

MOSL

User Forum

Online

**Hosted by
Markus Lloyd and Tom Daborn**

10 Sep 2025



Agenda



Item	Description	Who	Time
1	Introduction and Welcome: MOSL	Markus Lloyd and Tom Daborn	15:00 – 15:05pm
2	RWG: update	Fallon Wilkinson	15:05 - 15:15pm
3	Change: update	Sayonee Nandi	15:15 - 15:35pm
4	REC Responses	Lyv Nabarro & Jane Andrews	15:35 – 15:50pm
5	NEW: Training Days	Jakub Jager	15:50 – 16:00pm
6	Business Continuity and Resilience Group	Angela Day	16:00 – 16:10pm
7	Closing	Markus Lloyd and Tom Daborn	16:00 – 16:15pm

10 September 2025

RWG update



Sub-group highlights

Bilaterals

- Draft Bilateral Hub forms for the Good Practice Guide (GPG)
- Scope and propose enhancements to Bilateral Hub
- Develop bilateral common processes GPG
- Additional retailer members needed

Customer Contact Details

- Initiating code change proposal

Drought

- Fortnightly Drought forum to ensure alignment between wholesalers and retailers
- Finalise drought communications GPG when current drought situation has subsided



Sub-group highlights

Settlement

- Development of a GPG will commence once Ofwat's decision is confirmed
- Working group being set up to look at retrospective amendments
- Exploring potential Market Improvement Fund bid (partnering with a third-party organisation) to develop a market calculator

Smart Meter Roll Out

- Smart Meter Roll Out Communications GPG anticipated to be published w/c 8 September

Water Efficiency

- Baringa Research findings – incentives for water efficiency



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
- To find out more about RWG please email 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

Code Changes

Sayonee Nandi
MOSL

10 Sep 2025



Change Proposals/Reports (already gone to CCC)

Title	Summary	Stage
13 August 2025		
MPF Reform Part C – KPIs Phase One (CPM058 & CPW149 'c1')	Priority Cyclic Read KPIs including M01, M02, M19 and Transfer meter read KPIs M04 and M06 and the additional metric of M09.	Recommend
CMOS Data Retention Beyond Seven Years (CPW157)	Proposes to extend the period that data is retained in CMOS beyond the current seven years. This will provide a reference when resolving historical billing disputes and ensure no impact on settlement when historical reads are deleted.	Update
Smart AMI Meter Definition (CPW163)	Seeks to define what a commissioned smart meter is and when to use the SmartAMI descriptor in CMOS	Recommend

*As of 09/09/2025

**Subject to re-prioritisation

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



Title	Summary	Stage
17 September 2025		
Smart Meter Read Hub Phase 2(CPM064 & CPW165)	Seeks to mandate wholesalers to utilise the Smart Meter Read Hub (SMRH) for smart meter read data sharing so retailers can have a consistent way to access such data from wholesalers. It also seeks to Integrate the SMRH with CMOS to enable retailers to efficiently submit smart meter reads from SMRH into CMOS.	Pipeline
Data/report Requests of the Market Operator(CPM061& CPW158)	Seeks to align the market codes with legislation, clarify when the Market Operator can provide data to public bodies and under what governance.	Recommend
Third Part Access to Consumption Data(CPM060 &CPW156))	Seeks to introduce a mechanism for reviewing and, where approved, facilitating requests for consumption data from third-parties.	Recommend

*As of 09/09/2025
Dates for changes with PIP references are estimated.

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



Title	Summary	Stage
	14 October 2025	
Smart AMI Meter Definition (CPW163)	Seeks to define what a commissioned smart meter is and when to use the SmartAMI descriptor in CMOS	Recommend
Deductions and Withholdings Under Dispute Process(CPM054.R1 & CPW145.R1)	Seeks to bring the deductions and withholdings currently allowed by Section 9.7.2 of the Business Terms under the formal Disputes Process	Design
Third party requests to wholesalers(CPW161)	Seeks to require wholesalers to engage directly with third parties making requests on behalf of customers e.g., to install a datalogger.	Post Consultation

*As of 09/09/2025

**Subject to re-prioritisation

Trading Party requests in next 3 months*

Title	Engagement type	Date
Data Retention Beyond 7 Years (CPW157)	Consultation	04 Dec – 29 Jan 2026



*As of 09/09/2025

Awaiting Ofwat Decision*

Title	CCC Recommendation	Decision Due	Implementation
Wholesaler MPS Charges Discontinuation(CPM062 & CPW160)	Majority Early Rejection	N/A	
Cost Recovery Mechanism(CPW153 & CPM063)	Unanimous Recommendation	12 August 25 (Delayed)	TBC
Initial Cost Support(CPW154)	Unanimous Recommendation	22 August 25(Delayed)	TBC
Data Quality Assurance Flags(CPW155)	Majority Recommendation	08 Oct 2025	11 May 2026
MPF Reform Part C - KPIs Phase 1(CPM058 & CPW149 'c1')	Unanimous Recommendation	10 Nov 2025	1 December 2025
Post RF Customer Refunds(CPW152)	Majority Recommendation	26 Sep 2025	13 March 2026
Bilaterals Phase 15 (CPW139i) Clarifications (CPW164)	Recommendation delegated to MOSL	17-Nov-25	16-Dec-25

*As of 09/09/2025

Implementing*

Title	Central System Impact	Code Release Date
Bilateral Hub (Additional enhancements part 4.)(CPW139i)	Y	16 December 2025
Bilateral Hub(CPM051 & CPW139)	Y	16 December 2025



*As of 09/09/2025

Implemented in Last Month*

Title	Central System Impact	Date of Release
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Retail Exit Code

Overview of MOSL and Panel responses to Ofwat Retail Exit Code (REC26) consultation

Lyv Nabarro and Jane Andrews

10 September 2025



The Retail Exit Code

The Retail Exit Code (REC) sets out the price and non-price protections for customers in the business retail market.

1

Group One - an allowed cost to serve (including allowed costs for meter reading and bad debt)

2

Group Two – a gross retail margin (separate for water and sewerage)

3

Group Three – no price protections



Ofwat's REC consultation

Consultation closed Monday 8 September.

Ofwat consulted on the form of protections for different customer groups.

The last consultation took place in 2022 (REC22) with notable uplifts in allowed costs to serve, however, an overall reduction in retail margin.

Key areas of the REC26 consultation include:

- Consulting on the definitions and boundaries of customers and customer groupings
- Consulting on the form of price protections including alternative approaches, such as tether ratios, 'must offer' tariffs, fully fixed allowances etc.
- Consulting on ways to remove the disincentive for water efficiency

MOSL's REC response

Overall supportive of the approach to retain current price protections, but note:

 Define a clearer pathway for loosening protections

 Take account of wider market developments

 Recognise diversity in customer costs to serve

 Adopt a more agile approach

 Simplify and clarify protections

MOSL's REC response

The main ask in our response is for Ofwat to set out a clearer pathway to enable a gradual and cautious move away from price protections:

Customer Group	Consumption (ML/Y)	SPID count	Switch Rate
Group 1	0.0	217,490	11.82%
	0.0-0.1	580,344	20.17%
	0.1-0.2	160,484	23.68%
	0.2-0.3	90,228	23.62%
	0.3-0.4	53,815	25.78%
	0.4-0.5	37,272	27.94%
Group 2	0.5-0.6	31,387	27.15%
	0.6-0.7	21,669	30.66%
	0.7-0.8	18,007	33.00%
	0.8-0.9	14,352	33.50%
	0.9-1.0	12,373	33.12%

*Consumption of Group One and Group Two customers with associated SPID counts and switching rates since market opening

MOSL's REC response



Customer Group	Consumption (ML/Y)	SPID count	Switch rate
Group 2	0.5-0.6	31,387	27.15%
	0.6-0.7	21,669	30.66%
	0.7-0.8	18,007	33.00%
	0.8-0.9	14,352	33.50%
	0.9-1.0	12,373	33.12%
	1-2	62,238	37.75%
	2-3	22,883	42.37%
	3-4	11,439	45.13%
	4-5	6,545	49.00%
	5-10	12,176	50.10%
	10-20	5,188	53.82%
	20-30	1,560	55.45%
	30-40	710	59.72%
	40-50	418	52.63%
Group 3	>50	1,609	54.26%

*Consumption of Group Two and Group Three customers with associated SPID counts and switching rates since market opening

Strategic Panel REC Response

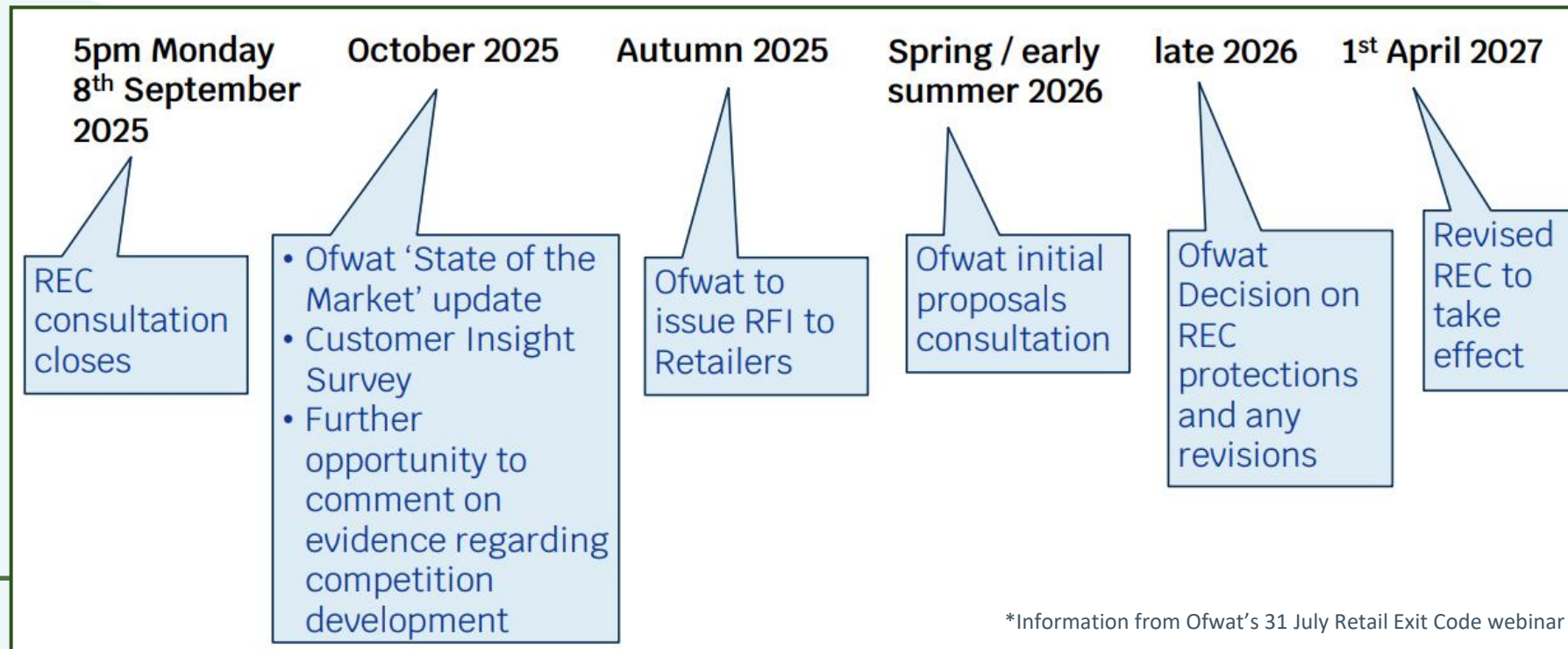
- A Strategic Panel sub-set led the development of its consultation response, with input provided from the wider Panel
- An Industry Workshop held on 20 August provided an opportunity to explore key issues raised in Ofwat's consultation. Feedback from attendees was incorporated into the final response
- The Strategic Panel's REC response addresses seven key themes:
 1. **Ensure the protections are proportionate to the harms being protected against**
 2. **Protections should be forward looking**
 3. **A more dynamic approach to advance customer benefits**
 4. **A broader strategy is needed to support market evolution**
 5. **There is a need to look at other markets**
 6. **A more cost reflective approach with a safeguard cap**
 7. **The current approach is not the only way to maintain simplicity**

Points of difference from MOSL response

- The Panel and MOSL responses were developed independently, though both share several key points of alignment
 - Key points of difference between the responses include:
 - The Panel expresses in principle support for a ‘must offer’ tariff as a future step toward removing price protections (MOSL notes this, but is not a key theme)
 - The Panel references inconsistencies between customer groups, namely that Group Two has a lower water gross margin than wastewater—which is the opposite for Group One customers (Not in MOSL response)
 - The Panel advocates for a cost-reflective approach through a safeguard cap, aimed at protecting customers without discouraging retailer engagement (MOSL focuses more on provision for unique customer characteristics and associated costs)
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Next steps

- Both Panel and MOSL responses are published on the MOSL website
- Further input expected in autumn following publication of Ofwat’s State of the Market report (views invited in November)



*Information from Ofwat’s 31 July Retail Exit Code webinar

Training Days

Jakub Jager

Market Operations Analyst

10/09/2025



MOSL's Training Day

- Following feedback from both our senior engagement meetings and survey, MOSL is running its first training day

What is it?

- In-person training and networking opportunity hosted by MOSL in our offices in Southampton

Who is it for?

- Opportunity for both new and existing operational employees to hear from MOSL subject matter experts on the current operational services and processes.



MOSL's Training Day

- Any concerns and ideas raised will be collected and shared with relevant teams within MOSL after the Training Day
- Focus will be on on the current operational services and processes



MOSL's Training Day

When – 19th of November 2025

Agenda

- Settlement: 'As is' and "What's coming".
- Market Audits: Why we need them and our findings
- MOSL Website and Engagement
- Holistic and R-MeX Performance
- Accessibility to Market Systems

Plus, this is a chance to...

- Meet your peers and MOSLers
- MOSL office tour

If you or a member of your team would like to attend this training, please confirm your attendance along with any dietary or accessibility requirements to comms@mosl.co.uk by Friday 17 October 2025.



Thank you

Any Questions?



Business Continuity and Resilience Group

**Angela Day, Head of People, Risk
and Compliance**

Presentation to the User Forum

10 September 2025



Workshop purpose

To test a variety of MOSL system outage scenarios in order to:

- Enable MOSL to understand your issues and responses
- For you to test your business continuity processes

As we step through the scenarios we will explore:

- What is the impact?
- What problems would it create?



Scenarios tested

**CMOS Outage
(Business Days 1-4)
Critical database failure**



**CMOS Outage
(Business Days 4- 19)
Cryptolocker ransomware**



**Bilaterals Outage (5 days)
Faulty Vendor Patch**



CMOS outage considerations

- Data loading backlog
- Settlement running inability
- Unplanned Settlement Runs
- Customer switching
- Unavailability of MDS Reports

Bilaterals outage considerations

- Inability to execute transactions impact
- Delay to SLAs

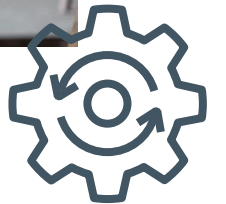
Business Continuity and Resilience Group

Aims of the group

Improve the business retail market resilience by facilitating collaboration on business continuity planning and jointly testing responses to key operational and market related threats

Objectives of the group

- Share best practices in business continuity and operational resilience
- Explore common risks that may impact multiple participants (e.g., system outages, data incidents, and potentially trading party failure)
- Test incident scenarios and simulate coordinated responses
- Promote a culture of mutual support and transparency between market participants relating to resilience



Business Continuity and Resilience Group

Governance

- This would be a sub group of the ORWG
- The group would meet quarterly, for two hours and be open to all trading parties to attend
- Outputs and materials from the meetings would be made available for all trading parties to view
- MOSL would Chair the meetings and propose agenda items but attendees would be invited to submit agenda items that fit within the overall objectives of the group
- This group would not sit formally under the Strategic Panel or Committee's or the MOSL Board but MOSL would, in addition to sharing outputs with trading parties, provide updates to the MOSL Data and Digital Committee and Audit and Risk Committee



Business Continuity and Resilience Group

Areas for Consideration

- Time and Resource Commitment
- Investment versus Value
- Information Sensitivity
- Scope Creep

Thank you – I welcome your feedback on the proposal to establish this group



MOSL

AOB And Close

