Code Change Committee Update

CPW157: Data Retention Beyond Seven Years

Summary of the change

CPW157 seeks to amend the existing CMOS data retention policy from seven years to mitigate any potential impacts on settlement.

Proposer

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Any Questions?

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Purpose	**The Code Change Committee is invited to:** • **NOTE** the contents of this paper
Impacts	Impacts on: • Customers • Wholesalers • Retailers • WRC

Contents

This paper provides an update to the Code Change Committee (CCC) on the solution(s) and timelines currently under consideration for CPW157, along with a summary of progress made in advancing the change.

The finalised timeline will be submitted to the CCC post-consultation as part of a replan paper.

The Code Change Committee will consider this change at its meeting on 10 February 2026.

For further information, please see the Change Proposal Log on the MOSL website or contact the Code Change Secretariat at: codechange@mosl.co.uk

1 Executive Summary

The estimated reading time for this paper is around [5] minutes.

1.1 Ask of the CCC

The Code Change Committee (CCC) is invited to note the status of CPW157.

1.2 Recent Developments

MOSL informed the Code Change Committee that further work was needed to evaluate data-retention options and convened a Working Group to support this assessment. After completing two Working Group sessions, MOSL held one-to-one discussions with each member to gather detailed views, concerns, and operational needs.

During this period, MOSL analysed the feedback from trading parties and, in addition to the existing options, developed a new solution that addressed the gaps and priorities identified. All options, including the newly developed one, were then considered for selection at the third Working Group meeting on 28 January 2026.

The options for consideration were:

1. Retain all settlements impacting data in perpetuity and delete data that does not impact settlement after seven years.
2. Seven years plus one read, i.e., delete all data at seven years, and retain one extra read beyond to anchor the settlement profiles.
3. Permanent retention of all data
4. Archival of all data beyond 7 years

2 Findings from Working Group Sessions and One-to-One Engagement

The CPW157 Working Group met between September 2025 and October 2025 to explore the implications of MOSL's seven-year data deletion policy and its impact on settlement accuracy and customer outcomes. Members reviewed a wide range of scenarios where deleting meter reads older than seven years could distort settlement calculations. They particularly discussed scenarios

where there may be gaps in meter reading history, vacancies, temporary disconnections or meter rollovers.

Trading parties emphasised that most impacts occur post-RF, where reconciliation relies heavily on historic data. Members raised concerns around volumetric adjustments, trade effluent meter alignment, and the need to understand how CMOS handles transactions that straddle the seven-year boundary.

The group agreed on emerging critical success factors, including:

1. Preserving the integrity of the settlement profile within the 44-month window.
2. Supporting trading parties' ability to process refunds and resolve disputes (potentially up to six years).
3. Balancing necessary data retention with GDPR data minimisation requirements.

After the second working group, MOSL organised a series of one-to-one meetings with members, held between 6 and 13 November 2025. This was to ensure that members could clearly outline the issues they encounter when working with historic settlement data and post-RF activities.

This feedback highlighted the need for a solution that protects settlement accuracy while remaining simple, affordable, and GDPR-compliant. Using these insights, MOSL developed a new solution that retains all settlement-impacting data but deletes non-settlement data after seven years. It was then compared against the previously discussed options such as seven-years-plus-one-read, permanent retention, and archival to help the group choose a preferred approach.

3 Review of Data-Retention Solutions and Working Group Opinions

At the third working group, members discussed the solution options, with the intention of selecting one to take forward for development.

After weighing the benefits and drawbacks of each option, the members concluded that the new solution option (to retain settlement data in perpetuity

and delete non-settlement data at 7 years) was the most reliable, proportionate and operationally practical. It addressed their concerns about settlement distortion, aligned with GDPR requirements and avoided expensive financial implications. This solution was therefore selected for further development and will be shared with the market through consultation.

4 Timeline

The table below details the provisional timeline for the assessment of this change, which will be presented to the CCC after **consultation** for a replan decision:

Milestones	Date
Working Group 3 to agree solution	28 January 2026
Working Group 4 to agree consultation note	24 February 2026
Consultation	11 March 2026 to 3 April 2026
Working Group 5 to discuss consultation responses	21 April 2026
Working Group 6 for DRR sign off	26 May 2026(working group 6)
CCC Recommendation	11 August 2026
Ofwat Decision Date	November 2026
Implementation	December 2026

5 Next Steps

The finalised timeline will be presented to the CCC after the **consultation**, as part of a replan paper.

The working group has reviewed solution options presented in the above sections and selected an option on 28 January 2026. This solution will go to the market for consultation in March.