

## Public Minutes of the Performance Assurance Committee Meeting 14

17 December 2025 | 09:30 – 14:45

Via MS Teams

Status of the Minutes: FINAL

### MEMBERS PRESENT

Claire Whyley	CW	Independent Chair	Jesse Wright	JW	Wholesaler Representative
Lindsey Fussell	LF	Independent Member	Andrew Smith	AS	Retailer Representative
Keith Richards	KR	Independent Member	John Spreadbury	JS	Retailer Representative
Adam Boyns	AB	Customer Representative	Robert Hetherington*	RH	Ofwat Representative
Sam Dawson	SD	Wholesaler Representative	Sarah McMath*	SM	MOSL CEO
Tanya Sephton	TS	Wholesaler Representative			

*\*Non-Voting Members of the Committee*

### OTHER ATTENDEES

Adam Richardson	AR	Panel Secretary	Janet Judge	JJ	MOSL Presenter
Sam Webb	SW	MOSL Presenter	Nichola Sampford	NS	MOSL Secretariat
Axelle Saada	ASa	MOSL Presenter	Evan Joannette	EJ	MOSL Presenter
Oli Robins	OR	MOSL Presenter	Peter Strain	PS	Castle Water Observer

APOLOGIES

Ben Kershaw	BK	Retailer Representative			
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OPEN SESSION

1. Welcome and Introductions

- 1.1. The Chair welcomed everyone to the Performance Assurance Committee (“Committee”) meeting and noted apologies had been received from BK.
- 1.2. The Chair reminded Committee members of the requirement to act impartially and not in the interest or as a representative of any organisation or individual. If Committee members believed they had an actual or perceived conflict they should declare this at the start of the meeting or before an agenda item.
- 1.3. It was confirmed that the meeting was quorate.

2. MPF Reform Programme Update

- 2.1. The Committee received headlines from the Programme including information about implementation timeline and additional metric updates.
- 2.2. The Committee noted that the KPI metrics went live on 1 December and the first set of performance reports will be published on 23 January 2026. Charging reports for October have been shared with trading parties and this work will be replicated in November to give an idea of charging levels ahead of the first invoices.
- 2.3. The Committee will continue to be provided with information about the MPF Reform Programme around the Core Service Model and updates on additional metrics and market indicators as these go live. The Programme hopes to have the first version of the Market Performance Data Pack to circulate to the Committee in May 2026.
- 2.4. The Committee received an overview of the metrics discussed in previous meetings. At PAC13 in November 2025, the Additional Metrics were presented to the Committee, grouped in themes. These were covered again with the suggestions from the Committee to keep to the “higher is better” model, meaning that the reporting for some metrics would be flipped. The

following metrics were presented to the Committee for formal endorsement as Additional Metrics that the Committee will use as part of its escalation decisions and for context in judging performance:

- M14 (Wholesaler Metric) – Proportion of meters with credible GIS coordinates
- M10 (Wholesaler Metric) – Long Unread Meters with outstanding B5/C1/C5 bilateral requests)<sup>1</sup>
- M22 (Retailer Metric) – Proportion of Long Unread Meters (LUMs)
- M38 (Wholesaler Metric) – Proportion of Legacy Long Unread Meters (LLUMs)

2.5. Following the discussion, the Committee:

- **AGREED** (Unanimous) to these Metrics being developed as Additional Metrics

2.6. The chair thanked OR for the update.

### 3. Additional Metrics Review

3.1. The Committee looked at the MPF Metric M13 in detail (Long term vacant assurance). The Committee noted that a related metric had originally been setup as part of the work done to update Holistic Reporting in 2021 with the intention to encourage Wholesalers to review premises data. It had been discussed as a possible KPI, but M12 (Proportion of premises with verified supply address and premises data) was adopted by Ofwat as part of the BR-MeX related KPIs in April 2025.

3.2. The Committee noted that the Market Codes (CSD0104) require Retailers to maintain the Occupancy Status of eligible premises.

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<sup>1</sup> Bilateral request codes: C1 – Meter Verification; B5 – Repair or replacement of a faulty meter performed by the Wholesaler; C5 - Deregistration of a Supply Point (including as a result of incorrect or erroneous registration or a change of circumstance) or removal of Service Components at the request of the Wholesaler

- 3.3. To satisfy the Committee's request to ensure that all metric reporting reflects a principle of "higher is better", the metric name has been changed to "Proportion of **verified** vacants" (as originally the metric was proposed to report on the proportion of unassured vacants).
- 3.4. The Committee noted that the frequency of this metric was proposed to be quarterly to align with Ofwat's indicative BR-MeX calculations as well as to give retailers time to fix data. It was proposed that the work will be underpinned by a Vacancy Assurance Service.
- 3.5. The vacancy assurance assessment will assess SPIDs with verified premises and address data only, i.e. those SPIDs that have passed the M12 Metric (Proportion of premises with verified supply address and premises data) and premises "of concern" under that metric would not be assessed. It was proposed that SPIDs undergoing Eligibility Assurance and SPIDs that were less than 6 months old (new connections) or those made vacant in the previous 6 months would be excluded.
- 3.6. The Committee noted the definitions for verified vacant SPIDs, namely a SPID with a meter read but nil consumption, a SPID with fewer than 4 external database footprints (i.e. the Vacancy Assurance Service provider has few sources confirming occupancy) and a SPID assured by a trading party as vacant. SPIDs identified as "of concern" would be a SPID with 4 or more external database footprints. The Committee noted the findings of the pilot for the metric, that was carried out in the summer of 2025, indicated that overall market performance is good with around 96% of Vacant sites counting as verified. The slicers for the dashboards that were recommended were to show unmetered/metered vacancy as unmetered vacancy is disproportionately high and a greater proportion of these SPIDs were older than 3 years. The other slicer suggested was to show time bands as virtually all work to make properties occupied is on vacants that are less than 3 years old. Committee members were interested in dashboard features that would allow data to be sliced by age, metering status and potentially by service type, as well as whether it would be feasible to provide a split between wastewater and surface water. EJ agreed to explore additional breakdowns of data.
- 3.7. It was agreed the Committee would receive some worked examples for the M13 metric to present how SPIDs were classified as vacant or not vacant using the data assurance process, possibly by sharing insights from the pilot carried out by the Data Assurance Service Working Group. The Committee was also interested in receiving clarity on unpaired SPIDs are handled.

- 3.8. The PAC concluded that M13 should be taken forward as an additional metric as it compliments M12. It was suggested that it highlights the problematic areas (unmetered vacants over 3 years old) and allows trading parties to have sight of these in order to prioritise them.
- 3.9. Committee members were interested in the verification process, particularly with regard to the use of external databases and the transparency of the process. It was noted that the verification process used was the same one used for the M12 metric. It was noted that the Committee would like some insight into the data sets used by the Vacancy Assurance Service. MOSL will request this information from the Vacancy Assurance Service<sup>2</sup>.

***ACTION: A14\_01***

3.10. Following the discussion, the Committee:

- **AGREED** (unanimous) to endorse M13 as an Additional Metric, but would like further information on the Verification Assurance Service's data set hierarchy

3.11. The Chair thanked JJ for her presentation.

## 4. Core Service Model Delivery

- 4.1. The Committee heard a playback of key themes discussed at PAC13 and were given early sight of the way forward. The concept of the Market Performance Data Pack was supported and the cadence for meetings had been agreed. It was noted that an outline for the design of the data pack (not using live data) will be shared ahead of the PAC15 in January 2026, before Paper Day, in order to allow the Committee the opportunity to participate in a workshop session at that meeting.

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<sup>2</sup> Following the meeting, the Vacancy Assurance Service was approached by MOSL and confirmed that it does not use any weighting of data sets, but that machine learning will look for similarity between all the names to create the best math across all of the data sources

- 4.2. The Committee noted that the Market Performance Data Pack will include data trends and provide context for discussions about trading parties as well as wider market information. It was anticipated that the Committee will use this information in escalation decisions.
- 4.3. The Committee's request for consistency will be incorporated into the pack; higher numbers and percentages will represent better performance across all metrics. The pack will be iterative, with the opportunity to add more interactive features over time where possible. The Committee expressed an interest in building in the ability to access direct data and this would be considered either at the outset or as a build on the initial pack later.
- 4.4. The Chair thanked OR for his update.

## 5. Routes to Resolution

- 5.1. The Committee received an update on the possible routes to resolution for risks and issues logged in the Risk & Issues tracker. The Chair reminded the Committee that the owner of the Risks & Issues Tracker was the MOSL Board and that not all issues or risks identified on the tracker were relevant to the Committee and its work.
- 5.2. ASa explained the purpose of the paper, pointing to the mapping of risks and issues to current programmes and highlighting the areas that are relevant to the Committee's work. The Committee agreed that the paper reassures that most of the risks and issues identified in the tracker were being addressed by ongoing workstreams but some of the risks and issues not covered may be tackled by wider work by other bodies associated with the Strategic Panel's roadmap to a flourishing market.
- 5.3. The Committee noted that Water Efficiency and Rainwater Management are not included in the performance framework. Whilst these were agreed to be important market outcomes, it is an area that the Strategic Panel is addressing through activities related to its "Roadmap to a Flourishing Market".
- 5.4. It was agreed that MOSL will circulate the latest update on the actions from the Panel's Roadmap work. The draft Trading Party Audit Plan for 2026-27 will make references to the routes to resolution discussed here. The draft Plan will be presented at PAC16 in February 2026 and if the Committee need more information on any gaps, it was proposed that this could be picked up at that point.

**ACTION: A14\_02**

5.5. The Chair thanked ASa for the update.

## 6. Tabled Updates

- 6.1. The Committee noted the Tabled Updates paper detailing the work of Panel and its committees. The Code Change Committee recommended the code change [Estimated Transfer Reads \(CPW159\)](#) to Ofwat, which seeks to clarify when an estimate can be used instead of an actual read by a retailer or customer when a customer switches. The Committee may see some impacts from this in due course.
- 6.2. The Committee approved the minutes for PAC13 (November 2025) as an accurate record of the meeting. A public version of the minutes will be added to the MOSL Website.
- 6.3. The Committee agreed to close actions: A13\_01, A13\_02, A13\_03, A13\_04 and A13\_06.
- 6.4. The Committee agreed that the following actions would be carried forward: A02\_03, A05\_03, A09\_03, A12\_02 and A13\_05. Relating to A02\_03, the Committee noted that the MOSL Governance Team will be looking both the upcoming Wholesaler PAC member recruitment and the need to find alternates for the Strategic Panel Committees. Further updates will be shared in due course.
- 6.5. The Committee heard from the Customer Representative member about the CCW quarterly complaints report. There was a 22% increase in complaints to CCW from Quarter 1 (April to June 2025) to Quarter 2 (July to September 2025). Complaints to retailers had seen a 1% reduction across the same period. Areas of concern were debt recovery and back-billing. It was noted that some of these issues could be influenced by cost of living pressures as this can impact on complaint trends. CCW will continue to provide the committee with this data at regular intervals.

## CLOSED SESSION

### MEMBERS PRESENT

Claire Whyley	CW	Chair	Tanya Sephton	TS	Wholesaler Representative
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Lindsey Fussell	LF	Independent Member	Jesse Wright	JW	Wholesaler Representative
Keith Richards	KR	Independent Member	Andrew Smith	AS	Retailer Representative
Adam Boyns	AB	Customer Representative	John Spreadbury	JS	Retailer Representative
Sam Dawson	SD	Wholesaler Representative	Robert Hetherington*	RH	Ofwat Representative

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#### OTHER ATTENDEES

Adam Richardson	AR	Panel Secretary	Axelle Saada	ASa	MOSL Presenter
Sam Webb	SW	MOSL Presenter	Nichola Sampford	NS	MOSL Secretariat

#### APOLOGIES

Sarah McMath	SM	MOSL CEO	Ben Kershaw	BK	Retailer Representative
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## 7. Welcome and Apologies

- 7.1. The Chair welcomed attendees to the closed session and noted that apologies had been received from BK and SM.
- 7.2. The Chair reminded Committee members of the requirement to act impartially and not in the interest or as a representative of any organisation or individual. If Committee members believed they had an actual or perceived conflict they should declare this at the start of the meeting or before an agenda item.
- 7.3. It was confirmed that the meeting was quorate.

## 8. Trading Party Audit

- 8.1. The Committee was asked to comment on the Gap Sites Audit Findings (Confidential version). An anonymised version was shared in the public papers for this meeting.
- 8.2. Members noted the importance of having clear and consistent definitions of gap sites across the market given the impact on back billing arrangements. Members were supportive of the best practice route for the relevant recommendations but noted that elements of best practice could be formalised through a code change later on if this was beneficial to the market.
- 8.3. Following the discussion the Committee:
  - **AGREED** (Unanimously) to endorse the approach to explore a code change and to publish guidance on the handling of gap sites in the interim.
- 8.4. The Chair thanked ASa for her presentation.

## 9. Tabled Updates and Review of Holistic Performance (MPF1.0)

- 9.1. The Committee received an update on the current Market Performance Framework (MPF1.0) noting that no Letters of Concern had been issued.

## 10. Tabled Updates and Review of Holistic Performance (MPF2.0) with potential changes to the Triggers for Letters of Concern

- 10.1. The Committee discussed current thinking on Holistic Tables and possible escalations to consider in January, including triggers for Retailers and Wholesalers.
- 10.2. The proposal, shared with the Committee prior to the meeting, would be to consider a Large Wholesaler for escalation if 3 metrics appeared in the bottom quartile of the performance tables (other than R-MeX, B-MeX and M15). For Small Wholesalers all metrics except M15 would be included, considering the Wholesaler for escalation if 3 metrics appeared in the bottom quartile of the performance tables. (In all cases for a period of 3 consecutive months)
- 10.3. For Large Retailers, Small Retailers, Self Supply and NAVs, all metrics other than M06 and M09 included, with a trading party being considered for escalation if 2 metrics appeared in the bottom quartile of the performance tables for 3 consecutive months.

- 10.4. The Committee, in its discussions, was keen to avoid weakening standards as this may appear to undermine the purpose of the new market performance framework. Additionally, the Committee was keen to retain some flexibility, particularly with regard to early intervention where a trading party has been performing poorly against the metrics throughout shadow.
- 10.5. The triggers for a Letter of Concern will identify candidates and not automatically issue the letters. Early letters should include a context note acknowledging the fact that the metrics are new and escalation decisions will remain proportionate and be applied with consideration.
- 10.6. With regards to the M09 (proportion of actual transfer meter readings) metric, members of the Committee felt that, because of its nature as a measure for impact to the end-customer, it should not be de-emphasised. It was noted and agreed that, even if it was removed from the triggers, it must still be scrutinised, considered and referenced in letters where concerns around performance arise.
- 10.7. The Committee acknowledged the risk that issuing more Letters of Concern may dilute the impact of these letters and the escalation process.
- 10.8. Following the discussions, the Committee:
- **AGREED** (by majority, 8 for, 1 against) to remove the metrics as SW had proposed that automatically trigger Letters of Concern. Further, as set out above, the Committee requested that due to its impact on the end-customer, poor performance against the M09 metric would be raised with trading parties and could trigger a manual Letter of Concern
  - **AGREED** (Unanimously) to the proposal to not automatically issue Letters of Concern and add context notes as detailed above to acknowledge the new performance assessment landscape.
  - **AGREED** (Unanimously) to retain the three-month trigger structure for now, but to retain flexibility to send or withhold letters based on context, as well as using letters issued to drive early engagement and reinforce expectations.
- 10.9. SW will revise and circulate the updated wording for review.

## 11. Trading Party One Performance Review

- 11.1. The Committee received an update on Trading Party One's performance against its PRP and next steps before they come in next month following its decision at PAC13 in November to request a revised plan from Trading Party One.
- 11.2. The Committee noted that performance remains poor, although it is improving in some areas and should continue to show progress in the next few months if it continues on this trajectory. It was confirmed that representatives from Trading Party One would attend PAC15 in January 2026.
- 11.3. The Committee was assured that escalation in this case had resulted in positive progress against the metrics and whilst there remained concerns about performance, there is evidence of improvement and better engagement from Trading Party One.
- 11.4. The Chair thanked SW for the update.

## 12. Trading Party Two

- 12.1. The Committee received confirmation that Strategic Panel had formally escalated Trading Party Two to Ofwat and that the letter detailing this escalation had been received by the Regulator. It was also confirmed that no request for a volume transfer (usually received on the sale of a trading party's book) had been received by MOSL, indicating that the sale of Trading Party Two's book was still pending.

## 13. AOB incl. Reflections on the Meeting

- 13.1. The Committee was asked if there was any other business to discuss and it was confirmed that there was none.
- 13.2. The Committee reflected on the meeting.
- 13.3. There being no further business, the Chair closed the meeting.