

# Market Focus

News from the  
heart of the market



Upfront | New and Notable | Improvement Programmes | Industry Speaks | In Every Issue

## Welcome to the March edition of Market Focus

Market Focus is MOSL's monthly publication to our members, bringing you the latest updates from our improvement programmes and events, as well as industry insights and news stories from the business water market.



### 03 **Upfront**

A message from Steve Formoy, Finance Director

### 04 **New and Notable**

Dates for your diary  
Business Plan update  
Trading Party Survey: You said, we did  
New Wholesaler Director appointed to the MOSL Board  
Independent Commission Call for Evidence  
New Trading Party Entrants: FCC Environment and InterGen  
Applications fly in for Market Improvement Fund Round Four  
Record Number of retailers participating in latest R-MeX  
CCW and Ofwat Forward Work Programme responses

### 10 **Improvement Programmes**

Data Assurance Service  
Market Performance Framework Reform  
Bilateral Transactions Programme  
Modernisation of Market Systems  
Strategic Metering Review

### 14 **Industry Speaks**

RWG Corner  
Strategic Panel update

### 16 **In Every Issue**

Change updates  
Monthly market statistic  
CMOS transactions  
Behind the Mailbox - Annie Boskova  
MOSL on the Move

**Upfront** | New and Notable | Improvement Programmes | Industry Speaks | In Every Issue

## A message from Steve Formoy, Finance Director

Welcome to March's edition of Market Focus.



This month is quite significant as we gear up to the introduction of the new Market Performance Framework (MPF) shadow period and see the introduction of Ofwat's Business Customer and Retailer Measure of Experience (BR-MeX).

Teams across MOSL are working hard to ensure we can deliver the best outcomes for the market as new measures are implemented.

In January, we introduced a weekly 'huddle' in the office to bring different parts of the business together to better collaborate and understand the co-dependences across our programmes of work. This has worked well and will continue into the next financial year.

I also recognise the significant contribution of trading parties supporting different programmes through various industry groups and consultations.

On 7 March, we closed the fifth consultation on the Market Performance Framework programme. On behalf of the team, I would like to thank everyone who responded to help inform the next steps. As a reminder we will be publishing a detailed document outlining the consultation responses and holding a face-to-face feedback event on 24 April (see more on [page 11](#)).

Earlier this month we also had to announce a delay to the Bilateral Transactions Programme and the first tranche of the final release. This is not a decision we took lightly, but supported by the programme's Steering Group, felt it was the best decision to protect the quality of the release and the functionality of the hub. The programme has been hugely successful to date and it's important that we don't compromise at the final stage. See the full update on [page 12](#).

There is also significant change on the horizon with the Independent Commission for water sector reform launching its Call for Evidence. MOSL will be submitting a response as the market operator and encourage market participants to share their views too. Find out more on [page 7](#).

Of course, there is lots more in progress and we welcomed Mark Wilkinson, Northumbrian Water, as a new Wholesaler Director on our Board following changes to our Articles of Association ([page 6](#)). I hope you enjoy reading this edition and looking forward to working with you into the next financial year.

## Dates for your diary

**5 March:** [Strategic Panel 17a](#)

**11 March:** [Code Change Committee 37](#)

**17 March:** [Independent Water Commission Call for Evidence webinar](#)

**18 March:** [Metering Committee Meeting 48](#)

**19 March:** [Virtual User Forum](#)

**24 March:** [BR-MeX Webinar](#)

**26 March:** [Performance Assurance Committee 5](#)

**27 March:** [MPF Reform/Bilateral Hub Update](#)

**28 March:** [Code Advisory Group 107](#)

## Business Plan update

On 27 February, trading parties voted to approve our 2025–28 Business Plan and annual expenditure for 2025/26.

On 27 February, trading parties voted to approve our [2025–28 Business Plan](#) and annual expenditure for 2025/26.

In total, we received 47 votes out of a total of 63 members eligible to vote (74.6%), which is more than the required two-thirds for the General Meeting to be quorate. 46 members (97.9%) voted in favour of the resolution at our General Meeting, with one member voting against.

Our total spend budget for 2025/26 is £14,045k. £13,700k will be funded through MO charges with £345k funded from reserves – an overall increase of 1% from our 2024/25 charges.

MOSL CEO, Sarah McMath, said: “We are pleased that trading parties have actively engaged in the consultation and voting process. As always, it’s important that our programmes of work align to the priorities for the market.

This year’s plan demonstrates a mixture of ‘bedding in’ for a number of improvement programmes and a continued focus on addressing areas of friction, as identified in our three-year strategy.

I look forward to working with trading parties and key stakeholders in what will be another important year for the market and the sector as a whole.”

You can find out more about our plan and the voting process on [the news page of our website](#).



Sarah speaking at the WUN 2050 Net Zero networking event in Birmingham, February 2025

Upfront | **New and Notable** | Improvement Programmes | Industry Speaks | In Every Issue

## Trading Party Survey: You said, we did

In October 2024, MOSL issued its Annual Trading Party Survey.

As a result of previous trading party feedback, the survey now gives equal focus to MOSL's core services and the delivery of our improvement programmes. Overall, respondents gave MOSL's performance as a market operator an average score of 3.8 (on a 1-5 scale from 'poor' to 'excellent'). 84% of respondents this year rated MOSL's Overall Performance at four or above.

We continue to work on feedback received, which includes particular focus on the Retailer Measure of Experience (R-MeX) survey, the Market Improvement Fund (MIF), trading party audits, settlement, and the Market Performance Framework (MPF) Reform programme.

We've developed a detailed action plan to respond to trading parties' feedback and have already reached out to a number of parties to discuss their responses in more detail.

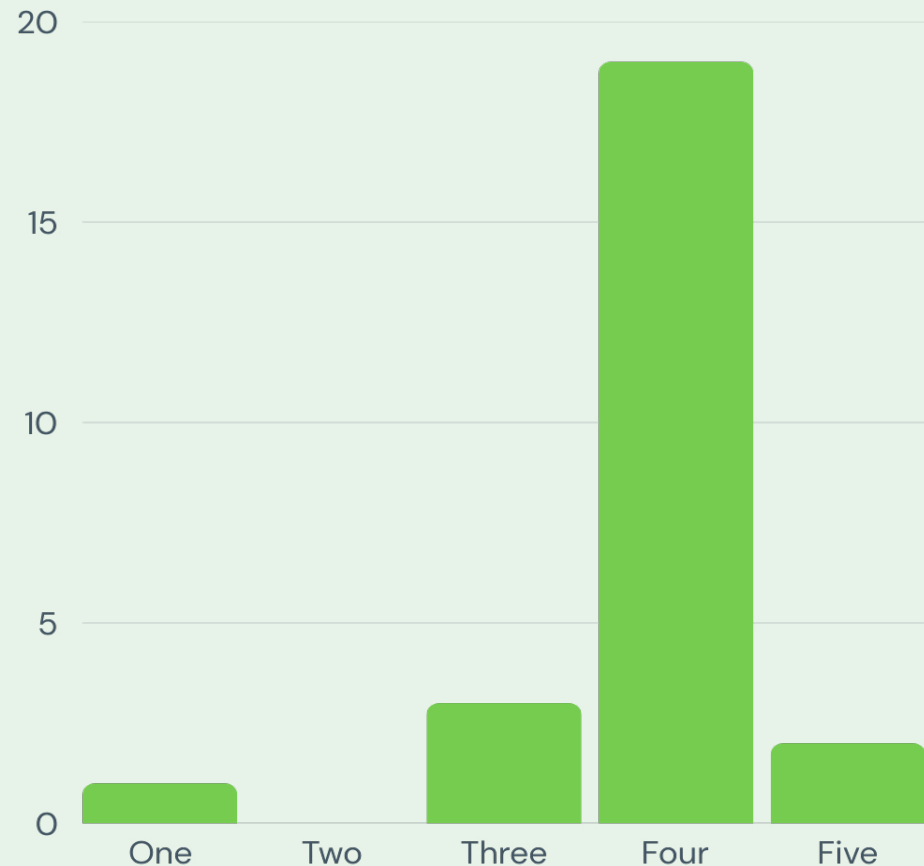
The anonymised responses are published on our website. For more information about the improvements we are making and changes we've made, please [visit the news page of our website](#).

As always, we value your feedback and would like to thank the trading parties who responded.

On 26 March, we will be issuing a 'Pulse' survey to Contract Managers, asking 'How would you rate MOSL's overall performance as market operator?' We look forward to receiving your responses.

If you have any questions on the survey or the response document, please do not hesitate to contact [comms@mosl.co.uk](mailto:comms@mosl.co.uk).

Overall performance: Member votes



## **New Wholesaler Director appointed to the MOSL Board**

We are pleased to announce the recent appointment of Mark Wilkinson, Head of Income and Wholesale at Northumbrian Water, to the MOSL Board.

Following a member vote in July 2024 and the subsequent implementation of [Code Change 'MAC and MOSL Articles Duplication' \(CPM059\)](#) on 6 December, MOSL's Board composition has changed from two Retailer Directors (previously unassociated and associated) and one Wholesaler Director, to two directors from each industry category. Following the code change implementation, recruitment started for an additional Wholesaler Director.

We received a number of strong applications who went through the new Board selection process (also part of the code change to move from an election to a selection process).

Mark has over 30 years industry experience, from an agency employee with Essex and Suffolk Water in 1995 to Head of Income and Wholesale at Northumbrian Water. He qualified with the CIMA in 2006 and is also a Pension Scheme Trustee and School Governor.

He said, "I am really pleased to be joining MOSL's Board, it's an exciting time for the non-household market with lots going on around smart metering and new water efficiency targets."

Mark was appointed to the MOSL Board with effect from 27 February 2025 for a three-year term.

If you have any questions about this appointment, please email [company.secretary@mosl.co.uk](mailto:company.secretary@mosl.co.uk).



## Independent Commission Call for Evidence

On 27 February, the Independent Commission, established by Government in October 2024 to look into reform in the water sector, launched its Call for Evidence (CfE).

Lyv Nabarro, Head of Market Engagement and Communications at MOSL, attended the launch event along with Independent Member of the Strategic Panel, Rick Hill.

The almost 300-page CfE sets out the history of the water industry since privatisation and how changes to regulation and policy have led to a complex and “fragmented” system. It also sets out examples of where the regulatory framework may not be working well and invites views on areas of reform across 73 questions.

MOSL will be responding to the CfE as market operator of the business water market. MOSL CEO, Sarah McMath, has been engaged with the Commission and had a meeting with Sir Jon Cunliffe, Independent Chair of the Commission, early on in the engagement process.

Reflecting on this meeting in the CfE document, the Commission stated:

“In initial engagement, Market Operator Services Limited (MOSL) was positive about the future of the Business Retail Market (BRM). However, the Commission has heard how the retail market in England struggles to engage smaller non-household customers with switching between water retailers, suggesting they do not see value in doing so.”

This suggests that the Commission has heard a range of views since MOSL’s meeting in December that have changed its perception of the competitive market and the benefits to smaller customers.

MOSL will not be seeking to consult with trading parties in developing its submission but supported the Strategic Panel in hosting a webinar seeking market views (find out more on [page 15](#)).

We will be using the online form to submit our response and will continue to engage with the Commission where appropriate. For those interested in submitting their own responses, the deadline is midnight on 23 April.

If you have any questions, please email [comms@mosl.co.uk](mailto:comms@mosl.co.uk).



Upfront | **New and Notable** | Improvement Programmes | Industry Speaks | In Every Issue

## New Trading Party entrants: FCC Environment and InterGen

We recently welcomed two new retailers to the market: FCC Environment (UK) Ltd and InterGen.



FCC Environment operates a range of recycling, treatment and disposal facilities across the UK. Its approach is to minimise the amount of waste that ends up in landfill by transforming it into resources wherever possible. FCC Environment accepts and treats 885,000 tonnes of wastewater every year before returning it to the water company sewers at strengths and volumes that are acceptable to their treatment works. FCC Environment (UK) Ltd intends to supply circa 153 sites across England with a focus on trade effluent.

Founded in 1995, InterGen is one of the longest operating independent generators in the UK. As developers, owners, and operators of electrical power generation facilities, InterGen (UK) Ltd owns three efficient, combined-cycle power stations across England which they intend to retail.

Both trading parties have entered the market as self-supply retailers managed by Waterscan.

You can view all of our members on [our members page](#).

## Applications fly in for Market Improvement Fund Round 4

We are pleased to announce that we received 13 applications for the latest round of the Market Improvement Fund (MIF).

The application window closed on 28 February, with the applicants requesting over £1.8m in total.

The projects have since undergone an eligibility review by MOSL and will shortly be presented to the Selection Committee, made up of a sub-set of the Strategic Panel. The Selection Committee will then invite a shortlist to present their projects to the committee.

We look forward to bringing you more updates as the round progresses.

Upfront | **New and Notable** | Improvement Programmes | Industry Speaks | In Every Issue

## Record number of retailers participating in latest R-MeX

We are delighted to share that 18 retailers responded to the latest Retailer Measure of Experience (R-MeX) survey – the highest number of respondents since the survey began.

The survey, which was open throughout February, gives retailers a bi-annual opportunity to review the core services provided by their wholesaler(s). Following its inclusion in the upcoming Business Retailer and Customer Measure of Experience (BR-MeX) from 1 April, the scoring will be shared with Ofwat and could be used in the BR-MeX shadow scoring for this year.

Wholesalers have been provided with a copy of their individual R-MeX responses. The league table and commentary will be published and the R-MeX dashboard will be updated shortly.

If you have any questions, please raise them to Performance via My MOSL.

## CCW and Ofwat Forward Work Programme Responses

Last month, MOSL published its response to CCW's draft Strategy / Forward Work Programme 2025/26.

In our response, we set out our views on the commitments CCW has made that directly or indirectly impact the market and business customers.

We welcome a 2-years-on progress report of CCW's Five Year Review of the market and highlight the importance of reassessing recommendations in light of developments in the market and wider water industry.

You can [read the full response here](#).

We also responded to Ofwat's Forward Programme for 2025/26 calling out our support for the areas that will drive improvements to market conditions. We also comment specifically on the quarter milestones, such as the commitment to define the regulatory approach to Open Data and

a review of the Retail Exit Codes (REC) price protections.

You can [read the full response here](#).

The Panel has also submitted responses to both forward programmes. Find out more in the Panel updates section on [page 15](#).



## Data Assurance Service: this month's progress

At the beginning of February, we announced the move to IDenteq as the new service provider for the business-as-usual (BAU) data assurance process.

This move came at a natural point in the programme as we explored what the enduring service would look like and who was best placed to support us.

Since then, we have run two fortnightly Data Quality Audits (DQAs) to support parties in gearing up to April and the launch of the Business Customer and Retailer Measure of Experience (BR-MeX) metric on address and premises data quality.

These audits have been well received and complemented by a series of technical drop-in sessions with trading parties, MOSL and IDenteq colleagues.

We have also published a series of documents outlining the changes to the DQA following the move to IDenteq. The purpose of these documents is to provide clarity on why assurance volumes may have changed and how the matching service now verifies supply points as 'assured' or 'of concern'.

The summary of changes document, along with IDenteq's guidance and an updated version of the Premises and Address guidance, can be found under 'Key documents' on the [Data Assurance webpage](#).

The next working group meeting will be held on 25 March where we will seek members' feedback as we head towards 1 April.

The next technical drop-in sessions are:

- **Monday 24 March**, 10am – 12pm and 1pm – 4pm
- **Friday 3 April**, 1pm – 4pm
- **Monday 7 April**, 10am – 12pm
- **Tuesday 8 April**, 10am – 12pm
- **Friday 18 April**, 10am – 12pm and 1pm – 4pm

Further dates will be communicated by email, so please ensure you are signed up to receive updates from the programme by selecting 'Data Insight and Analytics (inc Data Assurance Service)' on the subscribe page of our website.

If you would like to book a slot, please email [comms@mosl.co.uk](mailto:comms@mosl.co.uk) with your preferred date and time (slots are booked for 45 minutes).

### MOSL mailing lists

Receive the updates you're interested in by keeping your email preferences up to date.

[Subscribe to receive emails here](#), and update your preferences at any time by selecting 'update subscription preferences' at the bottom of any email you receive from us.



Upfront | New and Notable | **Improvement Programmes** | Industry Speaks | In Every Issue

## Market Performance Framework Consultation 5: Next steps

Thank you to everyone that took part in the latest Market Performance Framework (MPF) consultation, which closed on Friday 7 March.



Consultation 5 invited feedback on proposals for the level of performance standards and charges for six of the priority meter reading key performance indicators (KPIs). The consultation also sought feedback on proposals for the level at which the performance charge 'cap' should be set, and the ability for the Performance Assurance Committee to adjust a KPI's performance standard up or down by a given percentage (i.e. 5%) each year.

21 companies responded to the consultation, including 12 wholesalers, eight retailers, and CCW. The quantitative results were shared on Friday 14 March and we are currently reviewing the qualitative responses in detail.

On Thursday 17 April, MOSL will publish the verbatim submissions, detailed responses with comments, and an indication of some of the key themes coming out of the consultation. As per Consultation 4, MOSL will be hosting a face-to-face event in London on Thursday 24 April to present and discuss the key themes and MOSL's proposed handling of each. Further details of the event will be issued via email.

Trading parties will be asked to confirm that they wish to attend, with up to two delegates per company.

Three new metrics that MOSL will be monitoring for inclusion in Ofwat's Business Customer and Retailer Measure of Performance (BR-MeX) are due to go live in April. These cover the accuracy of premises data held in CMOS and trading parties' performances completing bilateral transaction requests. We will be holding a [BR-MeX webinar on 24 March](#) to introduce the appointed BR-MeX survey provider and talk through the process from April. Details are available on the Calendar page of our website.

If you have any questions on the MPF in the meantime, please raise a query via My MOSL.

Upfront | New and Notable | **Improvement Programmes** | Industry Speaks | In Every Issue

## **Bilateral Transactions Programme: Phase 15 rollout delay**

On 4 March, we informed Contract Managers that we have delayed the rollout of Phase 15 of the Bilateral Transactions Programme.

The first tranche of the programme's final phase was scheduled to be delivered on 26 March. However, potential issues were identified in MOSL's pre-release review and testing. Given the limited time to address the issues before the scheduled go-live date, the Steering Group agreed with MOSL's recommendation to delay the release rather than risk compromising its quality or Hub functionality.

We are currently replanning the phase roll-out and will arrange a Contract Manager's update meeting with trading parties as soon as possible.

Phase 15 is the final part of CPW139 to deliver 49 additional, lower-priority and lower volume enhancements to the Hub. These additional enhancements will remove the need for legacy forms and emails and improve efficiency.

If you have any questions or concerns, please raise a query via My MOSL.

## **Modernisation of Market Systems: Single Sign-On**

In February, we successfully implemented the Single Sign-On (SSO) in the CMOS MPS2 test environment.

This allows trading parties to authenticate using their own company credentials rather than the current CMOS usernames and passwords. This will improve the user experience and system security.

We are due to implement SSO in the CMOS Production environment on 7 March, followed by the MPS test environment on 11 March. For reference, the [SSO login guide is available on our website](#).

Further work being undertaken as part of the Modernisation of Systems programme is supporting the design and delivery of the Market Performance Framework (MPF) Reform programme, the Bilateral Transactions programme and work to define the business case for a data sharing hub.



## Strategic Metering Review: Have your say on proposals for meter data sharing mechanism

Stakeholders have until the end of March to have their say on proposals for a mechanism to enable wholesalers and retailers to share smart meter data easily and efficiently.

Wholesalers are due to provide smart metering to more than 10 million customers over the next five years, including nearly 800,000 business customers. Unlike traditional meters, which are read either monthly or bi-annually, smart meters can take hourly reads, transforming trading parties' understanding of how and when customers use water.

The granular data from smart metering provides numerous benefits; from ensuring customers' bills are timely and accurate to helping companies meet the growing demand for water by reducing leakage and waste. For these benefits to be realised, wholesalers – who own the meter – need to share the data from smart meters with retailers. Currently, there is no standard, agreed method for doing so.

The [Strategic Panel's National Metering Strategy for the non-household market](#) recognised the importance of a data sharing mechanism. The Panel asked MOSL to work with the Metering Committee and other trading parties to recommend a preferred way forward. MOSL has adopted a best practice approach to developing the business case in three stages: the Strategic Case, Outline Business Case, and Full Business Case. The Panel approved the Strategic Case in November 2024 and Outline Business Case (OBC) in March. MOSL is now seeking stakeholders' feedback on the OBC before moving the Full Business Case.

Programme Manager, Chris Dawson explains: "With wholesalers already rolling out smart metering, trading parties have told us there is an urgent need for a standard approach to sharing data to maximise the benefits of smart metering data. We have explored three options: allowing wholesalers and retailers to develop their own systems and processes, using a peer-to-peer 'trust framework' similar to the energy and banking sectors, or developing a central data sharing 'hub'.

The OBC considers the options in more detail and presents the key objectives for the preferred route – a data sharing 'hub' – which the Panel believes has a strong case.

Before moving forward, the Panel is keen to hear stakeholders' views on the proposals, including the objectives of the solution in terms of what it 'must', 'should' or 'could' deliver, whether the requirements meet their needs and views on the proposed solution.

Depending on the results of the consultation and subsequent discussions with the Panel, we hope to be able to begin work on the Full Business Case and carry out a request for proposals (RFP) with prospective suppliers/delivery partners. The Full Business Case will be presented to the Panel in June for a final decision."

All documentation, including the slides and a recording of the webinar we hosted to explain more about the consultation, is [available on the MOSL website](#).

Upfront | New and Notable | Improvement Programmes | **Industry Speaks** | In Every Issue

## RWG Corner

Hear the latest updates from the Retailer Wholesaler Group (RWG) Co-Chairs, Fallon Wilkinson and Gerard Lyden.

### Potential for a new sub-group

The RWG Steering Group is gauging interest from members in setting up a sub-group to investigate meter reading skips. This follows a discussion at the RWG face to face meeting in December.

Whilst the RWG has a [Standard Skip Codes and Processes guidance document](#) which outlines recommended skip codes, without further transparency on why meters cannot be read and are 'skipped', remedial work at meters may not

be effectively undertaken and customers will remain negatively impacted.

MOSL is currently working on improving the transparency and consistency of the application of skip code data in the market and is considering options, including a centralised approach through CMOS. The collation and reporting of data in this way will support a greater understanding of meter reading issues, but work is also needed on the steps to resolution for each issue.

The purpose of the group is to work through the various categories and cases of meter read skips and identify and agree on appropriate resolutions, such as good practice, changes to the market codes, etc.

If you would be interested in this area of work, please email [rwg@mosl.co.uk](mailto:rwg@mosl.co.uk) by 28 March.

### RWG Summer in-person Meeting

The next [RWG in-person meeting](#) will take place on Tuesday 24 June 2025 at the Park Plaza in Leeds. Booking details will follow but, for now, please save the date.

If you would like to submit an agenda item for consideration by the RWG Steering Group, please send this to [rwg@mosl.co.uk](mailto:rwg@mosl.co.uk) by 30 April.

### Vice Chair roles

The RWG is currently seeking retailer and wholesaler Vice-Chairs to work alongside Fallon and Gerard. If you are interested in supporting the RWG to shape its future direction, please contact [rwg@mosl.co.uk](mailto:rwg@mosl.co.uk) for more details.

### Find out more

If you would like to hear more about RWG activities, you can [register for updates here](#).

### Upcoming RWG meetings

- **20 March:** Water Efficiency Sub-group
- **27 March:** Wholesale Tariff Simplification Sub-group
- **31 March:** Steering Group
- **17 April:** Water Efficiency Sub-group
- **17 April:** Wholesale Tariff Simplification Sub-group
- **17 April:** Smart Meter Rollout Sub-group

## Strategic Panel update

Strategic Panel Chair, Trisha McAuley, provides an update on the Strategic Panel.



On 27 February, independent panel member Rick Hill attended the launch of the Independent Commission's water sector review call for evidence in Manchester. Rick fed back at our ad-hoc meeting on 5 March to help the Panel start to formulate its response.

While the scope is extremely wide ranging, I encourage all market participants to respond, with evidence, to the questions around 1) whether the business retail market should continue to apply to smaller users (who may be less engaged) and 2) options to support greater water efficiency through the market. On this, the commission has heard current tariffs and incentives may be unhelpful in relation to water usage.

On 17 March, we held an industry workshop to hear views from across the market. While the Panel will work to develop its own independent position, we really appreciate the level of engagement from the market and the very constructive range of views shared to help identify areas of common thinking. We plan to engage further with stakeholders as our response develops ahead of the 23 April deadline.

At our last meeting we also approved the Outline Business Case for a central hub to share meter read data in the market. This followed the Panel's approval of the Strategic Case in November 2024 (see more on [page 13](#)). The Panel gave its approval for MOSL to proceed with the Full Business Case given the positive economic and commercial case evidenced. I encourage trading parties to input via the consultation due out this month. [The Panel also fed back on Ofwat's forward programme for 2025-26](#), highlighting the actions for Ofwat in our Roadmap to a Flourishing Market outlined for delivery during the next financial year.

Finally, we kicked off recruitment for 13 vacancies across the Panel and its committees. These include a vacancy for a wholesaler member of the Strategic Panel. I encourage senior executives with experience of strategic decision-making to apply. The window to submit nominations will close at 9am on 2 April. Further information on the other vacancies can be found on [the MOSL website](#).

As ever, if you have any questions or feedback for the Panel, please email [panel.secretariat@mosl.co.uk](mailto:panel.secretariat@mosl.co.uk).

Upfront | New and Notable | Improvement Programmes | Industry Speaks | In Every Issue

## Making changes: Your change proposal update

### New change proposals

- [Wholesaler MPS Charge Discontinuation \(PIP236\)](#) was assessed by the Code Change Committee against the Acceptance and Prioritisation Criteria (A&PC) where it was determined that it failed the criteria, and would, therefore, be submitted to Ofwat for early rejection. Ofwat will now consider whether the change should be rejected or returned for further assessment. The Market Performance Framework Reform programme has proposed certain wholesaler performance charges be discontinued, which this change would have brought forward.
- [CMOS Data Retention Beyond Seven Years \(CPW157\)](#) seeks to change how long the market operator should retain data in CMOS. The Code Change Committee accepted it into the change process in December

2024 but put it on hold pending availability of resource. The committee re-prioritised this change and now expects to make its recommendation to Ofwat in November 2025.

### Recommendations

No changes were recommended at the 11 March Code Change Committee meeting.

[Data Quality Assurance Flags \(CPW155\)](#) was due to be recommended but the proposer (MOSL) asked for more time to confirm the business case and ensure the solution satisfies emerging BR-MeX and MPF requirements. The committee agreed to extend the deadline for recommendation to July 2025. This will delay CMOS implementation, if approved by Ofwat, from December 2025 to May 2026.

[Interim Supply: Cost Recovery Mechanism \(CPW153\)](#) and [Interim Supply: Initial Cost Support \(CPW154\)](#) were also due to be recommended but Ofwat has extended the timetable for these changes to May 2025. This will allow further analysis of the solution before they are recommended by the committee.

### Consultations

A consultation for [Customer and Third-party Access to Consumption Data \(CPM060 & CPW156\)](#) is expected next month. This change seeks to allow access by approved third parties and representatives of customers to their consumption data. The proposer hopes this change will facilitate environmental reporting obligations in the commercial real estate sector, but it could also support other stakeholders interested in water efficiency.

### Post Implementation Review

[Interim Supply Customer Data Provisions \(CPW137\)](#) was implemented in October 2023 and established a process for providing customer billing data to interim suppliers in the event of a retailer exiting the market unexpectedly. The committee heard about the effectiveness of the ongoing monthly data collection from retailers and decided an enduring system solution was not merited.





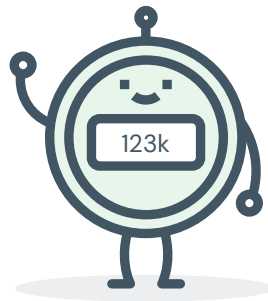
## Monthly Market Stat

### The numbers game

“Out of a total of 1.27m water meters in the NHH market, 123k are categorised as “NoFloW” meters. NoFloW meters are meters at occupied premises that have had the same read three or more times. This could mean that water companies are losing revenue at those sites.”

For this month’s Market Stat, we wanted to highlight the importance of meter reads and show just how many meters in the market aren’t recording usage accurately. When a meter at an occupied premises is not recording a change in usage, it could indicate either a meter asset or data quality issue. Reviewing meter read history and categorising meters accordingly helps us to understand potential issues and areas for prioritisation. If water companies don’t know how much water is being consumed at a premises, leaks could go unnoticed, customers could be issued inaccurate bills, and trading parties could lose money.

NoFloW meter reports were developed as part of the Strategic Metering



Programme’s Quick Start Project 25, which looked at the recommendations from the [Market Improvement funded project of the same name](#). From March, monthly NoFloW reports, showing the NoFloW meters each wholesaler and retailer is responsible for, will be shared with trading parties. These reports will be provided to support with the identification and prioritisation of meters for further investigation by both retailers and wholesalers.

Source: MOSL analysis on CMOS data, Feb 2025

## CMOS stats Feb 2025

Number of High Volume Interface (HVI) transactions submitted	585,226
Number of Medium Volume Interface (MVI) transactions submitted	227,585
Number of Low Volume Interface (LVI) transactions submitted	41,125
Total transactions submitted	853,936 – 5% increase from Jan
CMOS Notifications sent	1,689,722
Number of active users in CMOS (GUI)	5,049
Maximum number of concurrent users	575
Unplanned outages	0
Number of Unplanned Settlement Runs (USRs)	64
Number of Market Dataset (MDS) reports generated	15,435



## Behind the mailbox: Annie Boskova

This month, we're speaking to Annie Boskova, Market Operations Analyst:



"Hi, I'm Annie.

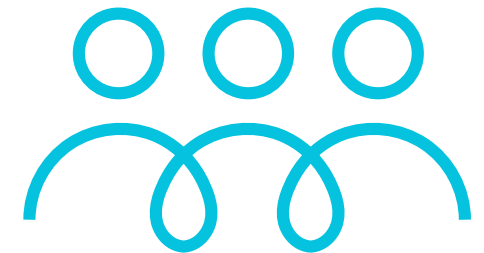
I come from an academic background in Psychology and originally wanted to become an Educational Psychologist, but along the way, I realised that I was actually more interested in numbers and data than people.

Before MOSL, I worked for Hampshire's Children's Services, supporting Social Workers within the fostering, adoption, and children in care teams. While I gained valuable experience, I realised it didn't provide the challenge I was seeking.

Fast forward several data courses (including Python, MySQL, and a little Tableau) and a career change later, and somehow, I've ended up in the water industry! I'm still not entirely sure how that happened. Thanks to my amazing team and fellow MOSLers, I'm slowly getting my head around what the water industry is and does, but I still have lots to learn (which is kind of exciting!)

As a Market Operations Analyst, I am involved in Settlement analysis (yay data!), business as usual tasks such as Unplanned Settlement Runs (USRs) and Self-Supply Sold Sites, as well as Market Entry Assurance (MEA) and Market Re-Assurance (MRA) – to date I have successfully managed to navigate a retailer through MEA and am working on a couple of MRAs.

Outside of work I've usually got my head stuck in a book – ideally one with dragons, but I'll settle for a good epic. If not, I'm likely exploring a castle or ruin."



Upfront | New and Notable | Improvement Programmes | Industry Speaks | **In Every Issue**

## MOSL on the Move

From industry events to trading party visits, here's where we've been this month and where you can find MOSL coming up.

### International Women's Day: Water's Women's Network Event

On Thursday 6 March, the Institute of Water's Women's Network held an online event in celebration of International Women's Day. Attendees heard influential voices, including keynote speaker, Sarah McMath, discuss how we can support inclusion and accelerate action in the water sector aligned to this year's theme. You can [view the slide deck here](#), or [watch the recording here](#).

### Waterwise Annual Conference

Several MOSL colleagues attended sessions from the online Waterwise Conference, which took place from 10 – 13 March. Topics ranged from sector ambition and innovation to fostering a water-saving culture and sustainable water use. [Find out more on the new Waterwise website](#).

### Cambridge Water Scarcity and Economic Growth Roundtable

On 13 March, MOSL CEO, Sarah McMath was invited to attend and present at a roundtable hosted by Secretary of State, Steve Reed. The roundtable focused on addressing the water scarcity challenges in the region to support the Government's plans for economic growth, particularly in the 'OxCamb arc'. Sarah led a short presentation on the role of the business water market and how centralised consumption data and sector benchmarking can support in providing a greater understanding of how different sectors and customers are using water to look at alternative water saving solutions.

### FinTech West's Sustainable Finance Water Scarcity Roundtable

On 2 April, MOSL is leading a roundtable on business-led water conservation alongside Waterwise and researchers from the Sustainable Economies Research Group at Bristol Digital Futures Institute. The roundtable will explore how we can drive business-led

solutions through smarter incentives, regulatory frameworks, and technological innovation. [Find out more and secure your spot here](#).

### Smart Water Systems Conference

On 15–16 April, MOSL's Finance Director, Steve Formoy, will be presenting at the Smart Water Systems Conference in London. Steve will be speaking about developing the business case for a data sharing mechanism that will support the business water market to better manage and make available the increased volume of smart meter data from water companies. [You can book your place here](#).

### Join the conversation!

Follow us on social media

 Market Operator Services Limited (MOSL)

 mosl.water

 @MOSL\_

