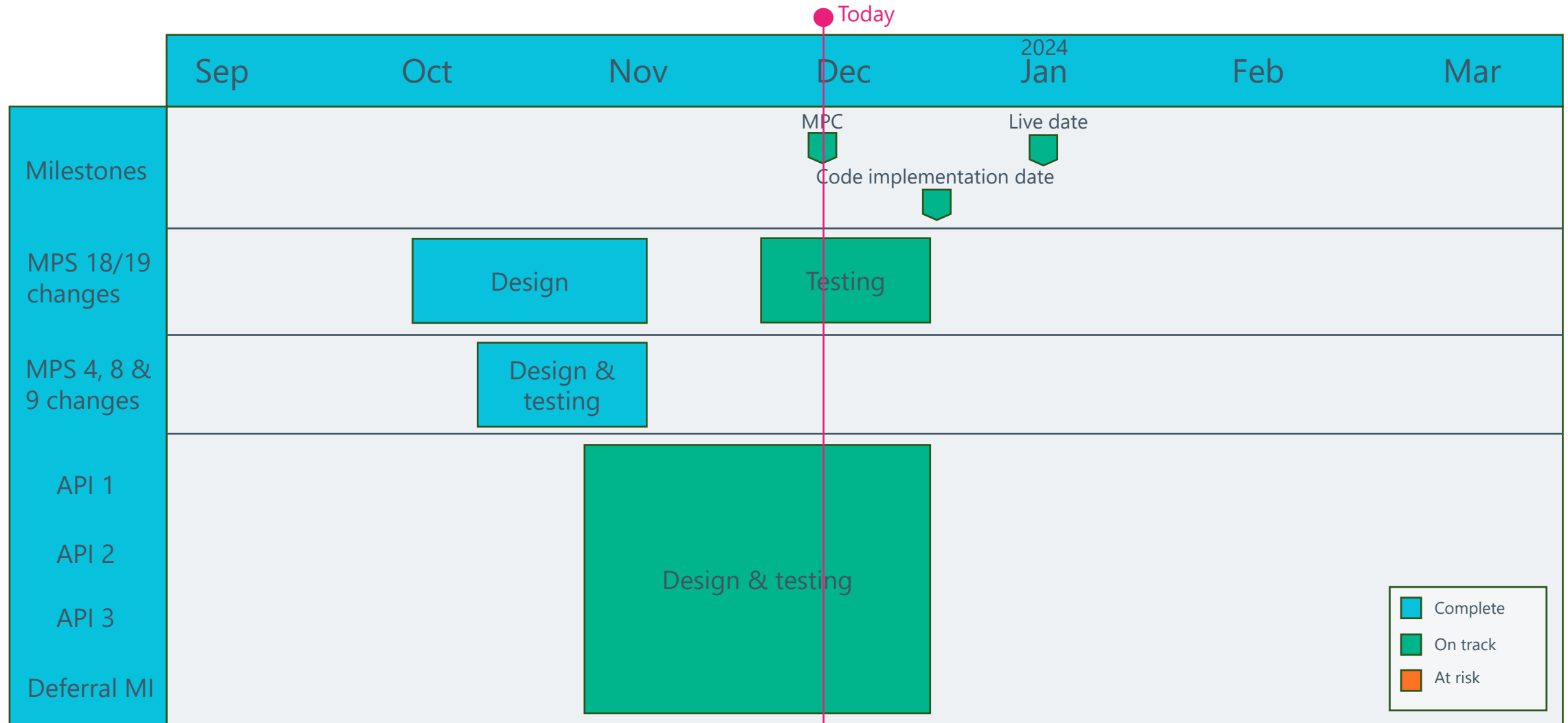
Summary:

1. Suspend retailer MPS18 & 19 charges when open request in the bilateral hub
2. Remove wholesaler MPS 4, 8 & 9 charges
3. Introduce new Market Indicator metric to track deferred requests and average length of deferrals
4. Introduce new API to track lateness of C1 (meter verifications) and B5 (meter repair/replace) bilaterals
5. Adjust current LUM API to remove any where an open request in the hub
6. Introduce new Wholesaler LUM API to measure any requests where an open request in the hub

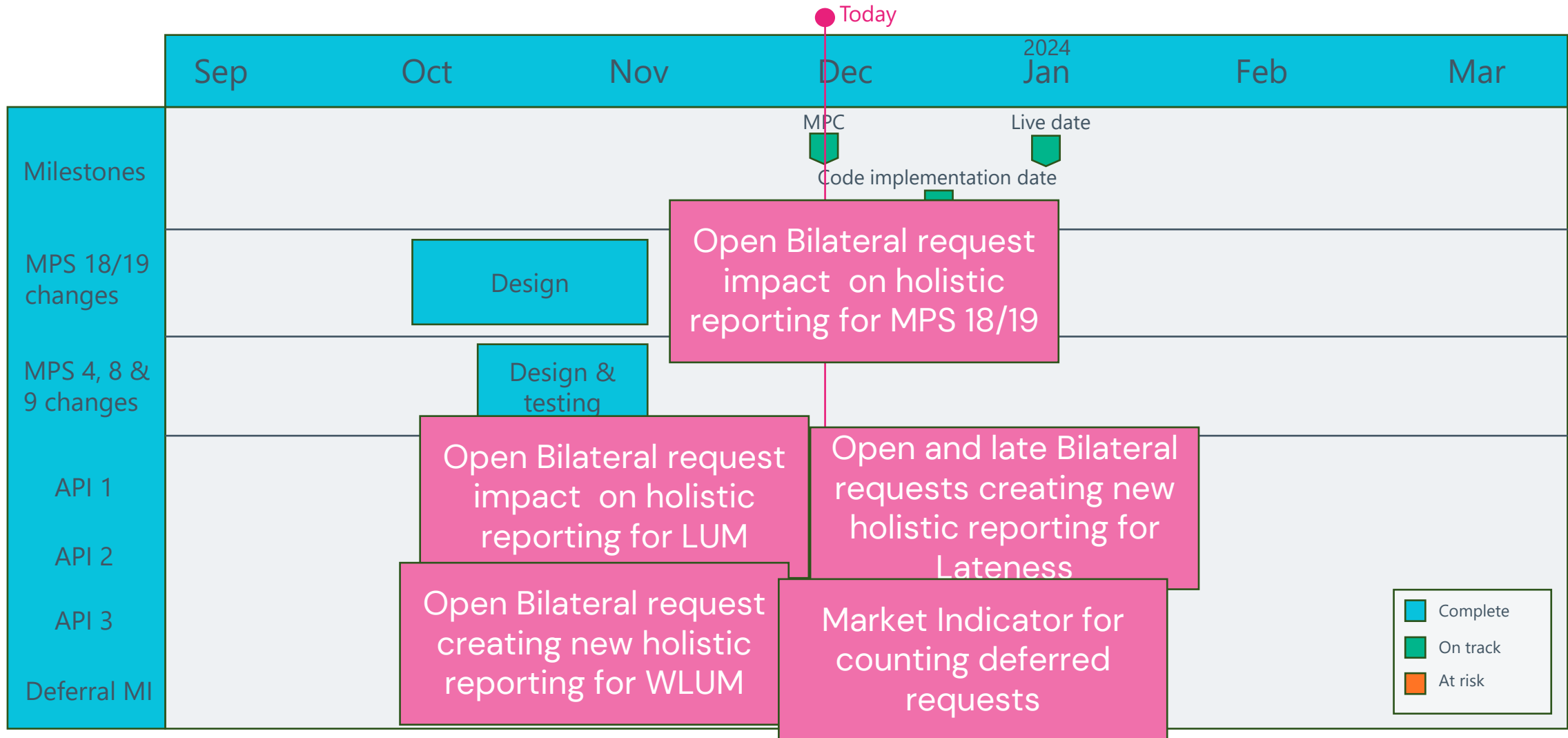
Status

-  Performance Advisory Group
-  Code Change Committee (Gate 1)
-  Market Performance Committee
-  Code Change Consultation
-  CCC (Gate 3) – September (Approved)
-  Ofwat approval ~ Nov
-  Implement ~ Nov -> Jan

Interim improvements (CPW144) implementation plan



Interim improvements (CPW144) implementation plan





Market Improvement Fund

Round three



STRATEGIC
PANEL
& Committees



Market Improvement Fund – round three



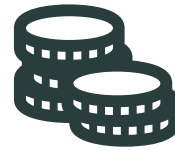
STRATEGIC
PANEL
& Committees

Market Improvement Fund

Round three



15 applications
received

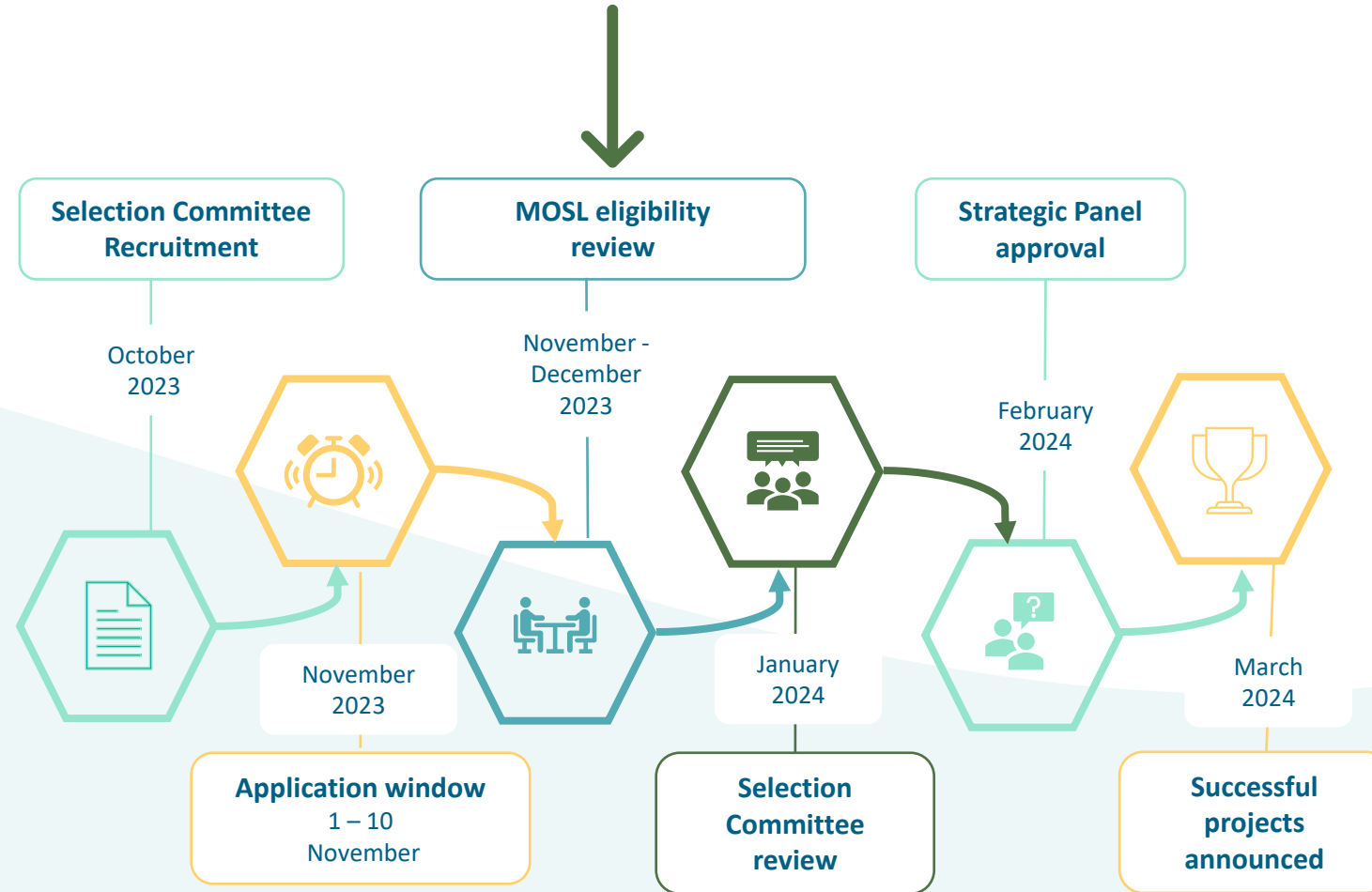


£1.9m funding
requested



- Water efficiency
 - Innovative solutions
 - Customer focused
-

Where we are





REDUCED

User Forum

WATER EFFICIENCY

- **Climate change** impacts Retailers and their customers requiring water efficiency measures to be adopted
- **Managing demand** in business customers is challenging
- Approximately **1/3 of all water consumption sits within business** customers, impacting Retailers, wholesalers, business and domestic customers and the environment.
- Human **resource capacity** in Retailers is a major issue. Retailers have many different customers with different needs
- Retailers struggle to build the **breadth of knowledge** and expertise required to solve emerging challenges in each customer type.
- Unlike wholesalers, Retailers do not have innovation departments or a Centre of Excellence to drive 'market levelling' activity which embraces and encourages competition.



REDUCED Project

- The REDUCED project has been funded through the MOSL Market Improvement Fund.
- REDUCED has created a unique, free and easy to access **online water efficiency technology portal** for all Retailers in England.
- Acting as a single point of market entry for (relevant) emerging and established technologies, the portal will provide access to **independently selected solutions**, enabling Retailers to present new technologies to business customers with confidence.
- Retailers will **choose how you engage** with the portal. You can **define business customer challenges** to which solutions will be sought through open calls and horizon scans, or rely upon other Retailers to drive the portal population, using it as a search tool only. All resulting technologies will be entered into the portal for all to access with the list of technologies growing over the life of the project.



PORTAL IS LIVE



Welcome to the Water Efficiency Technology Portal



Trial Opportunities - head to this page to understand which technologies are currently looking to implement their device/process with non-household customers.

Retrofit Technologies - this is the current library of devices that address water efficiency or consumption reduction

Industrial Technologies - this page provides bespoke case studies of technologies or processes that are industry specific and might be applicable for your customers.

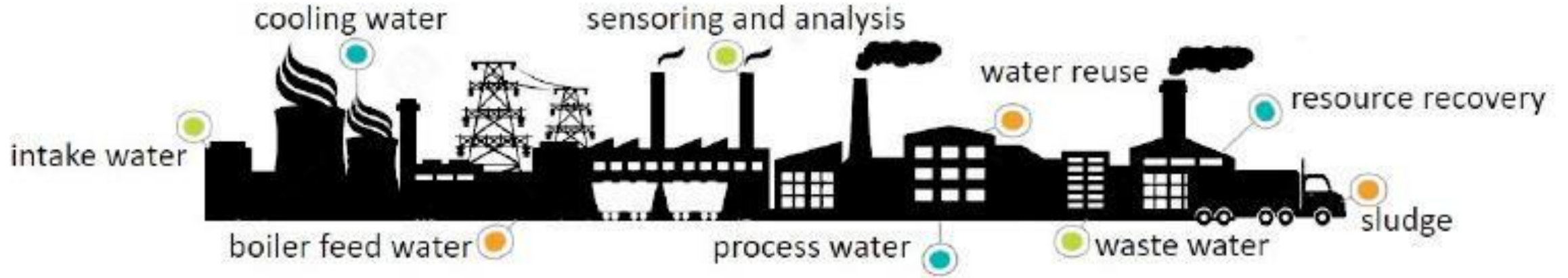
What doesn't the portal do?

- Is not a procurement portal (like Achilles)
- While all technologies have been assessed independently by Isle Utilities (see [More Information](#)), their inclusion is not a recommendation for use (see disclaimer)

What is the portal for?

This portal aims to provide a resource for Retailers, acting as an innovation library for water efficiency technologies and processes. The technologies, or group of technologies/processes, shown on this portal range from low TRL devices/processes that are in the early stages of development, right through to established and commercialised devices or processes that may have beneficial applications for non-household customers

TECHNOLOGIES



TRIAL OPPORTUNITIES

Companies/organisations that are currently interested in implementing their device/process with non-household customers.



RETROFIT TECHNOLOGIES

Library of devices that address water efficiency or consumption reduction.



INDUSTRIAL TECHNOLOGIES

Technologies or processes that are industry-specific and might be applicable for Retailer customers.

REDUCED

- Developed with a Steering Group with Retailers and MOSL to direct the development of the portal
- Constantly evolving and can be shaped by you
- If there are needs that your customer has, this can direct the portal



REDUCED



Project AMIDST



Michelle Thompson

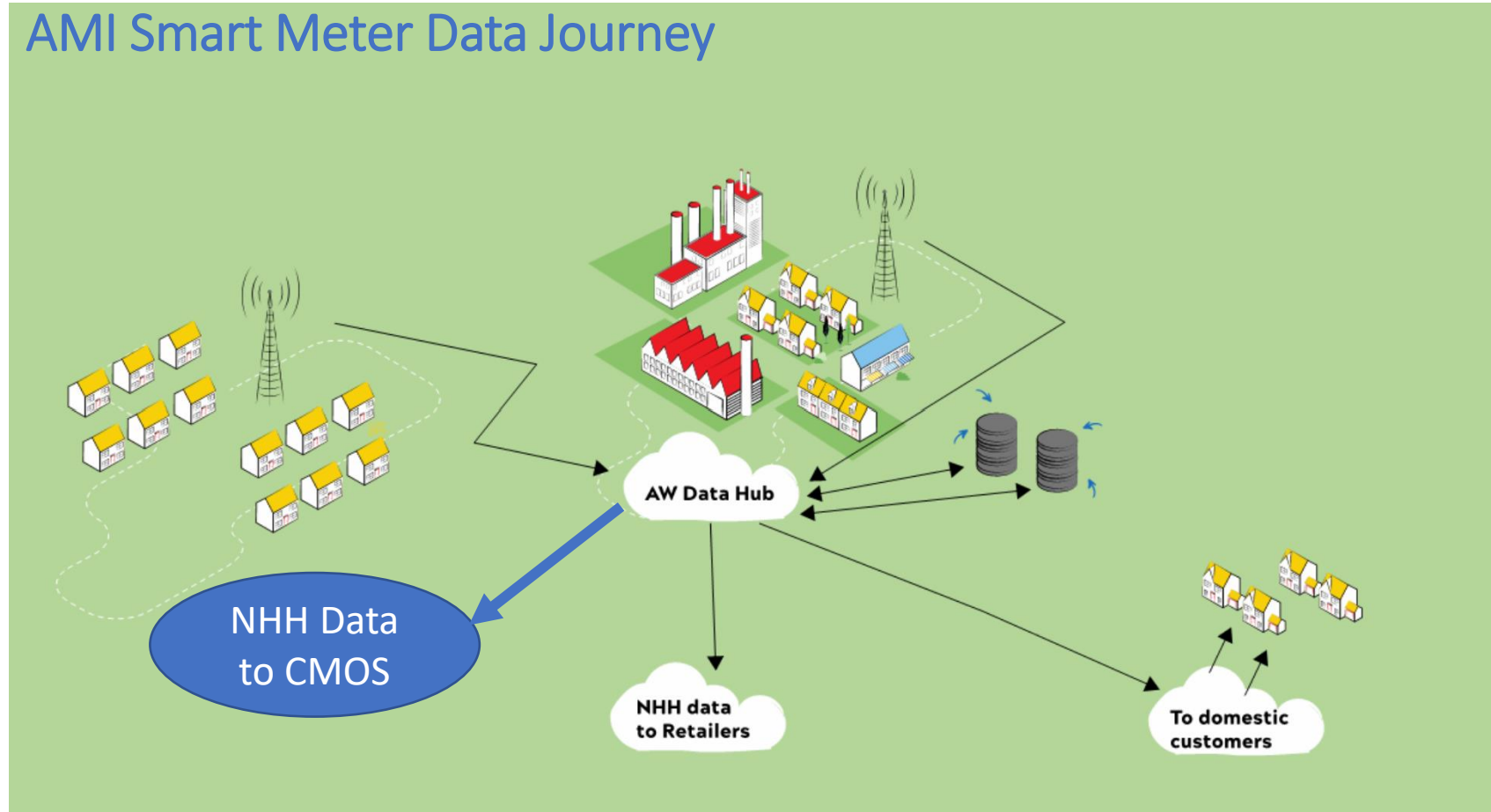


Utility of the Year



Project AMIDST (AMI Data Strategic Transfer)

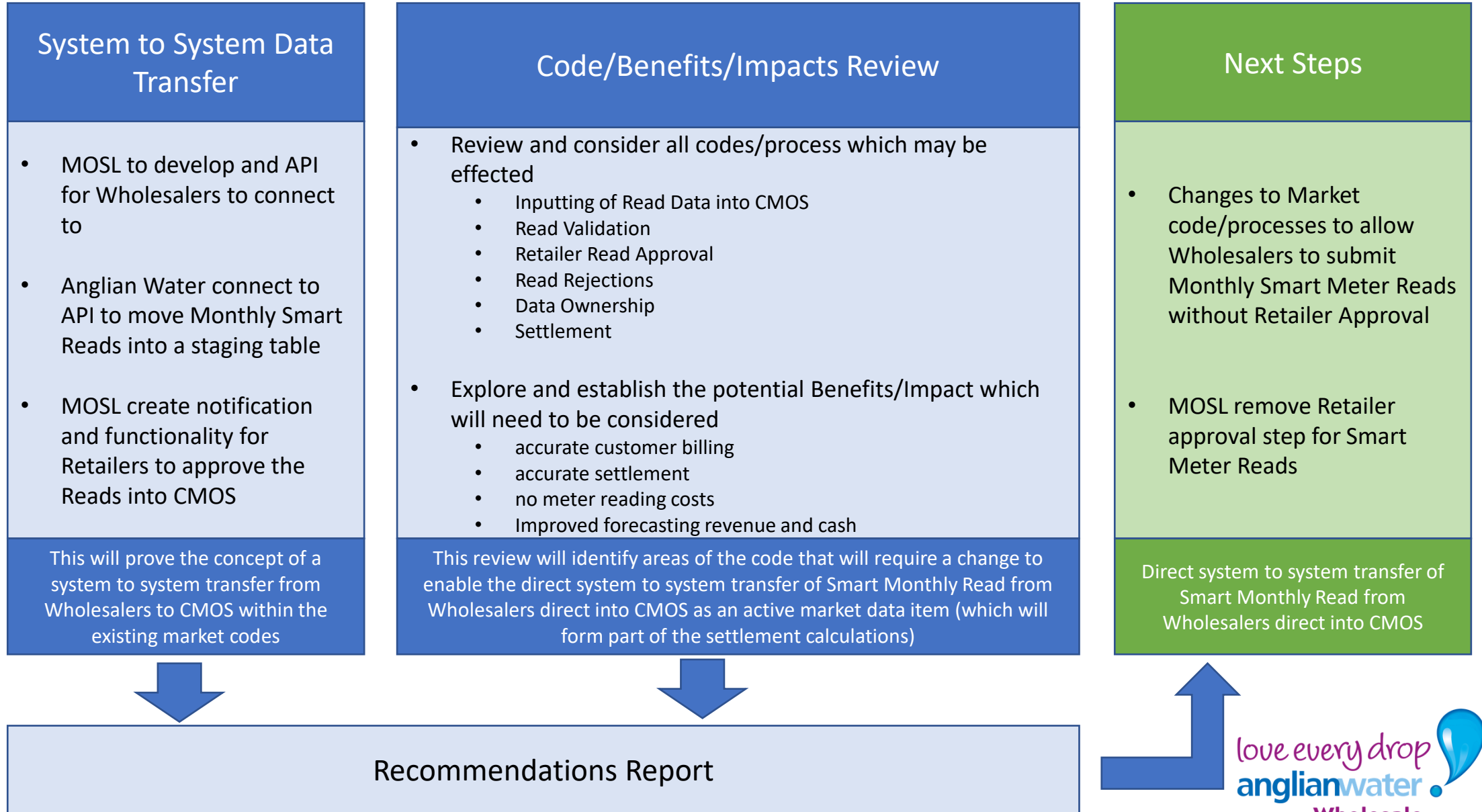
AMI Smart Meter Data Journey



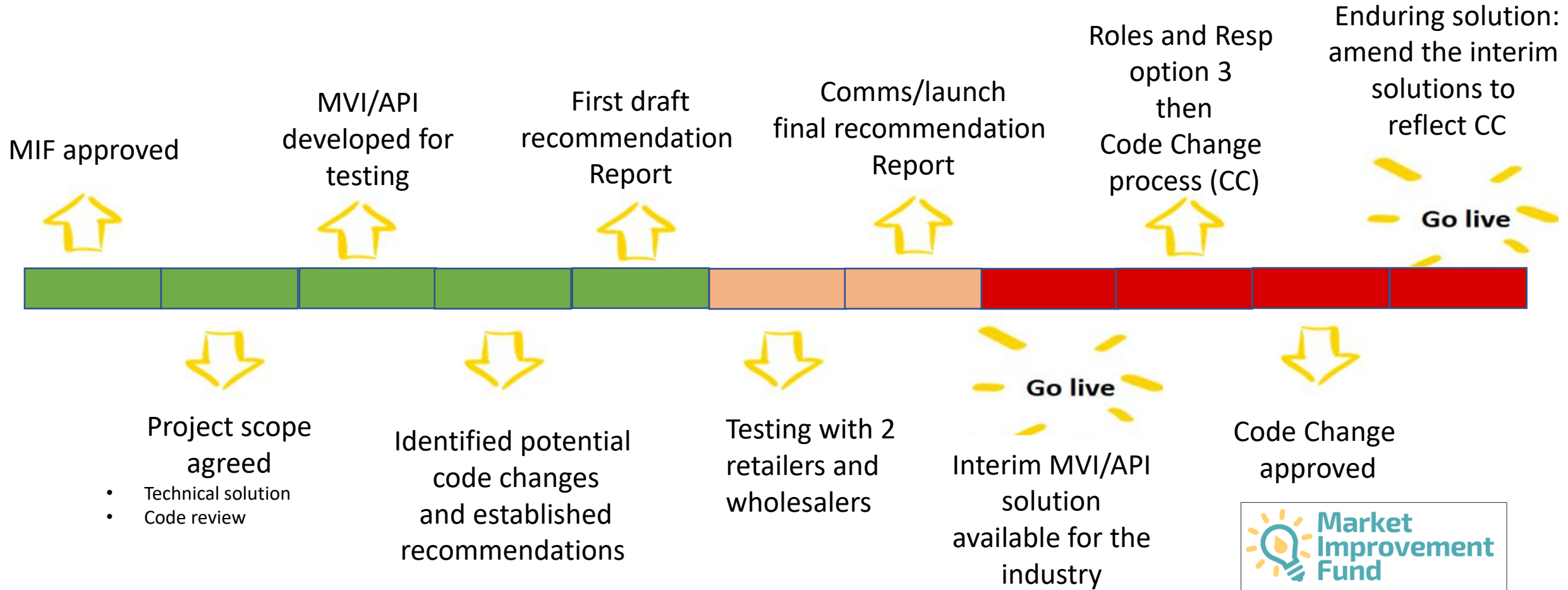
A pathfinder to investigate feasibility and benefits of sharing Monthly Meter Reads from wholesalers (Anglian Water) direct to CMOS

A joint project, a collaboration between Anglian Water and MOSL.

Project AMIDST (AMI Data Strategic Transfer)



Project AMIDST (AMI Data Strategic Transfer)



Interim solution – readings require retailer validation before upload to CMOS
 Enduring solution – readings direct to CMOS

Final Conclusion

The AMIDST project created an interim solution to allow Wholesalers to provide reads through the API-MVI and satisfied the proof of concept to provide learning into CPW142 formal code change. While this is being progressed through the code change process the interim solution is available for all Wholesalers with a Smart Metering programme to utilise.

Anglian are using this with the two retailers who were key stakeholders to this project and the below is their feedback.

“As a national retailer, we spend approximately 600 hours a year checking and converting the meter read data from different meter read service providers. Removing a large percentage of this means we could drive more contact around water efficiency and leak checks.”

“Using the AMIDST process, 97% of the reads went in perfectly. The other three per cent went through a quality check, with most passing as a re-read. We expect the first-time success rate to increase, further reducing the time spent quality checking.”

“Accurate smart meter reads coming into the market once a month means we can support our customers with accurate bills and less contact, allowing them to get on with running their businesses.”

“Project AMIDST as a proof-of-concept piece has proven successful in my eyes and should encourage other wholesalers to focus on Smart/AMI rollout plans and to share Smart/AMI read data via the Market each month; to benefit the settlement process between wholesalers and retailers as well as the end customer.”

The benefits of Smart metering and shared data are far reaching from timely leakage identification to settlement accuracy. If all wholesalers were to follow this path it could even lead to a shortening or removal of settlement stages between P1 and RF, as accurate data would be available from the initial P1 settlement stage.”

Final Conclusion



- The recommendation is that other Wholesalers should be encouraged to use the interim solution in preparation for their smart metering programmes.
- The project also recommends an enduring (longer term) solution which is the submission of AMI Smart reads to CMOS without Retailer approval. The impact of this on Market Codes has been identified with proposed recommendations.
- Following the Roles and Responsibilities review led by the Metering Committee, it has been recommended to take a code change forward giving Wholesalers responsibility for submitting Smart AMI reads into CMOS. This code change is now underway as “CPW142 Wholesaler Smart Meter Reads”
- Throughout the code change process this recommendations report can be used to assist in the code review and any decision making.

Project No Flow Update



wave



Background



wave  **ccutrace**

Occutrace, a specialised water industry service provider, conducted the Market Improvement Fund project (Ref 2022-R2-005) to assess and identify Non-Consuming Meters in the water retail market.

A random sample of 2,000 Occupied SPIDs, as registered in CMOS, was selected without distinction between internal and external meters, considering all premises as occupied as per Wave's billing systems.

The purpose of this project was to establish:

If broken

- How/why broken
- If read is correctly zero consumption
- Meter age
- Meter manufacturer
- If vacant
- If occupied, and occupier
- If demolished
- Photographic evidence of above



Headlines



wave  **ccutrace**

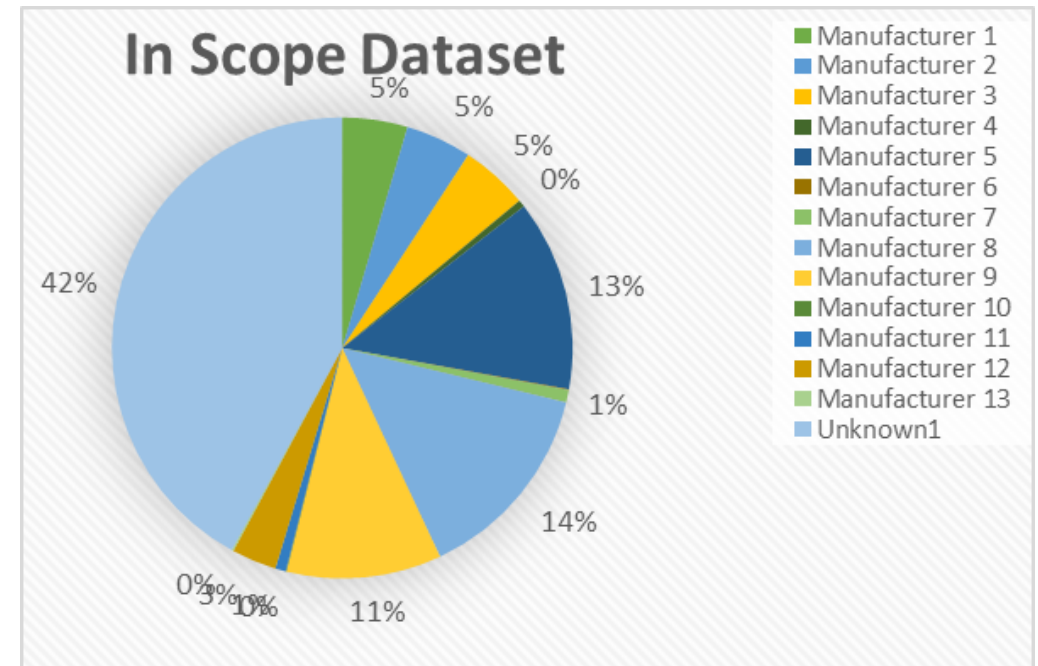
- **1618** Visits Completed
- Meter Visibly Okay No Consumption Confirmed **30%**
- Meter Okay – Consumption Confirmed **17%**
- Vacant Premises – **27%**
- Challenges with Access Issues Unable to tap Test – **17%**



Data Set



- Occupied SPIDs with more than 3 reads showing no consumption.
- We segmented the data into regional pots of work, set about conducting the visits, making appointments, and establishing occupancy of SPIDs.
- Established that 277 meters were operating as expected (17%)
- 493 meters had issues and were found to be physically damaged, or another malfunction established following a tap test (30%)
- 847 were unable to be confirmed for various reasons such as premises being vacant customers unable unwilling to tap test the supply (52%)



Meter Problem Established



Meter Problem Established	Number	%
No Consumption Confirmed	351	71%
Other Visible Damage	75	15%
Water Ingress	40	8%
Glass Smashed	12	2%
Dirt in Dial	9	2%
No Supply to Trough	2	0%
Disconnected	2	0%
Tampered With	1	0%
Backwards Consuming	1	0%
Leaking	1	0%
Total	494	100%

- 64% of the 771 meters that were located and tested (Consumption Confirmed & Meter Problems Established) were found to be degraded to the point of being non-functional.
- This has many impacts on the customer, wholesale settlement and water demand data models throughout the country.



Unable to Confirm



- A field survey of 1618 SPIDs from Wave found that 232 were vacant, despite being initially indicated as occupied.
- Improvements go beyond metering operation an example of this would be to ensure occupancy status is accurate, not only from meter access perspective but from debt management perspective too.

Unable to confirm Operational	Number	%
Meter Visually OK	386	46%
Meter Not Found	187	22%
Access Issue	183	22%
Unrecorded Exchange	31	4%
Asset Issue	30	4%
Premises Issue	13	2%
Customer Issue	8	1%
Health Safety	7	1%
Chamber Issue	2	0%
Total	847	100%



Final Steps & Recommendations



wave  **ccutrace**

- Complete 2nd Draft of Report
- Host joint Webinar with MOSL

- Introduction of a meter asset management program
- Replacement of broken meters with smart remote reading technology
- Tackling specific CMOS Data quality weaknesses



SMR Quick Start projects

User Forum Update

Simon Bennett
November 2023



SMR Quick start projects in flight



MOSL

QSP6: Hard to Read Meters – ongoing

Covers have been added to the existing debris guidance document. MC reviewing before publication. Following roles and responsibilities' 'defined circumstances' feedback, a potential for a "hard to read" flag in CMOS being reviewed – HLIA received from CGI (High) received. PIP199

QSP8: Transfer Reads – ongoing

A charter for transfer read disputes that retailers can sign up too and code wording on T Reads around estimated reads being developed. PIP088

QSP9: Standard Meter Location Descriptor and What3words – ongoing

PIP150 considering adding What3words as a data item in CMOS. Further evidence has been collected following feedback from MC32.

QSP15: Sub Metering – ongoing

CPW143 Yearly Volume Estimate (YVE) change raised by Castle Water, with support of Metering Committee has been signed off by Ofwat. Further 'R Read' process being developed using the bilateral hub (F7 March 2024).

QSP16 – Continuous Flow – ongoing

The scope agreed. A Trading Party questionnaire sent out in September and feedback reviewed. Artesia to support on Continuous Flow definition.

QSP17 – Internal Meters – ongoing

Scope agreed, "Internal meter" retailer-to-wholesaler process has been shared with the Metering Committee, which is working closely with the RWG Access Group to avoid duplication.

QSP18 – Logger-to-Smart meter switching process – ongoing

Feedback from Metering Committee has been reviewed and has obtained sign off for publication in December. Also looking at a code change for retailers to update the data logger data item in CMOS (presently wholesaler only). High level impact assessment received from CGI (High). PIP194

QSP19 – Trade effluent meters – ongoing

Debate was held at September User Forum to understand main trade effluent metering issues so scope can be agreed. Review of existing MOSL documentation carried out, LLUM, good practices, customer contact details in CMOS and remote reads being investigated.

QSP20 – Standard Metering List format – Complete

Feedback received from Metering Committee. Publication was agreed and signed off at MC31. Document was published in November. Project now closed.

QSP21 – Customer view access to CMOS – ongoing

'Lite' version has been investigated showing customers just their Retailer and Wholesaler. Potentially to host on the Open Water website. Further work to understand full costs (£25k). PIP196. MIF bid in progress.

QSP11 – New Connections – Not started

Scope TBC. Sponsor found, group to be put together in December.

Documents and Changes QSPs have produced so far

<https://mosl.co.uk/services/market-improvement/programmes-and-projects/strategic-metering-review/smr-key-documents>

<p>QSP20: Standard Wholesaler Metering List (Word) 06/11/2023</p> <p>View Download</p> <p>Versions</p>	<p>QSP1: Market data sharing agreement (22 Feb 22) 22/02/2022</p> <p>View Download</p> <p>Versions</p>	<p>Metering technology and supplier overview (as at Sept 2023) 12/09/2023</p> <p>View Download</p> <p>Versions</p>	<p>Hard to read meters: debris guidance 20/06/2023</p> <p>View Download</p> <p>Versions</p>	<p>Hard to read meter definitions 03/10/2022</p> <p>View Download</p> <p>Versions</p>	<p> Standardising Meter Location Free Descriptor Good Practice Guide</p> <p>View Download</p> <p>Versions</p>
<p> Standard Skip Codes and Processes</p> <p>View Download</p> <p>Versions</p>	<p> Meter Reading Standards Market Guidance</p> <p>View Download</p> <p>Versions</p>	<p>CPW109 Customer Reads, CPW128 Volume Validation, NCC024 Case Sensitivity, CPW141b Chambers, CPW123 Remote Read Types, CPW130 Estimated Reason Codes, CPW141a Visual/Remote Reads and CPW143 YVE Non-market meter</p>			

Future Ideas of QSPs 24/25

From User Forum feedback Nov 22

- Handheld meter read devices – AMR readers standardization options
- X10 meters – register needs times 10 for actual consumption/CMOS flag/meter replacement/types/manufacturer.
- CMOS estimating process – How CMOS estimates meter reads, YVE's, ILEs, G-Reads
- 3rd Party or customer access/view to bilateral hub

From Original 2021/22 Metering Committee list

- Definition of an un-meterable property
- AMR read accuracy – review of technologies/evidence.
- Accuracy of pulse output smart meter/loggers
- Meter read frequency – revisit change proposal CPW118

Others

- Operational Meter Related Toolbox Talks to support Wholesaler and Retailer Teams
- Improving XY co-ordinates for Meter Location
- Outputs/recommendations of Meter related MIF projects – .e.g NoFloW



MOSL

**Open
Session**

SMR QSPs - Metering

What have we missed?

What would you prioritize?

**Let's talk
about**

AOB

User Forum

Markus Lloyd and Simon Bennett

November 2023

MOSL

