

User Forum

MOSL

Online

Hosted by
Katie Franklin & Simon Bennett
15 May 2024



Agenda

Item	Description	Who	Time
1	Introduction: MOSL	Simon Bennett and Katie Franklin	3 – 3.05pm
2	Change	Sayonee Nandi	3.05 – 3.15pm
3	National Metering Strategy	Martin Hall / Chris Dawson	3.15 – 3.45pm
4	Data Sharing, Strategic Project final report	Martin Hall and David Gough Artesia	3.45 – 4.15pm
5	Break		4.15 – 4.20pm
6	Deferrals Audit	Axelle Saada	4.20 – 4.30pm
7	Debate: Deferrals	Axelle Saada	4.30 – 4.45pm
8	Retailer Wholesaler Group update	Ray Porter	4.45 – 4.55pm
9	AOB and Close	Simon Bennett and Katie Franklin	4.55 – 5pm

Questions for Chat

**Please put a
Q in front**



Changes

Sayonee Nandi
MOSL

15 May 2024



Change Proposals/Reports to table at CCC in the next 3 months* (1/2)



Reference	Title	Summary	Stage	CCC meeting date(s)
CPW126	Settling of Post RF Primary Charges	The solution enabled Wholesalers to invoice these positive amounts up to 28 months following the RF settlement run, in instances where the Retailer has received the correct charge from the customer.	PIR	14 May 24
CPW085	Premises Vacant transaction link to DPID	Implement CMOS validation to prohibit premises occupancy change to Vacant if there is an active DPID on the premises.	PIR	14 May 24
CPM058 & CPW149 (b)	MPF Reform – Tools Part 1	Seeks to deliver the first tranche of tools relating to market entry assurance and assurance statements, targeted audits and rectification & escalation activities (amongst others).	Recommendation	14 May 24
CPM059	MAC & MOSL Articles Duplication	Revise the Market Arrangements Code and MOSL's Articles of Association to eliminate redundancy and align membership, voting, and director appointments. Update the classification of Associated and Unassociated Retailers to match the Strategic Panel's approach.	Acceptance and Prioritisation	14 May 24

Change Proposals/Reports to table at CCC in the next 3 months* (2/2)



Reference	Title	Summary	Stage	CCC meeting date(s)
CPW139g	Bilateral Hub(Additional enhancements pt2)	CPW139g will deliver the Wholesaler-to-Wholesaler enquiries (F8), the Retailer-to-Retailer enquiries (F9), a final read data item for completed B3, B5 and B7 processes plus some other enhancements such as transfer reads challenges between retailers and improved add comment functionality	Recommendation	09 Jul 24
CPW150	Governance of Incentive Scheme Guidance Documents	Seeks to relax the obligation and allow MOSL to update the documents without Ofwat approval to reflect current practice through a housekeeping change/simplified process change.	Recommendation	09 Jul 24

Trading Party requests*



Reference	Title	Engagement type	Start date	End date
CPM059	MAC & MOSL Articles Duplication	Consultation	13 Jun 24	1 Jul 24

Awaiting Ofwat Decision*

Reference	Title	CCC Recommendation	Decision Due	Implementation Date
CPM058 & CPW149(a)	MPF Reform-Governance	Majority recommendation	24 May 24	26 Jun 24
CPW142	Wholesaler Smart Reads	Majority recommendation	13 Jun 24	06 Dec 24
CPW148	Transfer read Notifications for Outgoing Retailers	Unanimous recommendation	13 Jun 24	06 Dec 24
CPW132	Credit Support and Wholesaler Credit ratings	Unanimous rejection	Overdue	Overdue
CPM054 & CPW145	Deductions and withholdings under Dispute Process	Majority recommendation	Overdue	Overdue

Awaiting Implementation*

Reference	Title	Central System Impact	Date of Release
CPW139f	Bilateral Hub (Accredited Entities, Planned & Unplanned events, additional enhancements pt1)	Y	26 Jun 24

Implementations*

Reference	Title	Central System Impact	Date of Release
CPW143	Wholesaler Maintenance of YVEs for NMMs	Y	10 May 24



Strategic Metering Programme

Update to User Forum

15 March 2024



STRATEGIC
PANEL
& Committees

National Metering Strategy

- Strategy published on 27 March
- Webinar well attended (110+); excellent engagement
- Strategy downloads approaching 1,000
- Webinar slides with link to recording downloaded 200+ times
- Communications:
 - Strategy issued widely to CEOs, Contract Managers and other stakeholders
 - Press release issued to trade press and national media
 - Multiple social media posts
 - Water Report features in April and May – including interview with Lucy and Chris
 - Presented at Smart Water Systems Conference
- Ofwat’s Draft Determination due to be published in June

The collage features several key pieces of media coverage:

- Water Report Magazine:** Two covers are shown. The top one is titled 'COMpetition WATCH' and 'SKIN IN THE GAME', featuring an interview with Lucy Darrah. The bottom one is titled 'THE WATER REPORT' and 'POLICY | REGULATION | COMPETITION', featuring an interview with Chris O'Brien.
- Strategic Panel Report:** A document titled 'Strategic Panel' is visible, discussing the national metering strategy.
- Video Player:** A video player shows a recording of a webinar. The video title is 'We've often talked about having a twin-track approach to water resources. That's never felt more true.' The video is from May 2024.

MOSL @MOSL_ · Apr 29
 We were delighted to be invited to present at the Smart Water Systems Conference last week. Metering Sponsor, Steve Formoy, gave an overview of the Strategic Panel's recently published Metering Strategy:
bit.ly/3Uc3f8w

The post includes a video thumbnail showing Steve Formoy speaking at the Smart Water Systems Conference. The video title is 'Steve Formoy speaks at the smart metering conference'. Below the video, there is a call to action: 'Follow the link to read the strategy'.

[Link to all documents](#)

Reminder: strategic objectives

- Help roll out smart metering quickly and efficiently to NHH customers – but in the right way
- To facilitate consistency of approach where both possible and beneficial
- Set out how Retailers and Wholesalers can work together to maximise smart metering benefits
- To make it as easy as possible for Retailers to access the data they need to develop products, services and tariffs, and support water efficiency
- Ensure traditional/AMR 'problem meters' that are not upgraded are also addressed



Potential benefits of smart metering



Accurate, timely, granular consumption data =

Improved service



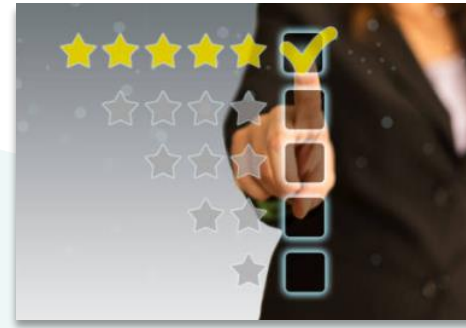
Timely, accurate NHH bills based on actual consumption

Innovation



New NHH products, services & tariffs

Competition



Opportunities for specialisation and differentiation

Water efficiency



Reduce NHH demand and water lost through leakage



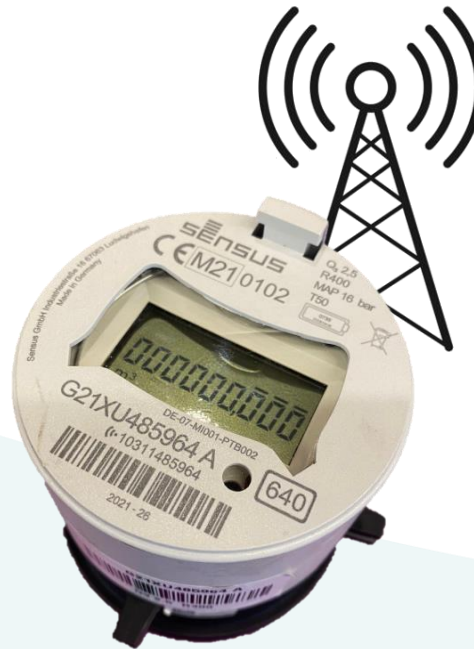
STRATEGIC PANEL & Committees

9%
Defra demand reduction target

Retailer and Wholesaler perspectives

Wholesalers

Focus: efficient rollout
Goal: water efficiency



Retailers

Focus: clarity & consistency
Goal: innovative products, services & tariffs



Water Report – initial reaction

- Shared interest in successful smart metering deployment
- Strategy a valuable ‘blueprint’ that helps companies to align voluntarily
- Huge shift in ambition around smart metering (for NHHs) since draft WRMPs
- Recognition of need for investment – and challenge for Ofwat
- While aim to bring as much consistency as possible, recognise rollouts won’t be starting from the same place
- Responsibility for putting smart reads into the market will sit with wholesalers
- “Huge step forward for the industry” both from customer and water saving perspective

THE WATER REPORT **COMPETITION WATCH**

SKIN IN THE GAME

Retailers and wholesalers have different, but aligned, interests in making the smart meter rollout a success, as their representatives on the Strategic Panel explain.

In March, the Strategic Panel published its *National metering strategy for the non-household market*. As we reported last issue, the plan seeks to bring consistency across the country as wholesalers embark on, or continue, smart meter rollouts in AMP8 and AMP9, while including recommendations for improving how companies' traditional metering stock is managed. The strategy aims to maximise rollout speed, efficiency and transparency by recommending a framework and identifying opportunities for standardisation among wholesalers, as well as addressing how wholesalers and retailers should work together, share data and provide a good level of service to customers.

The strategy was the product of extensive collaboration and engagement between MOSL, wholesalers, retailers and other stakeholders represented on the Strategic Panel and beyond. A little over a month on, one of the retailer and wholesaler representatives from the Panel that produced the strategy reflect on it and how it has gone down with the market.

Lucy Darch is chief executive of Wise. Until her term ended recently, she represented retailers on the Panel and played a very active role in the metering subset. Chris Offer recently joined Southern Water from Yorkshire Water as strategy and regulation director. He now represents wholesalers on the Panel.

Common interest
Talking to the two, it soon becomes clear that wholesalers and retailers come at the strategy from different places – they have different drivers, needs and priorities – but they have a common interest in a successful smart meter deployment, both for their own and each other's benefit.

Wholesalers, firstly, have balancing supply and demand and Defra's new consumption reduction targets front of mind. They need the rollout to be efficient and adequately funded through the upcoming price review. The nature of the non-household market makes it ripe for water efficiency interventions: businesses use 30% of the country's water, half of which is consumed by just 1% of customers.

From a Southern Water perspective, Offer says: "Metering strategy and water efficiency are absolutely at the core of the challenges that Southern Water has." While precise PR24 incentives are yet to be determined, finding more leaks and enabling customers to manage their usage using more granular information will be "critically important," he adds. "And from a wholesaler perspective, if this can help support the realisation of the benefits that were always intended when the market was initially opened, I think that's a great thing."

Retailers, on the other hand, want to offer new and better services to their customers. They need smart metering arrangements to be as consistent as possible between wholesaler regions, and to have clarity on what is happening when – not least to be able to communicate this to their customers. Darch comments

Ultimately, the retailer's job is to support the customer's needs. Customers will want to save money and be efficient with their spend in this area. Our job is to help them do that. At the moment... it is quite hard to manage a resource that you can't track. So once you're able to track your consumption, then I'd expect customers to get more engaged!

Engagement will increase as the price of water rises, she adds. So retailers' interests in helping customers cut consumption – particularly those in water scarce or costly to supply areas, or those who can be innovative with their water use by shifting the timing of their consumption or using non-potable sources – are aligned with wholesalers' objective to manage demand.

For both wholesalers and retailers, smart metering is a means to an end, and the onus is on them to use the data returned intelligently to secure their objectives.

Voluntary alignment
The national strategy does not have any statutory basis; in time, its detail is likely to be delivered through guidance, though code changes are a back stop if needed.

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THE WATER REPORT **May 2024** **31**

INTERVIEW | LUCY DARCH AND CHRIS OFFER, STRATEGIC PANEL

Darch says this is in tune with Ofwat's signalling that "we come up with our own solutions" rather than wait to be told what to do. She reflects: "Increasingly, as the market moves forwards, I think what we'll probably see is more innovation and collaboration [which are] less reliant on codes and licence conditions, but delivering really good results for customers."

She is optimistic that most trading parties will embrace the consistency the metering strategy offers. Each wholesaler doing its own thing on bilateral transactions in the NHH market proved inefficient and had to be respectively addressed. "The spirit of this strategy is really about, if we all agree that this strategy is a blueprint and agree to use it as we go forward, there's a better chance that we don't waste money...and that we know what to expect from each other."

Not everyone will follow the approach; as a comparison, not all wholesalers adopt the Retailer Wholesaler Group's good practice guidance. But "if you deviate from that, it might be that you're an outlier from where the rest of the market goes."

Growing enthusiasm

The strategy has been warmly welcomed by the market; the concept largely unchallenged in its high level positions. Offer expects more divergence of views once specifics come into play, but shares: "I don't think anybody wanted to jump into solution mode on some of this stuff straight out the gate." For now, he reflects: "From what I've seen and heard from others, I think we've pitched it about right. So I'm really feeling quite optimistic about it."

Darch adds that the market has come a very long way since wholesalers first published their draft Water Resource Management Plans (WRMPs). Many made little or no reference to smart metering for business customers in the first cut. "Wholesalers' smart ambitions were leaning towards households. At that time, Defra had a per capita consumption target, but they didn't have a non-household target...so I think it's really pleasing that we've now got a target from Defra for 9% for non-household reduction. We've seen a huge shift in the ambition around smart

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through the updated WRMPs. All these things feel like they're galvanising support in the right direction for something which wholesalers and retailers all believe is the right thing."

So are wholesalers universally backing smart metering now? Signalling from Defra, Ofwat, the Environment Agency, MOSL and the Strategic Panel has certainly encouraged them to do so. Offer says: "I think, absolutely, there's been a shift... We've often talked about having a twin-track approach to water resources. That's never felt more true."

But clearly for some companies, particularly those with serious water resource challenges, getting smart metering right is more urgent. Offer knows this from his move from Yorkshire – where water resource planning was a medium to long term matter and to some extent about using surplus water effectively – to Southern Water, which has "gone through a journey of turning over every stone and considering every option available to address the underlying water resources challenge... The requirements on Southern essentially mean that it's going to have to offset around a third of its daily resource... to support restoring sustainable abstraction. That is massive. And so every option is absolutely on the table."

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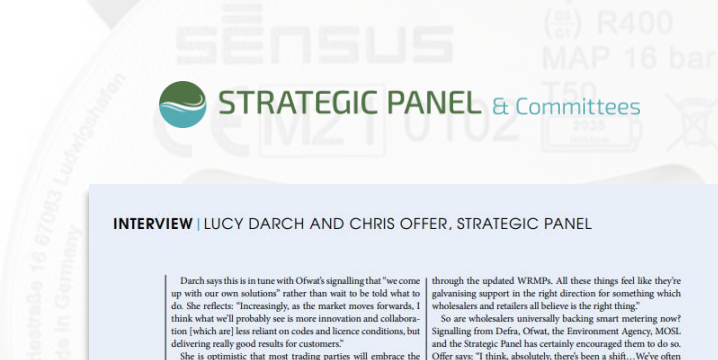
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You'd imagine the wholesalers will be very tempted to do their rollout street by street, it makes absolute sense doing it geographically. But retailers might want to pull out certain large consumers

32 May 2024

THE WATER REPORT



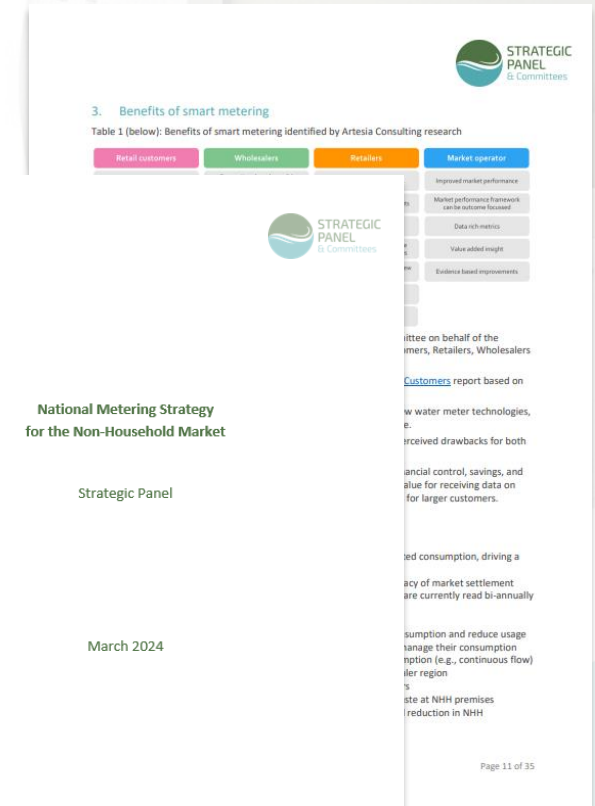


Supporting delivery of the strategy

- Launch phase now
- Strategy sets out first steps – the “what” and “who”; more work to do
- Ofwat plays key role: Final Determinations, design of Price Control Deliverables (PCDs), monitoring, etc
- Metering Committee and MOSL will work with trading parties to deliver
- Strategic Panel will monitor progress
- Industry appetite to engage and get this right

Trading Parties' reaction to strategy?

- How has the strategy been received?
 - Are there issues you strongly support
 - Are there issues that need strengthening or more development?
 - Is there anything missing?
 - Would a survey be appropriate so that trading parties can respond?

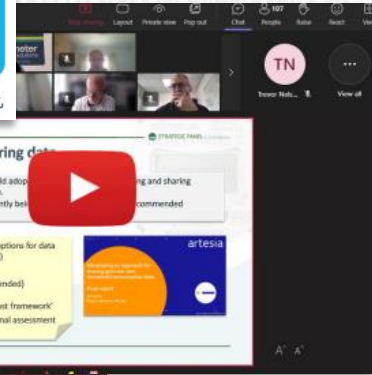
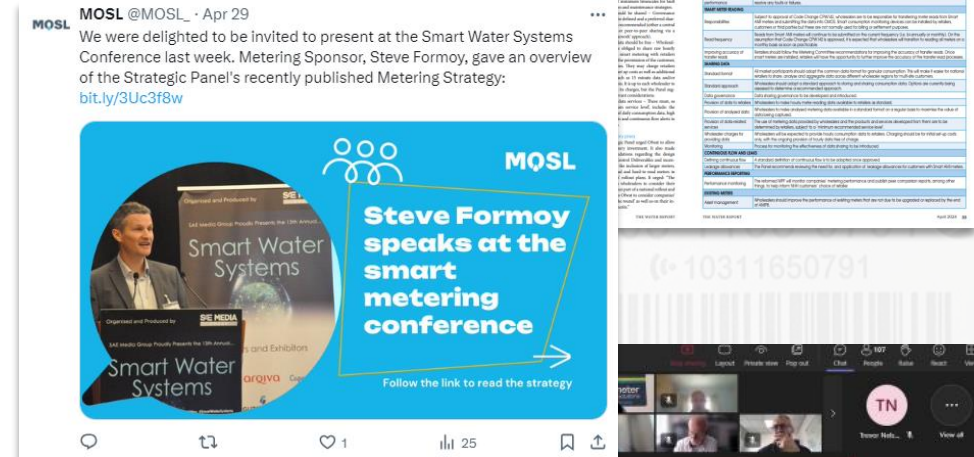




Questions

National Metering Strategy

- Strategy published on 27 March
- Webinar on 18 April very well attended (110+) & good engagement
- Strategy downloaded 830+ times
- Webinar slides and recording downloaded 150 times
- Communications:
- Strategy issued widely via Mailchimp + reminder re-issue
- Strategy issued to national media
- Multiple social media announcements
- Water Report feature in April
- Follow-up feature in May based on Subset interview
- Focus of presentation at Smart Water Systems Conference
- Ofwat's Draft Determination due to be published in June



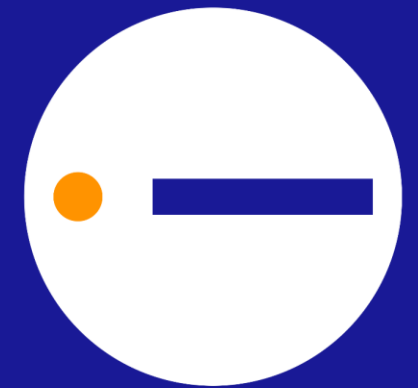


artesia

Developing an approach for sharing granular data

MOSL User Forum
15th May 2024

Dene Marshallsay & Dave Gough

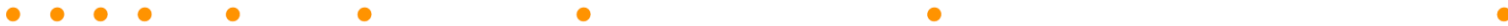


Summary of the final report and recommendations

1. Introduction
2. Requirements for granular data sharing
3. Potential options for sharing granular data
4. Roadmap and recommendations



Introduction



Project context and tasks

Why is this project needed?

A fundamental aspect of the metering roadmap is to make granular consumption data available to all who need it.

Water Resource Management Plans (WRMPs) and PR24 business plans show that most water companies are planning to roll out smart metering to NHH customers over the next 5-10 years.

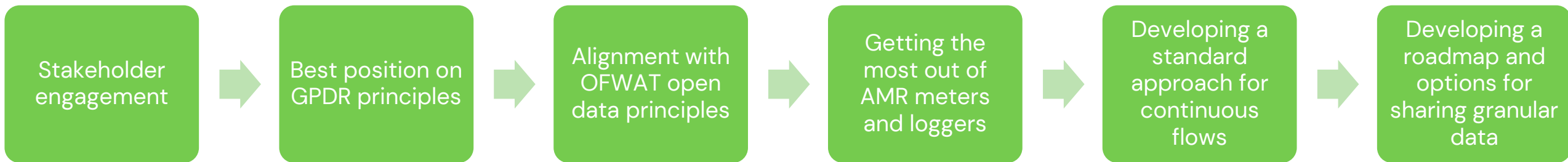
The ability to share granular smart meter data market stakeholders will enable a range of benefits for retailers, wholesalers, end customers and MOSL.

To meet this requirement, MOSL has identified the need to develop a robust mechanism for sharing granular consumption data in the market, that addresses key issues such as GDPR and open data principles.

Smart meter data sharing is already active in the market. Anglian Water and Thames Water both have data sharing systems in operation utilising smart meter data to help with business operations including water efficiency and leakage interventions.

This report develops a roadmap for sharing granular data in the market. It identifies several potential options for sharing data. There is still some uncertainty over the pace and scale of smart meter roll-out, which will become clearer as the wholesalers' business plans are finalised.

However, there is some urgency to develop a preferred solution as wholesalers and retailers need to invest in systems development as their smart meter roll-out programmes progress.



Potential benefits of accessing granular data and data access needs

Retail customers

- Improved service
- Bills based on valid consumption
- Value added services
- Water efficiency opportunities
- Fewer bill shocks
- More informed choices

Wholesalers

- Transactions based on valid consumption
- Greater visibility of property level consumption
- Ability to target leakage and wastage reductions
- More accurate consumption data for regulatory reporting
- Improved management of meter assets
- Benefits align with household metering

Retailers

- Fewer customer complaints
- More accurate cash settlements
- Improved cash flow
- Scope to innovate and provide customers with additional services
- More confidence in taking on new customers
- Reduced cost to serve
- Fewer stranded assets

Market operator

- Improved market performance
- Market performance framework can be outcome focussed
- Data rich metrics
- Value added insight
- Evidence based improvements
- Inputs to CMOS

Data access needs:

- Hourly data
- Aggregate data

- Hourly data
- Aggregate data
- Derived data
- Meter diagnostic data

- Hourly data
- Aggregate data
- Derived data
- Spot readings

- CMOS monthly
- CMOS spot reads
- MOSL Aggregate data
- MOSL Derived data

Requirements for granular data sharing



Smart meter data providers are currently the wholesalers but could also include retailers.

Currently two wholesalers are actively sharing granular data, the number of smart data providers could increase to include all wholesalers and all retailers.

End users of granular smart meter data potentially include:

wholesalers, retailers, 3rd parties (for example water efficiency service providers), non-household customers, and MOSL.

Data to be shared could include granular data (hourly or daily), derived data such as continuous flow, alarm data, along with meter ID and SPID data.

The need for the system to grow to meet demand.

Currently only Thames and Anglian Water are rolling out smart meters in non-households at scale. But all other wholesalers have plans to do the same over the next 5 to 10 years.

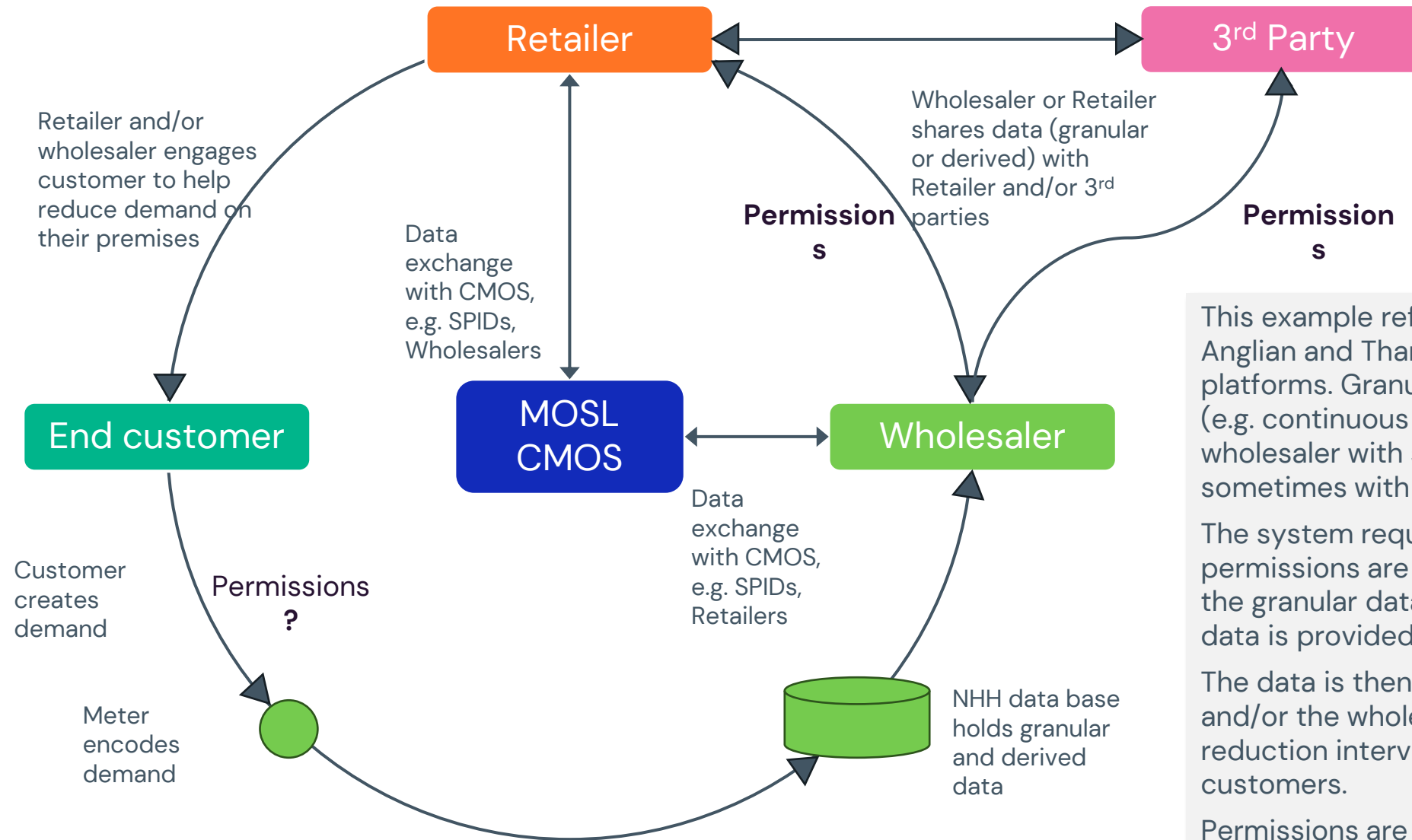
Interoperability,

i.e. the right standards need to be in place to allow parties to share and gain access to granular data in common formats and through common data sharing systems

The necessary **permissions** need to be in place to allow data to be shared and accessed.

Governance processes will need to be established to manage issues like this.

Example of data flows and options for sharing granular data to support demand reduction



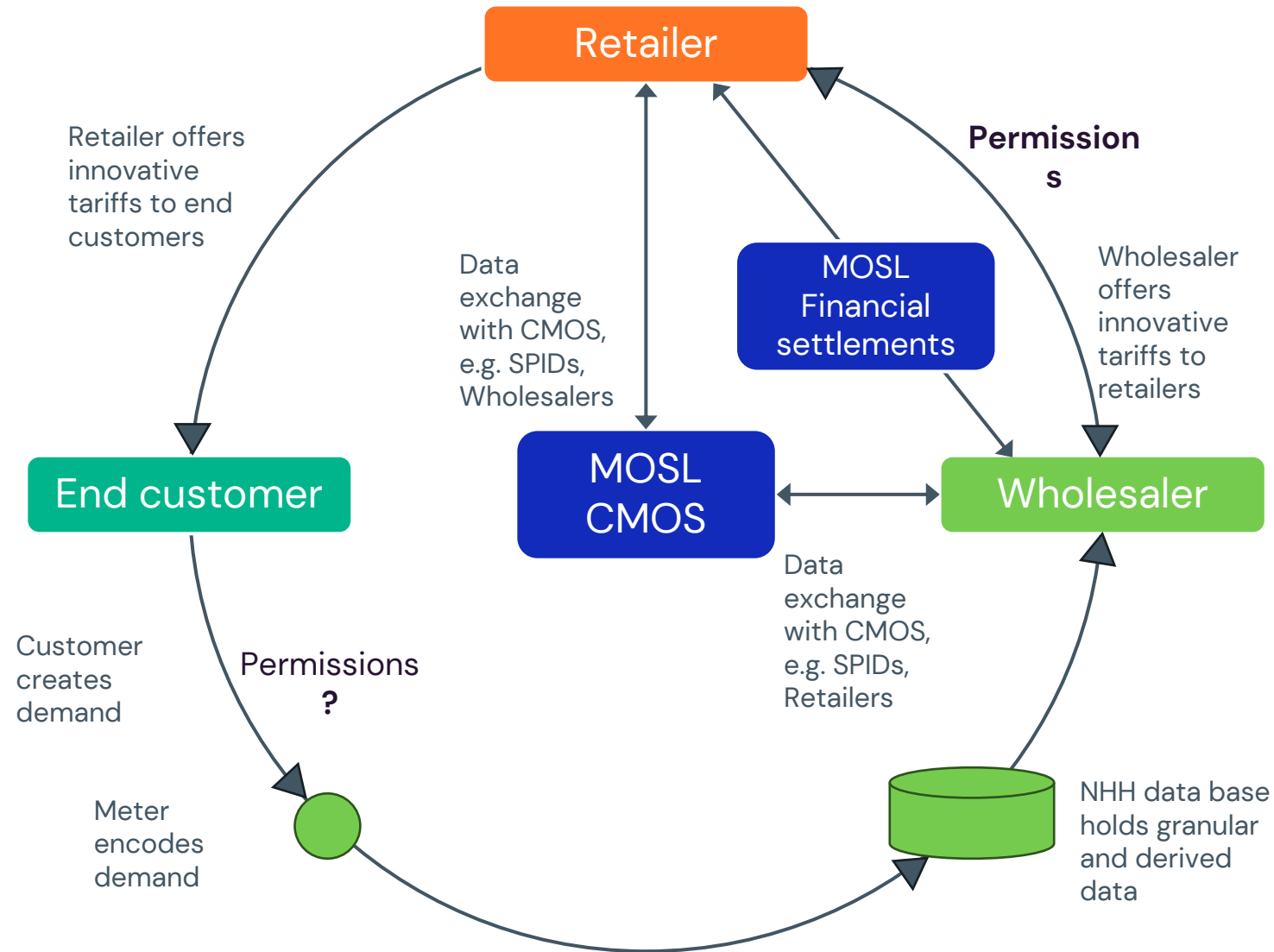
This example reflects the processes in the Anglian and Thames granular data platforms. Granular and/or derived data (e.g. continuous flow) are shared by the wholesaler with specific retailers, and sometimes with 3rd parties.

The system requires that the correct permissions are established for access to the granular data, and then access to the data is provided.

The data is then used by the retailer and/or the wholesaler to target demand reduction interventions to specific customers.

Permissions are not currently required from end customers, but this could change in the future, and needs to be considered in future plans.

Data flows and options for sharing granular data to support innovative tariffs



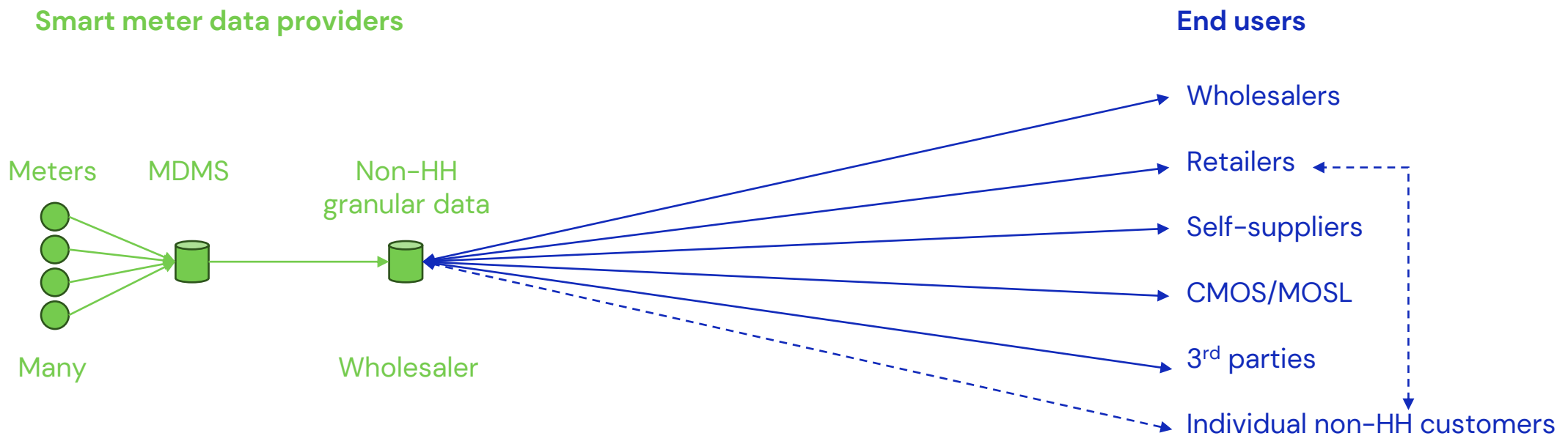
This example shows a possible process for sharing granular data to implement innovative tariffs in the future. Innovative or smart tariffs have the potential to drive different behaviours (such as water saving behaviours) and to provide flexibility to support vulnerable or critical customers. As in the previous example the correct permissions need to be established between the wholesaler and the retailer. In this example the granular data will be used to determine settlements between the two parties, therefore there will be a further set of requirements to satisfy the needs of MOSL as market operator. This may include things such as timeliness of data and data retention periods.

Potential options for sharing granular data



Option 1: "Organic Growth"

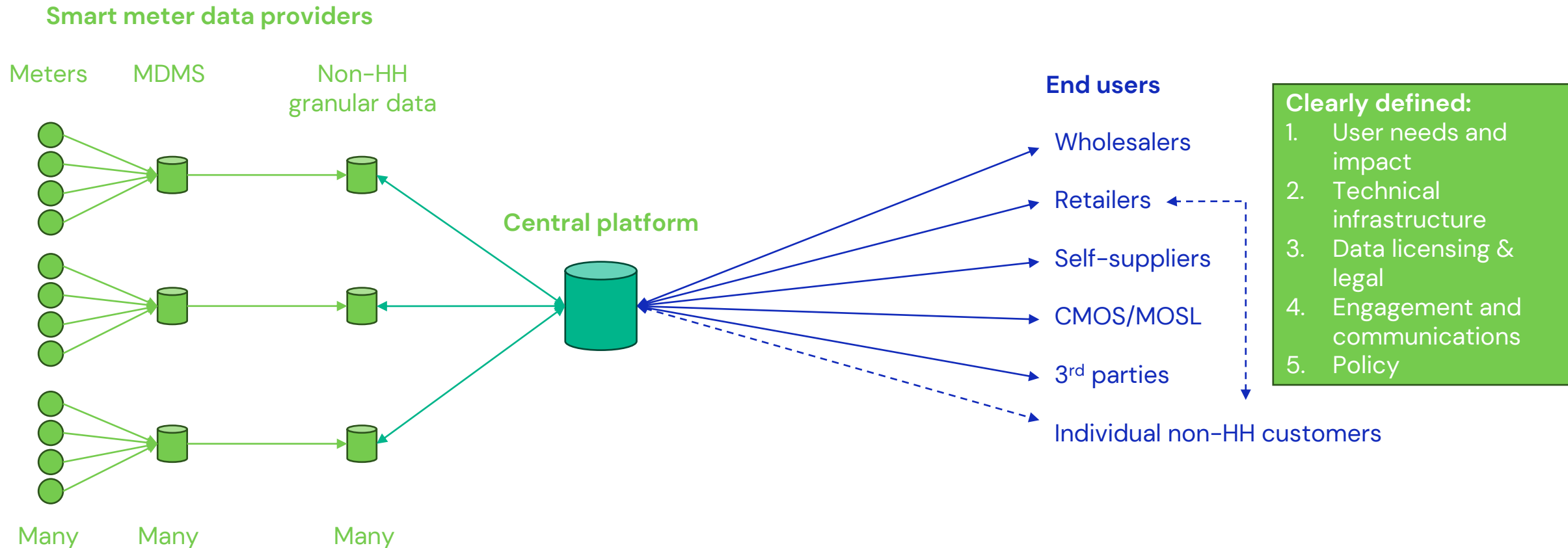
Wholesalers store customer data in their systems and develop individual data sharing processes, with 'light touch' governance, as necessary.



Based on the systems developed by Anglian Water and Thames Water.

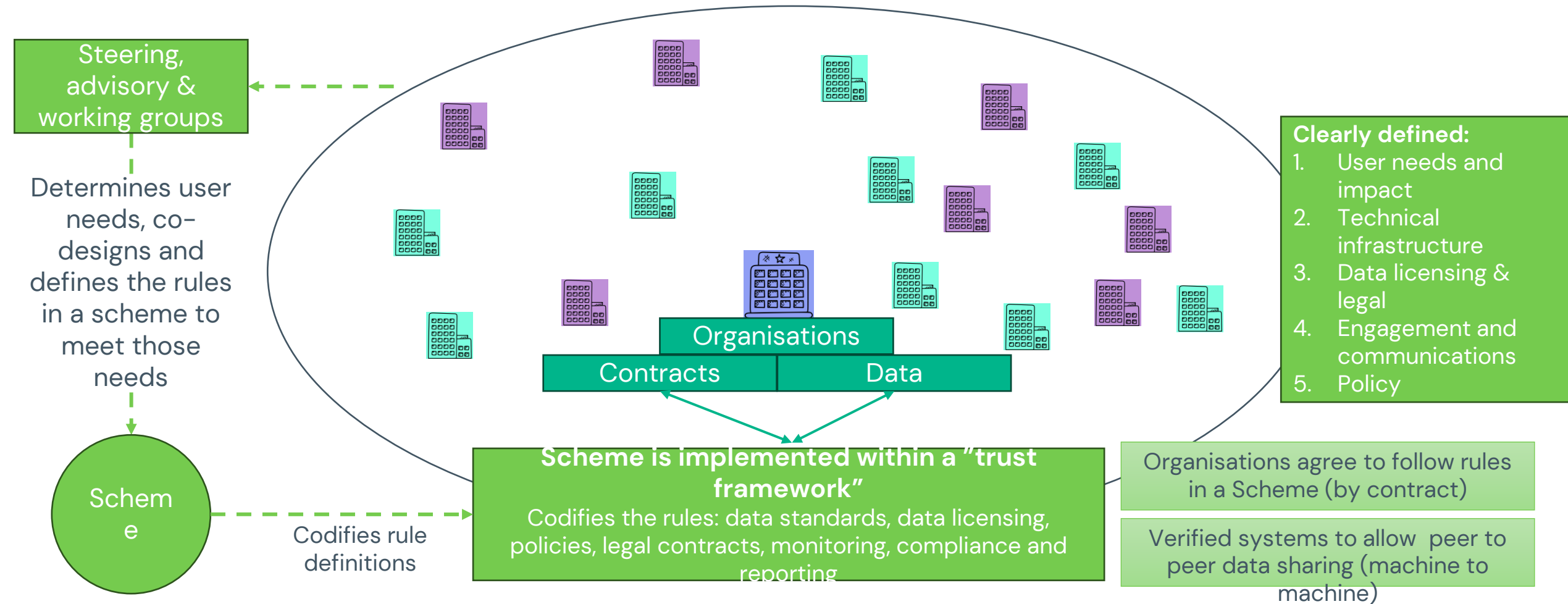
Option 2: “Central platform”

A single, central data ‘hub’ is developed by a third-party, in which all consumption data is held and shared with the relevant parties.



Option 3: Peer to peer data sharing with central control & governance

Peer-to-peer sharing – data is shared based on an agreed set of rules (i.e. a 'trust framework' similar to on-line banking).



Summary of options

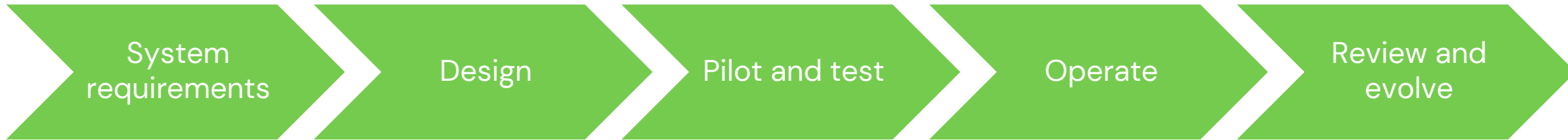
Option 1: Organic growth	Option 2: Central system / data hub	Option 3: Peer to peer data sharing
<p>Wholesalers store customer data in their systems and develop individual data sharing processes, with 'light touch' governance, as necessary.</p>	<p>A single, central data 'hub' is developed by a third-party, in which all consumption data is held and shared with the relevant parties.</p>	<p>Data is shared based on an agreed set of rules (i.e. a 'trust framework' similar to on-line banking).</p>
<p>Pros: currently being used, it builds on existing assets and is allowing the sector to test granular data sharing.</p>	<p>Pros: Clarity of process, simplicity of access and centralised governance.</p>	<p>Pros: Governance via trust framework, interoperability, adaptability and flexibility; it focusses on connecting data not collecting data. Follows open data principles.</p>
<p>Cons: currently the two systems have different means of access and rules. As the number of systems increases, it has the potential to become complex and light touch governance may be problematic.</p>	<p>Cons: It could take time to develop and have less adaptability or flexibility to grow as the NHH smart meters roll out. Existing data providers' platforms become redundant. May be additional costs in linking to a variety of different proprietary data provider systems</p>	<p>Cons: Can be perceived as complicated, may provide a challenge for some users to access and understand.</p>

Full life costs for options to share granular data should be developed

High level full life costs will need to be developed to aid in the decision-making process for selecting the optimum option to take forward for granular data sharing.

The costs should include the development of requirements, building, testing, operations and review and future evolution; set out in the schematic below.

Cost should consider the pace of adoption of smart metering in the non-household sector. This is still unknown but will become clearer when wholesalers' business plans for AMP8 are finalised (December 2024).



This should consider:

- Governance
- Interoperability
- Specific use cases
- Scale of data storage and access
- Smart meter roll out plans
- Growth of parties accessing data

This should consider:

- Governance
- Design approval
- Detailed economic, legal, policy and technology design
- Growth. Currently there are two wholesalers sharing granular data. This will grow over time.

This could be done on two specific use cases:

- One which shares granular data between wholesalers, retailers, 3rd parties and end customers.
- One which uses granular data to set financial transactions, e.g. smart tariffs.

This should consider:

- Leadership and governance
- Operational monitor and review
- Community engagement and support

Overtime there will be a growth in users and growth in use cases and needs. This should include a process for reporting, reviewing and recommending actions, so that the system can evolve as the use in granular data expands.

Use cases should be developed for each data sharing application

Use cases start to define the **why, who, what and when** of sharing granular non-household data.

These can then be used to prioritise specific developments and more detailed user requirements.

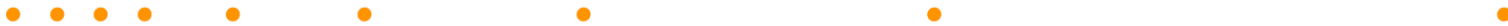
The draft use cases developed in this report are:

- Continuous flow for demand reduction.
- Innovative tariffs.
- Monthly reads for CMOS.
- On demand reads for settlements.
- Night flows for DMA leakage calculations.
- Understanding consumption at property level.
- Long term planning.

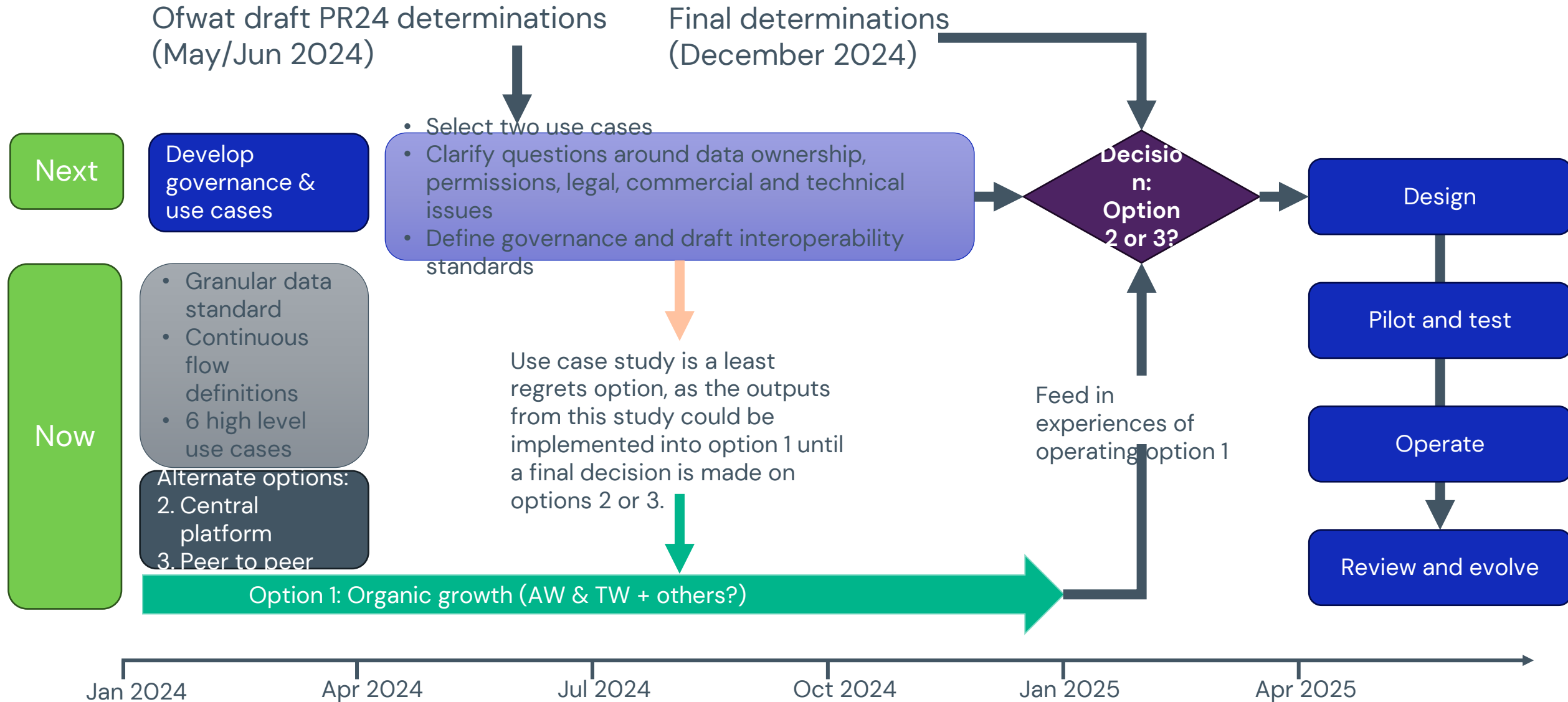
An example is shown on the right:

Use case:	Continuous flow for demand reduction
Why is the data required?	Continuous flow (see section 6 for definition) allows the user to identify potential water leaks or wasteful water use on a customer's premises. This allows customers, wholesalers or retailers the opportunity to reduce demand on this property and save water.
Who requires the data?	Potentially one or more of the following: <ul style="list-style-type: none">• Wholesalers• Retailers• Self-suppliers• Customers• 3rd Parties (acting on behalf of one of the above, e.g. those providing water demand reduction services).
What data is required?	For a specific property/customer, either: <ul style="list-style-type: none">• Hourly data to allow continuous use to be calculated• The value (flow rate) of the continuous flow Plus: <ul style="list-style-type: none">• SPID• MeterID
When is the data required?	On demand
What permissions are required?	Wholesalers – if the premises is supplied by the wholesaler. Retailer – if the premises is an existing customer. Self-supplier – if the premises belongs to the self-supplier. Customers – if it is a legitimate customer for the premises. 3 rd Parties – permissions needed from one of the above.

Roadmap and recommendations



Adaptive roadmap for sharing granular data



Recommendations

There is some urgency to develop a preferred solution as wholesalers and retailers need to invest in systems development as their smart meter roll-out programmes progress.

The key recommendation is to continue with a stream of work to develop specific areas common to each of the options, and to facilitate a decision on the most appropriate option. There are two broad areas to address:

- a) Governance**, to identify the rules and needs around who needs access to what data, what permissions are needed, GDPR and legal requirements, interoperability and open data needs.
- b) Develop two use cases** (one on sharing data to support water saving and one to support smart or innovative tariffs), to test the rules and needs on specific use cases, and to develop a better understanding of whole life costs.

These two areas should be developed before the end of 2024.

The findings from these can then be combined with the outcomes of the final business plan determinations, and the continued learnings from the current TW and AW systems to recommend a preferred solution for sharing granular data.



Managing deferrals in bilateral requests

Axelle Saada

Market Assurance Manager, MOSL

15 May 2024



Permitted reasons

Requests and/or actions of a Retailer or their Customer

- Requests to attend outside normal working hours, weekends, bank holidays or outside the Operational Performance Standard timescale.
- Requests by the customer to commence the work later than intended by the wholesaler.
- Awaiting confirmation of further information not provided in the original Retailers request or acceptance to proceed with the work.
- Inability to contact a Retailer and/or their customer over 3 consecutive days to arrange an appointment.
- Awaiting completion of enabling works by the customer to proceed with the work.

Permitted reasons

Requests and/or actions of a third party / agency consents

- Private land or road access – official land entry request should be promptly started by the Wholesaler.
- Highway Authority section 58 notice, permit or lane rental restrictions and/or temporary traffic regulations orders lead times - official process should be promptly started by the Wholesaler.
- EA Liaison over trade effluent consents.
- Powers to gain a warrant for entry legal route - official process should be promptly started by the Wholesaler.

Permitted reasons

Water quality and other regulatory constraints

- Water quality activity including water quality sampling requirements.
- Contraventions of the water fittings regulations.

Permitted reasons

Extreme weather event or national event causing impact to infrastructure and/or operations (Force majeure)

- Extreme snow or ice preventing access.
- Extreme flooding preventing access.
- Water Company under official drought conditions.
- Pandemic restrictions/resourcing impact
- National Fuel shortage.
- Foot and mouth disease restrictions.
- Bird Flu restrictions.
- Weather Conditions – Met Office Red Alert.

Processes and controls

General processes

- Fostering a collaborative approach with retailers, not relying solely on the bilateral hub for communication.
- Proactively reviewing SLAs that have been deferred and ending deferrals as soon as possible after the permitted reason which justified the deferral is no longer relevant; this can be done through daily priority reports involving senior management.
- Creating a focus group within the company which will work on resolving requests that have been delayed past a certain threshold.

Processes and controls

Setting start and end dates

- Providing a realistic end date for deferrals where possible.
- Limiting the backdating of deferrals' start dates to instances where the wholesaler has been working on the SLA since that start date and has only confirmed the need for a deferral later; deferrals should not be backdated when there have been any delays in progressing the SLA. For example, if a wholesaler requests more information from the retailer on day 3 of the SLA, the wholesaler should use day 3 as the start date of the deferral. The missing information was not available from day 1. However, the wholesaler could have reduced the number of days incurred by requesting more information from the retailer sooner.

Processes and controls

Controls

- Keeping operational agents' skills and knowledge up-to-date, especially when there is a change in staff or team structure.
- Implementing internal ORID spot checks that not only verify that there haven't been any clear mistakes in following the company's process, or that the ORID has been resolved overall, but that reviews the evidence for the permitted reason invoked and checks that the start and end dates of the deferral match the timeframes of the permitted reason.

**Debate – Do
Wholesalers and
Retailers need
guidance on
Deferrals?**



RWG Update

Ray Porter and Mike Rathbone
RWG

MOSL

An abstract geometric pattern composed of various sized triangles in shades of teal, light blue, dark blue, and purple, arranged in a complex, overlapping fashion on the right side of the slide.

RWG Andrew Bamber Award for 2023

***Outstanding Contribution to the Retail
Market***

***Get voting for your top 3 – closes 29th
May 2024***



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