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## CPW157–Summary of Stakeholder Responses - Public

This document sets out the responses received from all 21 respondents to the Consultation for CPW157 conducted between 27 June 2025 and 14 July 2025. The respondents to the consultation were:

Group	Number of responses
Wholesalers	10
Retailers	10
Other	1
<b>Total</b>	<b>21</b>

Wholesalers	Retailers	Other
Affinity Water Limited	ADSM-R	CCW
Dwr Cymru	Business Stream	
Northumbrian Water Ltd	Castle Water	
Portsmouth Water	Conservaqua	
South East Water	Everflow	
South West Water	Pennon Water Services	
Thames Water	Veolia Water Retail (UK) Limited	
United Utilities	Water plus	
Wessex Water	water2business limited	
Yorkshire Water	Wave	

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## 1. Summary of the Stakeholder Responses

This section sets out a summary of the 21 responses received to each of the 14 consultation questions, with the full consultation responses set out in section 2.

Question 1: Question 1. Are you experiencing the problem articulated by CPW157's problem statement? Please explain.

Out of the 17 respondents:

- **11 IMPACTED** (5 Wholesalers and 6 Retailers);
- **3 NOT IMPACTED** (2 Wholesalers, 1 Retailers); and
- **3 OTHERS** (1 Wholesalers, 1 Retailers, and 1 Others)

### Impacted

#### Wholesalers:

Portsmouth Water noted they lack tools to verify settlement runs but observed G reads being deleted and not replaced, suggesting they are affected. Southwest Water confirmed encountering the issue, especially when G reads are removed and settlement re-runs are requested. United Utilities reported no changes yet but acknowledged the risks of deleting old data. Wessex Water expressed concerns about data storage, which their IT team is reviewing in preparation for Smart Metering. Yorkshire Water said they are indirectly impacted, citing a rise in post-RF refund requests due to inaccurate meter read data in CMOS, and criticized current market incentives for not promoting data quality improvements.

#### Retailers:

ADSM have a small number of supply points and have not come across the situation stated within the problem statement. However, they believed there may be situations in the future where extended read histories may be useful. Business Stream agreed with the problem statement and believed that long standing issues with the market data persist which may require them to access older historical data to make corrections back to market opening. They mentioned that their experience in Scotland demonstrates the ongoing need for data access extending back to market opening in 2008 and therefore believe that licensed providers should have access to this data.

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Castle agreed with the problem statement, noting they often rely on meter reads older than seven years to support accurate billing. Losing this data would negatively impact their ability to resolve disputes and justify billed consumption. Covservaqua stated that they have had several cases where the availability of pre 2017 meter reads from CMOS have aided the understanding of long term incorrect historical charging and have needed the data to correct the issue. Water Plus confirmed the issue, stating that deleting reads over seven years old could impact [X] SPIDs and risk [X] in charges. The problem is widespread, not limited to a few cases. Water2business also believe they could be impacted by this. Wave expect to be negatively impacted by a scheduled deletion of data particularly when accurately forecasting and negotiating post RF recovery beyond 44 months with the wholesalers.

**Not Impacted**

**Wholesalers:**

Affinity water stated that credit charges going back over seven years are typically linked to deregistration and may rely solely on settlement data, with no need to recalculate metered consumption. Dwr Cymru mentioned that they have very few supply points and have not faced the same issues other trading parties.

**Question 2: How many SPIDs still subject to settlement (planned or unplanned settlement runs) do you have that would be affected by the policy of deleting reads older than seven years?**

Out of the 14 respondents:

- **7 Affected** (3 Wholesalers and 7 Retailers);
- **7 Zero or unknown** (6 Wholesalers and 1 Retailer)

**Affected**

Wholesaler	Estimated SPIDs affected	Comments
A	Approximately 300	
B	Around 2000	These are SPIDs with only G-reads for the previous 16 months

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C	140,000 affected SPIDs 2,600 pre-market opening long unread meters 12,000 long unread meters with unknown impact.	Estimated £5.5m absolute financial impact (a net of -£2.5m), the data has been analysed by their solutions provider but is unverified.
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Retailer	Estimated SPIDs affected	Comments
A	Not provided	A refund on the latest quarterly settlement was requested on SPIDs older than seven years.
B	Cannot be forecasted	There may be a requirement to remove meter reads in the future that will result in the impact of deleting data over 7 years.
C	Based on a meter read deletion removing all reads prior to the 1st of July 2018, 48 SPIDs would still have their charges impacted within the RF period.	

Zero on Unknown

Wholesaler	Estimated SPIDs affected	Comments
D	0	No Impact reported
E	Unanswerable question	Noted that it could be any SPID depending on the metering issue.
F	Unknown	There is no mechanism to check settlement runs

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G	Unknown	The number of SPIDs affected is unclear, however steps have been taken to mitigate any unforeseen circumstance
H	Unknown	They lack tools and resources to confirm
I	Unknown	They lack tools to calculate

Retailer	Estimated SPIDS Affected	Comments
D	Unable to quantify	They believed with data deletion, there could be an issue in settlement and reconciliation

Question 3: What is the cost impact on you if the settlement invoices for these SPIDs are re-calculated?

Out of the 13 respondents:

- **7 REPORTED IMPACT** (3 Wholesalers and 4 Retailers);
- **2 MINIMAL IMPACT** (2 Wholesalers); and
- **4 OTHER** (2 Wholesalers and 2 Retailers)

**REPORTED OR ESTIMATED A COST IMPACT**

**Wholesalers:**

Several wholesalers acknowledged a potential cost impact. Southwest Water noted that while exact costs are unknown, re-runs could trigger further corrective actions with unquantifiable costs. United Utilities stated that the cost would depend on the outcome of CPW152, potentially increasing administrative and resource burdens. Yorkshire Water referred to past analysis showing offsetting overcharges and undercharges but expressed concern that the current market approach under CPW152 may not allow for balanced corrections.

**Retailers:**

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Among retailers, Water2business and Wave reported an impact and warned of continued disruption in future forecasts. Waterplus reported minimal settlement costs but highlighted risks of double charging

### MINIMAL OR NO COST IMPACT

Affinity Water expected minimal costs due to the limited scope of re-runs, which would only incur MOSL's standard charges. Southeast Water agreed that the impact would likely be minimal, as historical data beyond seven years is rarely reviewed.

### Other

Several wholesalers, including Portsmouth Water and Wessex Water, were unable to assess the cost impact due to limitations in tools and tracking capabilities. Wholesalers generally cited uncertainty stemming from data limitations and lack of clarity around market processes. Among retailers, most found it difficult to quantify the impact. Conservaqua and Pennon either could not provide figures or deemed the question unanswerable.

**Question 4: If a historical read is deleted, do you recalculate charges in the dead zone? If so, how many SPIDs in the dead zone would be affected?**

Out of the 18 respondents:

- **11 YES** (5 Wholesalers and 6 Retailers);
- **2 NO** (2 Wholesalers); and
- **5 OTHER** (2 Wholesalers, 3 Retailers)

### Yes

#### Wholesalers:

Most wholesalers mentioned that they only recalculate charges if prompted by retailers or for SPIDs they are actively managing. South West Water noted that they recalculate all charge-impacting changes immediately, while United Utilities and Wessex Water adjust in post-RF or dead zone periods but find quantifying the number of SPIDs that may get impacted, difficult.

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### Retailers:

Most retailers confirmed they recalculate charges in the dead zone to ensure billing accuracy. Castle Water adjusts costs and processes refunds for retired or changed reads, while Conservaqua currently sees [X] cases but expects numbers may rise with improved data quality. Waterplus proactively refunds customers and simulated significant potential exposure from deleting older reads. Wave noted that they process backdated claims spanning the dead zone to maintain fair outcomes.

### NO

Amongst wholesalers, South East Water and Yorkshire Water generally do not recalculate dead zone charges, except for exceptional cases like surface water drainage.

### OTHER

Several wholesalers, including Dwr Cymru, and Thames, provided no specific comments. Some retailers, including Everflow, and Pennon provided no specific comments.

**Question 5: Do you have other concerns regarding the deletion of meter read data older than seven years e.g. data usage, settlement, compliance?**

Out of the 18 respondents:

- **16 YES THERE ARE CONCERNS** (8 Wholesalers, 7 Retailers, and 1 Others);
- **2 NO OTHER CONCERNS** (1 Wholesalers, 1 Retailers); and

### YES THERE ARE CONCERNS

#### Wholesalers:

Wholesalers emphasised the importance of retaining meter reads older than seven years for volumetric adjustments, settlement accuracy, and customer history. Affinity Water and Thames Water cautioned that deleting these reads may corrupt seasonal consumption patterns and hinder investigations due to gaps in data. South West Water noted that historical reads are vital for water efficiency initiatives and market

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analysis. United Utilities highlighted risks of discrepancies in future recalculations and the need to align with CPW152 and smart metering demands. Wessex Water and Yorkshire Water noted that data deletion would expose issues with insufficient actual reads over time, affecting billing accuracy.

### **Retailers:**

Retailers stressed the importance of retaining historic meter read data for accurate billing, settlement recalculations, and customer dispute resolution. ADSM-R and Castle Water highlighted its integral role in validating charges and ensuring customer confidence. Business stream carried out a case study on a SPID. They stated that their main concern is that deleting data older than seven years may hinder trading parties' ability to take corrective action related to poor market data at inception.

Conservaqua emphasised the use of older data in water efficiency, leakage detection, and supporting ESG reporting, warning against losing this data amid growing smart metering volumes. Pennon noted that settlement charges can still be reconciled after seven years, making deletion risky. Waterplus and Wave raised concerns about impacts on water efficiency analysis and customer trust, while also acknowledging the need to balance retention value against storage costs.

### **CCW:**

CCW strongly supports retaining meter read data older than seven years, warning that deletion could harm billing accuracy, especially for customers with few actual reads. They highlighted potential risks of substantial erroneous refunds, increased disputes, and customers being unable to claim historic overpayments. Given that billing disputes are a major source of complaints, CCW stresses that removing this data would negatively impact customer trust and market stability.

### **NO CONCERNS**

Wholesaler, Portsmouth water are aware of the situation but do not have the capacity to act on it currently. Retailer water2business do not have any other concerns.

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Question 6: Do you insert historic reads after removing G reads? Please explain.

Out of the 14 respondents:

- **11 YES** (4 Wholesalers and 7 Retailers);
- **3 NO** (2 Wholesalers and 1 Retailers)

### **YES**

#### **Wholesalers**

Most wholesalers mentioned that they rarely removed or inserted historic reads, prioritising settlement consistency. Affinity Water only inserted Wholesaler reads and removed G reads on rare retailer request, while Portsmouth and United Utilities replace G reads with actual reads to improve accuracy.

#### **Retailers:**

Most retailers stated that they rarely insert historic reads after removing G reads, doing so only to ensure accurate billing when more accurate data becomes available. Business Stream and Castle Water replace G reads with actual or historic reads to correct consumption across tariff years after coordinating with wholesalers. ADSM-R and water2business noted such cases are extremely rare, while Waterplus and Wave only act when G reads conflict with newer or more accurate readings.

### **NO**

#### **Wholesalers:**

South East Water avoids such changes entirely, and South West Water does so only in exceptional cases. Dwr Cymru, Thames, and others reported minimal or no activity in this area.

#### **Retailers:**

Pennon stated they do not insert historic reads, and Conservaqua noted that it depends on circumstances.

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Question 7: What operational steps are you taking to obtain meter reads that can be used to replace G-reads? What proportion of G-reads have been replaced with customer-submitted or visual reads since market opening?

Out of the 16 respondents:

- **6 Active replacement** (3 Wholesalers and 3 Retailers);
- **3 Limited or conditional replacement** (1 Wholesalers and 2 Retailers); and
- **7 Minimal activity or no comment** (5 Wholesalers and 2 Retailers)

### ACTIVE REPLACEMENT

#### Wholesalers:

Portsmouth Water often finds actual reads in their systems at the same time as G-reads, as most meter reads in their own systems are passed on to retailers. South West Water and United Utilities are actively tackling long-unread meters (LUMs) through retailer collaboration, targeted reviews, and smart metering upgrades to reduce reliance on G reads. South West Water also shares insights with retailers to resolve access issues and improve read rates.

#### Retailers:

Business Stream and Castle Water mentioned that they actively use customer, AMR(drive by meters), and wholesaler data or work with customers to obtain historic reads to improve accuracy. Conservaqua also stated that they leverage historic customer reads and interpolates data where needed.

### LIMITED OR CONDITIONAL REPLACEMENT

#### Wholesalers:

Affinity Water noted they only insert Wholesaler reads, as replacement of generated reads is dependent on retailers, the exact numeration of G-reads is unknown.

#### Retailers:

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Waterplus and Wave have remarked that replacing G reads with historic data is often not feasible, focusing instead on obtaining current reads to resolve long-unread meters.

### MINIMAL AVTIVITY OR NO COMMENT

#### Wholesalers:

Other wholesalers provided limited or no comments.

#### Retailers:

Pennon stated they do not look back at retrospective reads, while several retailers provided limited or no comments.

### Question 8: How much will it cost you to re-insert historic reads to avoid customer bills being affected?

#### Out of the 12 respondents:

- **3 Cost Identified** (1 Wholesalers and 3 Retailers,);
- **9 Hard to Quantify** (4 Wholesalers, 5 Retailers); and

### COST IDENTIFIED

#### Wholesalers:

South West Water noted that it is embedded within standard business-as-usual activities

#### Retailers:

Water2business estimated a couple of days of operational effort. Waterplus highlighted that while inserting a single read is inexpensive, managing the overall process would be significant. Wave emphasized that read gathering itself is a major cost driver.

### HARD TO IDENTIFY

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### Wholesaler:

Most wholesalers were unable to provide a measurable impact. Affinity Water and Portsmouth Water have reported it as unknown, while. Other wholesalers provided no specific comments or data.

### Retailer:

Retailers generally found that the cost of handling G read removals is hard to quantify, as it may vary by case and complexity. Business Stream and Castle Water did not provide figures, while Conservaqua noted costs go beyond operational overhead.

Question 9: Would the deletion of CMOS meter read data older than 7 years old affect your ability to respond to customer billing queries or refund claims? Please explain.

Out of the 13 respondents:

- **13 AGREED** (5 Wholesalers and 8 Retailers)

### Agreed

#### Wholesaler:

Several wholesalers warned that removing historic reads could create gaps in data and impact key processes. Portsmouth Water noted that there is a difference between their internal data and CMOS, while South West Water highlighted risks to leak allowances, charge corrections, and volumetric adjustments. Thames Water and United Utilities cautioned that missing data could lead to settlement disputes and require changes to assessment processes. Wessex Water emphasized the need for retailers or wholesalers to ensure data retention if MOSL deletes older reads.

#### Retailer:

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Retailers agreed that deleting meter read data older than seven years would significantly hinder their ability to resolve customer disputes and ensure accurate billing. Business Stream and Castle Water stressed its importance for investigating historic issues, including ongoing complaints dating back to market opening and even litigation cases. Conservaqua highlighted that losing CMOS access would slow or prevent dispute resolution, damaging customer relationships. Waterplus, Wave, and water2business warned of impacts on refunds, leak allowances, and collections, while Pennon noted historic data is crucial for supporting dispute arguments. Overall, retailers see data retention as essential for accurate billing, credits, and customer trust.

**Question 10: If the deletion of CMOS meter read data older than 7 years old will affect your ability to respond to customer billing queries or refund claims, how much will that cost your organisation?**

Out of the 16 respondents:

- **16 NOT QUANTIFIABLE** (7 Wholesalers and 9 Retailers)

### **NOT QUANTIFIABLE:**

#### **Wholesaler:**

Most wholesalers were not able to quantify the impact of deleting historic reads which would hinder their ability to respond to billing queries or refund claims. South West Water said it depends on the volume and value of cases, while Portsmouth and Wessex Water reported unknown costs. Thames Water warned of increased disputes if trading parties lack a single agreed data source, requiring wider code changes. United Utilities highlighted risks of longer investigation times, higher costs, and reputational damage from delays in resolving customer queries and refunds.

#### **Retailer:**

Retailers largely could not provide exact figures but agreed the financial impact of deleting historic reads would be substantial. Business Stream projected significant costs, while Castle Water estimated losses in the seven-figure range. Waterplus mentioned that the exposure could be well into several million pounds and cautioned risks to their proactive refund approach. Conservaqua highlighted both financial

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impacts and the intangible cost of damaging customer relationships. Most others, including Pennon and water2business, said the impact is currently unquantifiable.

Question 11: If historic readings older than 7 years are deleted as per CSD 0400 section 7.5.1 , would your organisation need additional time or support to prepare for this change? If so, how much time and what kind of support?

Out of the 15 respondents:

- **14 TIME OR SUPPORT NEEDED** (8 Wholesalers, 6 Retailers)
- **1 NO SUPPORT NEEDED** (1 Retailer)

### **TIME OR SUPPORT NEEDED**

#### **Wholesalers:**

Wholesalers emphasised that there is a need for clear processes and data extracts if historic reads are deleted. Affinity Water and Portsmouth Water requested accurate SPID-level files to retain read history, while Wessex Water suggested MOSL employ FTP archiving. South West Water estimated a nine-month data cleanse with enhanced CMOS reporting, and South East Water recommended 3–6 months to capture risks. Thames Water stressed the need for a final data share mechanism, and United Utilities opposed deletion due to the complexity of settlement recalculations and required IT changes. Yorkshire Water raised concerns over increased Post-RF refund requests and the impact on system accuracy.

#### **Retailers:**

Retailers stressed the need for strong mitigation and data retention plans if historic reads are deleted. Business Stream requested time and support to download affected reads, while Castle Water warned that creating individual databases would be significantly costly and removal of data from CMOS would be risking the loss of a single source of truth. Conservaqua suggested an annual MOSL-provided archive and equal access for new entrants. Pennon noted potential system and staffing challenges, while Waterplus cautioned that deletion without mitigation would create ongoing financial exposure. Wave called for a market-wide solution rather than isolated fixes.

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### NO SUPPORT NEEDED

#### Retailer:

Water2business said they would not need extra time or support to implement changes should data be deleted as per CSD 0400 section 7.5.1

Question 12: Which of the following options is your preferred solution as Section 1.8? Why?

Out of the 17 respondents:

- **0 selected Pre-deletion copy and targeted removal (Option I)** (0 Wholesalers, 0 Retailers, and 0 Others);
- **2 selected Seven years plus one read retention (Option II)** (1 Wholesalers, 1 Retailers, and 0 Others)
- **2 selected Synthetic “lock-in” read at deletion point (Option III)** (1 Wholesalers, 1 Retailers, and 0 Others)
- **0 selected MOSL delays the deletion of the data by 6 months, to allow trading parties to insert/ rectify historical reads to ‘lock in’ the gradient for volume estimation (Option IV)** (0 Wholesalers, 0 Retailers, and 0 Others)
- **8 selected Paying the cost to retain data in CMOS (as in section 1.8.2) on a permanent basis (with the risk of CMOS running slower etc) (Option V)** (3 Wholesalers, 5 Retailers, and 0 Others)
- **1 selected Removing the historic meter reads when they are older than 7 years (as per CSD 0400 section 7.5.1) (Option VI)** (1 Wholesalers, 0 Retailers, and 0 Others)
- **4 selected None** (2 Wholesaler, 1 Retailer, 1 Other)

### OPTIONS II, III, V, VI

#### Wholesalers:

Wholesalers showed mixed preferences for the proposed options. Affinity Water found Options **I–III** too complex and favoured **V or VI** but could not give a definitive preference. South East Water supported a synthetic lock-in if settlement integrity is maintained, while South West Water, Thames Water, and United Utilities preferred **Option V** (with Thames suggesting a centrally funded archiving variant). Wessex Water

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leaned toward **Option VI** with market code review, and Yorkshire Water considered **Option II** most viable but requested deeper analysis of long-term impacts. Several wholesalers noted the need to balance cost, data retention, and settlement accuracy.

### Retailers:

Retailers overwhelmingly favoured **retaining data in CMOS permanently (Option V)** and cited long-term data integrity. One retailer urged MOSL to adopt a similar strategy as the Scottish data retention model, to reduce risk of settlement errors and disputes. Several stressed that a cost-benefit analysis should precede implementation but noted shared costs would be minor compared to the impact of losing data. As secondary options, many supported **pre-deletion copy and targeted removal (Option I)** and **Seven Years plus one read retention (Option II)** to preserve consumption history. Some suggested combining these with a **synthetic lock-in read (Option III)** to mitigate gaps.

### Other:

CCW supports retaining meter reads older than seven years but rejects their permanent storage in CMOS due to potential system performance impacts. They oppose **options IV–VI** and stress the need for a centralised MOSL-led solution rather than individual trading party fixes. CCW favours further exploration of **options I–III** but withholds a final preference until their practicalities and impacts are fully assessed.

### None

A few wholesalers such as South East Water and retailer Conservaqua rejected all current proposals without further cost and operational impact clarity, while most agreed that options ensuring accurate consumption trends without adding heavy operational burden are critical.

## Question 13: Do you have any other solution in mind to suggest?

### Out of the 18 respondents:

- **12 YES** (5 Wholesalers and 7 Retailers);
- **6 NO** (4 Wholesalers and 2 Retailers)

### YES

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### Wholesalers:

Wholesalers suggested limited alternative solutions. Affinity Water recommended providing each trading party with a file of deleted reads, while Thames Water proposed a MOSL-managed archive separate from the live system to avoid performance issues. United Utilities suggested retaining only data that still impacts recent settlement periods via an overlay analysis. Yorkshire Water supported combining backup storage with extended retention and highlighted the need to address the underlying lack of meter reads in CMOS. Wessex Water proposed reviewing removal of non-chargeable data items instead. Most other wholesalers had no additional suggestions.

### Retailers:

Retailers suggested several alternative approaches to managing historic meter reads. ADSM-R proposed storing a lightweight archival record of reads without transactional data to reduce costs. Business Stream recommended MOSL collaborate with the Scottish CMA to learn from their long-term data retention model. Conservaqua and Castle Water supported creating an external archive, though Castle warned targeted removal risks deleting the wrong reads. Water2business advised exploring scalable storage solutions in preparation for smart metering. Wave suggested aligning retention with the 9-year rule under S14A (of the Limitation Act 1980) to support customer claims. Other retailers had no additional proposals.

## Question 14: Do you have any further comments?

### Out of the 19 respondents:

- **11 YES** (4 Wholesalers, 6 Retailers, and 1 Others);
- **8 NO** (5 Wholesalers and 3 Retailers)

### YES

#### Wholesaler:

Thames Water urged MOSL to assess impacts on Legacy Long Unread Meters and long-term vacant sites. United Utilities questioned whether MOSL had modelled the changes centrally and opposed deletion until settlement strategy reviews and smart metering rollout are further along. Wessex Water stressed the need to clarify market codes and settlement rules beyond seven years to avoid inconsistency. Yorkshire

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Water flagged potential distortions from 2020 COVID data affecting long-term averages and suggested CMOS may need a broader review as the market grows. Several noted that full smart meter deployment would eventually mitigate these issues.

**RETAILER:**

Retailers stressed that deleting meter read data older than seven years would harm billing accuracy, dispute resolution, and long-term trend analysis. Business Stream and Castle Water warned it would undermine data integrity, refunds, and debt collection, while Conservaqua and Waterplus highlighted the customer impact and settlement risks. Everflow noted the loss of historical trends could hinder sustainability initiatives and supported exploring a synthetic “lock-in” read as a mitigation. Several retailers, including water2business and Wave, emphasised balancing storage cost reduction with maintaining settlement confidence and preparing for the larger data demands of smart metering.

**OTHER:**

CCW emphasised the need for a centralized solution to retain meter read data older than seven years and urged trading parties to use existing processes to insert actual retrospective reads. They raised concerns over system-generated reads being deleted without replacement and called for stronger market codes to ensure accurate settlement and billing.

**2. Full List of Consultation Responses**

This section provides the full set of responses received in the stakeholder consultation for CPW154.

**Question 1. Are you experiencing the problem articulated by CPW157’s problem statement? Please explain.**

Wholesalers	
Affinity Water Limited	Not entirely. Generally, if a credit is to be raised this far back it is likely due to deregistration, so we only use settlement data to produce the credit value. We have not come across an instance where metered consumption needed to be recalculated over 7 years old.
Dwr Cymru	No we have a very small number of SPIDs in the market to not experienced the issues other TPs have
Northumbrian Water Ltd	Not Answered

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Portsmouth Water	We have no mechanism to check settlement runs in this manner, so whilst unable to provide evidence we are being impacted by this issue, we noticed G reads being deleted and not replaced and we would therefore assume we are impacted.
South East Water	[REDACTED]
South West Water	Yes, we have come across examples of this problem. Typically, this is when G reads are removed and settlement re-runs are requested.
Thames Water	No comment
United Utilities	No changes have been implemented at this stage, so there is no direct experience to report. However, we acknowledge the potential risks associated with deleting data, even if it is over seven years old.
Wessex Water	Yes. Storing of data is a concern which our IT department are currently reviewing as also preparing for Smart Metering.
Yorkshire Water	Indirectly; Yorkshire Water have seen a sharp increase in Post-RF refund requests in the last year – a significant cause of them is the issue flagged in the problem statement. However, we believe the root cause is the lack of accurate meter read data in CMOS. It is our view that the current incentives in the market do not drive all trading parties to enhance data, and we would have concerns that this solution does not seem to move in that direction either.
<b>Retailers</b>	
ADSM-R	Not to our knowledge currently - we have a small number of spids where we have had to delete G reads, can foresee scenarios where extended read history would be useful though.
Business Stream	Yes, we agree with the problem statement. Long-standing issues with market data persist, requiring us to access historical data to make corrections dating back to market opening. These scenarios include: <ul style="list-style-type: none"> <li>• Ongoing complaints</li> <li>• SPID Deregistrations</li> <li>• Transfers</li> <li>• Meter switching between SPIDs</li> <li>• SPID component service changes</li> </ul>

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	<ul style="list-style-type: none"> <li>• SPIDs still subject to settlement</li> </ul> <p>Meter read data is essential for appropriately apportioning charges as part of corrective actions. Our experience in Scotland demonstrates the ongoing need for data access extending back to market opening in 2008. Therefore, data older than seven years must remain accessible to Licensed Providers (LPs).</p>
Castle Water	Yes, we agree with the problem statement. We frequently are reliant on reads over seven years old to support customers' consumption and accurate billing. The loss of data to backup customer billing would be detrimental if being disputed as it would hinder our ability to provide backup for consumption billed. This would likely lead to an increase in costs to serve customers and to bad debt and write offs. Meter reads over seven years old are also frequently used to support settlement cost refunds
Conservaqua	We have had several cases where the availability of pre 2017 meter reads from CMOS have aided the understanding of long term incorrect historical charging and to derive re-calculation to correct the issue. As the removal of reads will be on a rolling basis, we will inevitably require to refer to post 2017 reads to manage similar issues
Everflow	No comment
Pennon Water Services	This is not a significant issue for PWS, but we envisage that there are scenarios where In principle we could be negatively impacted by not being able to access data over seven years old. PWS are therefore supportive of the proposed change proposal to extend the period that data is retained in CMOS beyond the current seven years. The change to keep meter read data for longer makes sense, it should help avoid billing issues in older disputes and supports our obligations to customers beyond the settlement window.
Veolia Water Retail (UK) Limited	Not Answered

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Water plus	<p>Yes, Water Plus are experiencing the problem articulated by the Problem Statement. In the Water Plus portfolio, there are SPIDs where the historic trajectory of customer consumption would be materially impacted by the deletion of reads beyond 7 years that could potentially lead to inaccurate settlements and billing. As evidenced in the table in response to question 4, after simulating the removal of data from prior to the 1st of July we can see that [REDACTED] SPIDs would be affected in the month of July 2019 with a value of [REDACTED] in Wholesale charges that could potentially be reclaimed if the impact of data deletions was not accounted for.</p> <p>We have included two specific case studies in response to question 14 below, however this issue is significantly more widespread than these two examples.</p>
water2business limited	[REDACTED]
Wave	We expect to be impacted negatively by a scheduled deletion of data particularly when accurately forecasting and negotiating post RF recovery beyond 44 months with Wholesalers. Given the Code Change Committee’s approval of CPW152, the current rule of deleting all reads over 7 years will need to be amended, so accurate volume calculation and associated charges can be arrived upon for periods that will require offline refunds.
<b>Other</b>	
CCW	N/A

**Question 2: How many SPIDs still subject to settlement (planned or unplanned settlement runs) do you have that would be affected by the policy of deleting reads older than seven years?**

[REDACTED]

**Question 3: What is the cost impact on you if the settlement invoices for these SPIDs are re-calculated?**

**Wholesalers**

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Affinity Water Limited	In terms of the consumption charge, this is unknown as these are long term LUMs, but as Wholesalers can only re-run the most recent 8 RF periods, the impact is likely to be low. In terms of costs, this would be the MOSL re-run charge x 8.
Dwr Cymru	
Northumbrian Water Ltd	
Portsmouth Water	Unknown as we have no mechanism to check settlement runs in this manner or forecast the monetary value.
South East Water	Calculations would be via off-market adjustments and require the evidence of the CMOS data. For most cases data beyond 7 years will never need to be reviewed again.
South West Water	We're unable to confirm the exact value at this stage, as re-running these periods is likely to trigger further corrective actions and associated costs, which cannot currently be quantified. This is due to historic, case-specific actions or agreements previously made to resolve issues related to individual SPIDs.
Thames Water	No comment
United Utilities	The potential impact will depend on the forthcoming decision regarding CPW152. If Trading Parties are required to establish reconciliation processes outside of the market framework, this could introduce additional administrative and operational costs. Conversely, recalculating historical data through existing market and CMOS processes may also result in significant resource implications.
Wessex Water	Unfortunately, we are not able to confirm the cost impact, as we do not have the tools or resource available for this exercise.
Yorkshire Water	A recent detailed analysis going back to market opening showed that the overcharges are generally offset by undercharges, so the overall position for us is neutral. Unfortunately the current approach being taken by the market (CPW152) is pushing more to limit and refund overcharges but not allowing for the undercharges to offset these.
<b>Retailers [REDACTED]</b>	
<b>Other</b>	
CCW	N/A

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Question 4: If a historical read is deleted, do you recalculate charges in the dead zone? If so, how many SPIDs in the dead zone would be affected?

Wholesalers	
Affinity Water Limited	Only if a Retailer approaches us to do so in order to raise a credit. This would then be subject to re-run/policy thresholds.
Dwr Cymru	No comment
Northumbrian Water Ltd	Not Answered
Portsmouth Water	Only if it is a SPID we are proactively dealing with. If a retailer deleted historical reads without notifying us or if a SPID was not being 'personally' handled, it is unlikely to be flagged for investigation.
South East Water	We don't currently recalculate for deadzone period. See answers questions 1 and 2.
South West Water	Our process is that we do not wait for the deadzone, we recalculate all charge impacting changes at point of acceptance and then an out of CMOS adjustment is made.
Thames Water	No comment
United Utilities	Depending on the nature of the meter read change and the agreements in place with Trading Parties, we do recalculate charges for consumption changes occurring in post-RF and deadzone periods. However, quantifying the scale and financial impact of such recalculations remains challenging.
Wessex Water	We currently offer refunds in the deadzone. As these are off-line, we can recalculate the new charges. Sometimes this has proven difficult as we do not subscribe to these external suppliers who offer software packages such as Trevi and Valytica who have built tools for this purpose. Therefore, we are unable to confirm how many spids in the deadzone would be affected.
Yorkshire Water	No; we follow market codes & guidance so do not recalculate anything in the deadzone.  The exception to this is that we have an out-of-market settlement process for exceptional items, e.g surface water drainage.
Retailers	
ADSM-R	sometimes - low number, < 0.2%

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Business Stream	[REDACTED]
Castle Water	When a read is retired, we would recalculate costs to ensure customers have been billed accurately. A refund will be requested on the customers behalf where applicable. From the above answers to questions 2 and 3 we have estimated a refund of REDACTED across REDACTED SPIDs, that specifically relate to retired or changed meter reads. This is only for one quarterly re-run with one wholesaler.
Conservaqua	Yes. Currently 10-20 but I'd be reluctant to use this figure/ percentage of SPID base as the basis for future numbers. Improvements in data quality and the positive impact of CPW0152 may increase the relative number of cases and to reinforce the need for read data > 7 years old
Everflow	No comment
Pennon Water Services	N/A
Veolia Water Retail (UK) Limited	Not Answered
water2business limited	[REDACTED]
Waterplus	We do currently recalculate charges in the deadzone, and currently proactively refund customers in advance of receiving these refunds from the wholesaler. A simulation of the deletion of data prior to the 1st of July 2018 has been undertaken, and the potential impact to customer charges at various time points have been extracted to estimate the potential exposure created. These are as follows:  [See <a href="#">Table 1</a> in the document attached]

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Wave	We have experienced situations whereby claims and back-dated changes do span over the deadzone period, and we process them accordingly in line with new information and read data available. Whilst not frequent, there have been enough of these situations that it could be difficult to reach the best outcomes for customers if this was no longer possible
<b>Other</b>	
CCW	N/A

Question 5: Do you have other concerns regarding the deletion of meter read data older than seven years e.g. data usage, settlement, compliance?

Wholesalers	
Affinity Water Limited	Yes. Our main use for meter reads older than 7 years is to assist with volumetric adjustments. We use the entries in CMOS to view the historical daily average consumption. While this could still potentially be done with an I read and a recent C read, the missing reads would corrupt the consumption data for seasonal users and may also interfere with the periods where the meter had stopped or leaked.
Dwr Cymru	Yes data usage the loss of historical data
Northumbrian Water Ltd	Not Answered
Portsmouth Water	As mentioned in our answer to question 1, whilst we have no evidence, we are well aware of this behaviour. We just do not have capacity nor the systems to act upon it currently.
South East Water	The only concern being a query from the deadzone period re settlements.
South West Water	We believe customer history should be retained, especially if the goal is to encourage customer engagement in the market. Access to meter information is essential for supporting water efficiency initiatives. If MOSL and Trading Parties aim to promote this, then removing such data would undermine the ability to perform meaningful market analysis, as the necessary information would no longer be available.
Thames Water	For investigation purposes. Our internal systems do not hold the full read history and therefore, deleting reads that are older than 7 years might result in Thames Water losing the ability to access this data in the future. This

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	<p>does give us a cause for concern that this will have an impact on settlement and dealing with enquiries where potential gaps in periods could occur.</p>
United Utilities	<p>There is ongoing activity to cleanse market data, which may affect settlement periods extending beyond seven years. Given this, it would be prudent to acknowledge the current market position, the forthcoming decision on settlement code change CPW152, and MOSL's broader settlement strategy. Considering these factors, it may be appropriate to postpone or delay the deletion of historical data.</p> <p>If historical data is deleted, any future recalculations will reflect the data available in the market at the time of the rerun, rather than the data that was originally present and used for billing. This could lead to discrepancies between original and recalculated charges and disputes.</p> <p>Would consumption also be compressed/decompressed based on occupancy statuses which cross over the reads deleted? "Confirmed" usage in a vacant period in the market would then be recalculated and recharged to retailers even though the occupational history of the premises has been unchanged (if a Wholesaler does not charge for vacant consumption).</p> <p>Additionally, the rollout of smart metering will significantly increase the volume of data captured and stored. It is essential that any solution implemented now considers the need for substantially greater data storage capacity in the future.</p>
Wessex Water	<p>Yes. Whilst there is still consideration in whether the deadzone remains open to off-line refunds, we are not sure how much this impacts any potential outstanding queries until they arise.</p>
Yorkshire Water	<p>As referenced above, it is our view that the core issue is the management of meter reads; the root-cause problem we would determine from the published problem statement is that there are not enough actual reads being input over the last 7 years, which causes problems when older data is deleted. These are symptoms of a wider problem with the correct inputting of accurate meter read data and it feels unreasonable that there are so many SPIDs that have not had accurate reads for such an extended period of time.</p>
Retailers	

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ADSM-R	read history is intergral, own policy is to never delete read history for customers, as being able to review is very helpful.
Business Stream	<p>PLEASE TREAT THE SPID IN THIS ANSWER AS CONFIDENTIAL</p> <p>Yes. As outlined above, our main concern is the impact on Trading Parties’ ability to take corrective action related to poor market data at inception. The deletion of data older than seven years would undermine our ability to resolve long-standing issues.</p> <p>We have also undertaken a case study [REDACTED], which highlights the risks and unintended consequences of deleting meter reads older than seven years.</p> <p>Between April 2017 and October 2019, this meter was not physically read, and the G reads during this period were based on estimates. These estimated readings were consistently understated, resulting in lower consumption being recorded. A catch-up reading process later reconciled this under-recorded usage, with the actual consumption being correctly captured and settled between June 2018 and October 2019.</p> <p>However, if meter reads older than seven years (e.g., the I read from 2012) are deleted from the market, this artificially extends the consumption period, causing the system to redistribute total consumption over a longer timeframe. This results in inaccurate billing outputs that incorrectly imply that the customer was overcharged between June 2018 and October 2019.</p> <p>In this specific case, this error creates the perception of overcharges of approximately £900 per month, which could trigger unfounded claims against both Business Stream and Southern Water.</p> <p>This case study demonstrates the market-wide risk of historical read deletions. Even where SPIDs have been correctly settled and reconciled, such deletions can distort the consumption profile and raise unnecessary disputes between Retailers and Wholesalers and potentially third parties, potentially damaging customer trust and misrepresenting historical billing accuracy.</p>

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Castle Water	Yes, the above refund values illustrate how significant an issue historic meter read data can be and we need access to this to recalculate settlement costs and ensure customers are billed correctly. It also provides evidence if customer bills are disputed
Conservaqua	Yes. Consumption data is also the basis for delivering water efficiency and for water meter accuracy. Consumption trends are utilised for identifying worsening leakage, changes in benchmark assessments, strengthening cases for meter exchanges where meters are failing. Older read data also provides 3rd party organisations (e.g. ESG consultants or public sector bodies) to assist in measuring the delivery of consumption reduction programmes and resource demand planning. This would impact on the data requirements needed by interested parties identified in CPM060 & CPW156. Older meter reads would require archiving in a more economic fashion if it were not retained through CMOS. Our other concern is the removal of older meter reads, normally taken no more often than 1 month apart, is being used as a proxy as a solution for the future growth of Smart meter data, taken every 15 minutes/ 1 hour) if centralised within CMOS.
Everflow	
Pennon Water Services	Settlement charges are potentially still being reconciled after the seven year period, so in that respect we are not supportive of the deletion of data beyond seven years. Also, data provides a history of customer interaction that helps us build up a picture of the history of any given customer and gives us confidence in articulating a given position.
Veolia Water Retail (UK) Limited	Not Answered
water2business limited	[REDACTED]
Waterplus	The deletion of historic meter reads will prevent potentially subsidiary beneficial market activity, for example analysis in the area of Water Efficiency. Whilst the increased volume of data that Smart Metering programme will provide the market will provide much better visibility on current consumption, historic data can present significant value as a comparative to understand the efficacy of water efficiency measures.

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	<p>We recognise that whilst the retention of this data may provide value, this must be understood in the context of cost to retain. Based on the current projection of cost to retain the data identified by MOSL, we would not drive for this data to be retained for this purpose, however if an alternative approach at a lower cost level is available this would be worth consideration.</p>
Wave	<p>The main concern is the impact on settlement charges and the accurate recovery of post RF refunds for customers. We are also concerned that we would be unable to provide accurate information and associated bills and charges to our customers, which would be a reflection on the trust and accuracy of industry charges and consumption.</p>
<b>Other</b>	
CCW	<p>We agree that meter read data older than 7 years should be retained given the negative impact this could have on customers. From the analysis presented in the consultation paper, deleting this data could particularly affect those customers where limited, or no, actual reads have been recorded against their meter. We therefore do not want a change to be made that results in the accuracy of these customers' bills deteriorating even further, as well as the confusion and disruption that could be caused by erroneous refunds being made. Disputes regarding the accuracy of charges remain a key driver of complaints from business customers to CCW, so we do not want to see any market change that may exacerbate this issue.</p> <p>We also do not want to see customers struggling to obtain a historic refund as a result of this data having been removed. Such refund amounts are likely to be significant given the time period in question, so there could be a major impact on these customers if retailers no longer have the data to facilitate an calculation. This could lead to customers being unable to recover overpayments and result in protracted disputes with their retailer. It is therefore important this historic data remains visible.</p>

Question 6: Do you insert historic reads after removing G reads? Please explain.

Wholesalers

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Affinity Water Limited	As a Wholesaler we only insert W reads. We do not remove G reads unless asked to by a Retailer (and this is very rare)
Dwr Cymru	no
Northumbrian Water Ltd	Not answered
Portsmouth Water	We only remove G reads where we have a reading to replace the G read with.
South East Water	This is not something we would do, to ensure settlement consistency.
South West Water	Yes, we do insert a reading for this but on a case by case basis where there are mitigating or exceptional circumstances.
Thames Water	No comment
United Utilities	Rather than inserting new historic reads, we typically replace existing G reads with actual reads / final reads where better information is available. This allows us to recalculate consumption profiles more accurately, ensuring that settlement and charging reflect actual usage rather than estimates.
Wessex Water	N/A
Yorkshire Water	No comment
<b>Retailers</b>	
ADSM-R	Almost never - Only case I can think off was to insert an estimated T readings. If G reads were created, that was because there is no read history to be inserted. G reads are only deleted if a contemporary (current) reading has taken place - the only scenario I can think of where we would have a Cyclic reading to replace the G reading is if the cyclic reading could be estimated (not a good idea...)
Business Stream	Yes. Depending on the correction period, we insert historic reads after removing G reads. These changes are always agreed with the wholesaler to ensure accurate consumption across tariff years and correct calculation of customers' debits/credits.
Castle Water	We will retire G reads on LUR meters when an actual read comes in to ensure customers are billed on the correct annual tariff and to the correct customer, if the change in consumption is significant. If we can identify historic meter reads upon review and discussion with customers, these will be added to further ensure consumption use across tariff years is reflected as accurately as possible.
Conservaqua	Depends on the circumstances of the case.

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Everflow	No comment
Pennon Water Services	In relation to our processes PWS does not insert historic reads after removing G reads.
Veolia Water Retail (UK) Limited	Not Answered
water2business limited	[REDACTED]
Waterplus	<p>Our typical experience directly engaging with the G read deletion process to date has been following the introduction of a visual read that conflicts with the G-Read, and therefore a replacement is available, or on on the basis that the G-Read is distortive of other relevant reads already present in CMOS. As such, no replacement read would be required in previous instances.</p> <p>Prior to the proposed deletion process, the potential impact of G Read deletion has not been relevant as all consumption would remain accounted for.</p>
Wave	G reads are by definition due to the absence of reads at the RF cut off. In most instances there are therefore no historic reads to insert. There may be occasions where read data may be made available by the customer for example, but these are few in number. We do not routinely remove G reads however there are occasions where a recent read can highlight G reads have been grossly under or overestimated and the G read correction mechanism of adjusting volume in the period from G read to C read is not appropriate, causing volume to be allocated to incorrect tariff years.
<b>Other</b>	
CCW	N/A

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Question 7: What operational steps are you taking to obtain meter reads that can be used to replace G-reads? What proportion of G-reads have been replaced with customer-submitted or visual reads since market opening?

Wholesalers	
Affinity Water Limited	We only insert W reads. As these can only be adopted by the Retailer it is unknown how many have been used to replace G reads.
Dwr Cymru	No comment
Northumbrian Water Ltd	Not Answered
Portsmouth Water	As a wholesaler, we often have meter reads in our own systems, that may or may not, have been passed on to the retailer, therefore we often find an actual read around the same time as a G read.
South East Water	No comment
South West Water	<p>We are taking a targeted approach to resolving Long Unread Meters (LUMs) and Legacy Long Unread Meters (LLUMs). This includes close collaboration with retailers through engagement meetings and proactive reviews to reduce the number of unread meters and increase the success rate of meter reads by both our meter readers and retailers.</p> <p>In parallel, we are progressing with our Smart Meter (AMI) upgrade programme.</p> <p>Where we are the contracted meter reading provider, we share detailed insights with retailers on meters that cannot be read. This enables retailers to take targeted action—such as addressing access issues, arranging meter replacements, or requesting wholesaler visits to improve read success.</p>
Thames Water	No comment
United Utilities	A key area of focus is addressing long-unread meters by identifying and resolving issues related to meter location and access issues.

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	Looking forward, the ongoing rollout of smart metering is also expected to significantly reduce reliance on G reads by enabling more frequent and accurate data collection.
Wessex Water	N/A
Yorkshire Water	No comment
<b>Retailers</b>	
ADSM-R	No comment
Business Stream	We use any unsubmitted market reads, including visual, customer, AMR, and wholesaler reads, where available. All data undergoes internal validation to ensure accuracy.
Castle Water	We will frequently work with customers to obtain historic meter reads, which can be evidenced that was previously unavailable.
Conservaqua	Obtaining historic customer reads not previously made available to us or previous retailers, interpolation of historical A reads with current reads. Unable to answer the second question.
Everflow	No comment
Pennon Water Services	PWS do not look back at retrospective reads to replace G reads.
Veolia Water Retail (UK) Limited	Not Answered
water2business limited	[REDACTED]
Waterplus	[REDACTED]
Wave	We continue to strive to read meters at their stated market frequency and perform very well. We also continue to tackle LUMs where they exist. However, collection of historic reads to replace G reads is largely not possible so focus is on getting a current read to resolve the LUM.

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Other	
CCW	N/A

Question 8: How much will it cost you to re-insert historic reads to avoid customer bills being affected?

Wholesalers	
Affinity Water Limited	Unknown
Dwr Cymru	No comment
Northumbrian Water Ltd	Not Answered
Portsmouth Water	Unknown.
South East Water	
South West Water	This cannot be quantified separately, as it is embedded within standard business-as-usual activities.
Thames Water	No comment
United Utilities	N/A
Wessex Water	N/A
Yorkshire Water	No comment
Retailers	
ADSM-R	It's not a matter of cost, you cannot create a cyclic read from thin air.
Business Stream	We are unable to quantify this cost as it depends on a number of factors including the time taken to investigate the issue and resolve it, as well as the complexity of the issue.
Castle Water	Not calculated
Conservaqua	Depends on the individual case and the impact on corrective invoices. The cost is more than just an operational overhead.

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Everflow	No comment
Pennon Water Services	This is difficult to quantify.
Veolia Water Retail (UK) Limited	Not Answered
water2business limited	[REDACTED]
Waterplus	{REDACTED}
Wave	The cost of obtaining a read can vary depending on each situation. However, read gathering does represent a significant cost to most Retailers.
<b>Other</b>	
CCW	N/A

Question 9: Would the deletion of CMOS meter read data older than 7 years old affect your ability to respond to customer billing queries or refund claims? Please explain.

<b>Wholesalers</b>	
Affinity Water Limited	N/A
Dwr Cymru	No comment
Northumbrian Water Ltd	Not Answered
Portsmouth Water	Yes as the data we hold in our own systems is different to the read data within CMOS.

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South East Water	
South West Water	Yes, this could potentially affect our leak allowance process, as well as allowances for incorrect charges and other volumetric adjustments used to resolve complaints or support market processes.
Thames Water	It would if we do not hold the data in our systems. There will be the potential for gaps in meter read data, particularly around cyclical meter read data. This will therefore make it difficult between trading parties to agree positions and would be reliant on data held only in the trading party systems which they may not agree upon.
United Utilities	As previously noted, calculating consumption using different data sets can result in discrepancies between original and recalculated charges, potentially leading to disputes.  Assessments are made based on data held within the system. If the aged data is to be removed, then our current assessment processes will need to be revised to be based on settlement reporting and not current market data.
Wessex Water	Potentially, if the reads are not stored elsewhere. If MOSL remove the historic reads, it will be for the retailer and/or wholesaler to ensure they are available.
Yorkshire Water	No comment
<b>Retailers</b>	
ADSM-R	Possibly.
Business Stream	Yes. The deletion would severely impact our ability to investigate historic customer and wholesaler issues. Despite the five-year Prescription and Limitations limit on requesting payments, customers remain entitled to credits, and accurate resolution depends on access to historical data.  As a result of poor data in the market when it opened, we still have ongoing customer complaints going back to when the market opened. We are also still receiving customer and wholesaler queries going back to when the market opened. Removing this data would mean that we would not be able to fully investigate these issues and take the necessary corrective actions.
Castle Water	Yes, as previously noted we need all historic reads to support accurate customer billing. Historic reads are often used to support customer disputes and, in some cases, would be used to support cases that have gone through litigation.

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Conservaqua	Definitely. CMOS offers a rapid access of all meter reads that will otherwise either slow down this service (reads will have to be sought directly from wholesalers or customers archived invoices) or even prevent resolution for the customer if older reads cannot be sourced. This outcome would be deleterious to our relationship with the customer.
Everflow	
Pennon Water Services	Potentially in certain instances, data can help us in the resolution of issues in respect of older disputes. Data provides a consistent pattern of information in respect of the history of any particular interaction. Accurate historic data can help us support a given argument and position.
Veolia Water Retail (UK) Limited	Not Answered
water2business limited	[REDACTED]
Waterplus	Yes, the deletion of CMOS meter read data older than 7 years will affect our ability to respond to customer billing queries or refund claims where a new calculation of wholesale charges based on market data would lead to a different result.
Wave	Without a change to the methodology deletion of reads over 7 years will impact our ability to refund customers charges as we will not be able to accurately calculate post RF values to recover from the Wholesaler on some records. In turn, this affects our ability to provide accurate bills, costs and account balances to our customers for their water consumption. This would most likely result in complaints, costs and issues which would have no data to be able to be resolved.
<b>Other</b>	
CCW	N/A

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Question 10: If the deletion of CMOS meter read data older than 7 years old will affect your ability to respond to customer billing queries or refund claims, how much will that cost your organisation?

Wholesalers	
Affinity Water Limited	N/A
Dwr Cymru	No comment
Northumbrian Water Ltd	Not Answered
Portsmouth Water	Unknown.
South East Water	No comment
South West Water	We are currently unable to quantify this, as it will depend on the volume and value of individual cases—details that will only become clear once the matter is resolved.
Thames Water	There is the potential for disputes to be created between trading parties if they are not accessing the same and one source of data. If deletion does happen then we believe trading parties will need to agree that the position is to be taken as being the position as at the point of any deletion and that this must be accepted that no changes can be made. This does though have the potential to lead to an increase in escalations and disputes. This would need to be enshrined in the Codes and is a wider Code Change than being solely about data deletion.
United Utilities	<p>The deletion old reads could impact our ability to respond effectively to customer queries and refund claims. Until a new process was defined this would likely result in increased investigation times, higher cost to serve, and potential delays in processing customer requests.</p> <p>While it is difficult to quantify the exact financial impact, the operational burden and potential reputational risk associated with slower response times and unresolved disputes should not be noted.</p>
Wessex Water	Unfortunately, we are unable to quantify the cost to the organisation, as we do not fully know the extent of overcharging.
Yorkshire Water	No comment
Retailers	

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ADSM-R	unknown quantity
Business Stream	Please see our response to question 4.4  It is not possible to accurately project the cost to the organisation but this would be significant.
Castle Water	Given the value of our current quarterly re-runs we would estimate this to be easily seven figures.
Conservaqua	The intangible cost of a worse relationship. Financially this will impact on our related value added services revenue.
Everflow	No comment
Pennon Water Services	This is difficult to currently quantify.
Veolia Water Retail (UK) Limited	Not Answered
water2business limited	[REDACTED]
Waterplus	As highlighted in our projections above, the deletion will create several million pound of potential exposure to reduced customer charges. This could prevent Water Plus from being able to maintain a proactive refund approach to customers, and instead only refund customers once these refunds have been received from the Wholesaler.  In addition, we would highlight the risk that should customer representative third parties be provided increased access to market consumption (i.e. CPW156) any potential divergence between historically billed volumes and values currently retained in CMOS will be visible to these entities. Whilst billing may have been accurate, and the

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	total consumption charged appropriately, the deletion of this data may suggest that billing within this time period was incorrect and these entities will have opportunity to challenge.
Wave	This cannot be quantified at this stage.
<b>Other</b>	
CCW	N/A

Question 11: If historic readings older than 7 years are deleted as per CSD 0400 section 7.5.1 , would your organisation need additional time or support to prepare for this change? If so, how much time and what kind of support?

<b>Wholesalers</b>	
Affinity Water Limited	Our IT team has been downloading all MDS meter read files since 2017, but as these files become out of date once a read is retired, we do not have an accurate meter reading history stored. If meter read data older than 7 years is to be deleted, a file should be provided to each TP showing the removed reads. As it would be impossible to retire a deleted read, this file would always be accurate. Our IT teams could then use this file where they feel it is necessary.
Dwr Cymru	No comment
Northumbrian Water Ltd	Not Answered
Portsmouth Water	We would require an extract from CMOS at SPID and meter level showing the reads.
South East Water	Further time to capture any potential risks, via data collection evidence on specific SPIDS would be useful. We believe 3 to 6 months would be reasonable.
South West Water	Yes, all G reads must be cleared before any further progress can be made. We estimate this process could take approximately nine months, as it will require a comprehensive data cleanse. Additionally, enhanced reporting functionality within CMOS will be necessary to support this activity.

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Thames Water	We would be reliant on an efficient mechanism for ‘final’ datashare from MOSL prior to deletion and at this point have not scoped any way to receive or store this data. Our assumption is that a period of several months would be needed before moving data from ‘final’ to deleted.
United Utilities	Fundamentally we are against the removal of reads, and defining process to cater for historical data being unavailable should not be underestimated. Any solution would have to consider the identification of deleted reads which would result in settlement recalculation. IT and reporting changes will be needed which can be restricted by release cycles. Putting a specific timeframe on this is currently difficult.
Wessex Water	We have all the meter reads stored in our own databases. However, could MOSL archive to FTP like they do with settlement data
Yorkshire Water	<p>We would be concerned about a potential increase in Post-RF refund requests from retailers that would raise significant costs for us. This also highlights our concerns about the accuracy of meter read data in the market.</p> <p>It would be useful for us to understand the exact process for deleting this data and how that would interact with our systems – whether messages would be raised or additional work would be needed. Giving trading parties the option to receive/suppress CMOS messaging through this would be ideal. We wouldn’t be able to give an accurate estimation of timescales until some of these unknowns were clarified.</p>
<b>Retailers</b>	
ADSM-R	No comment
Business Stream	Yes. We would require time and support to download the affected reads into our systems.
Castle Water	All market participants would need to invest in creating their own database to store historic reads. This runs the risk of the market losing one source of truth, which could create disputes around data accuracy and validity. Investments would be significant and timescales are currently unknown.
Conservaqua	There would need to be an annual provision by MOSL of the data to be deleted for us to retain by ourselves. New entrants will also need to be provided with the option to source all deleted read data to be on a level playing field with other retailers. Therefore an out of CMOS data archive will be required. Size and costs of the archive will need to be quantified and whether 100% of smart meter data should be included.
Everflow	No comment

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Pennon Water Services	Yes, potentially PWS would need additional time to prepare for the deletion of data. There would be a potential systems and staff resource issue to consider, but this is difficult to quantify at this stage.
Veolia Water Retail (UK) Limited	Not Answered
water2business limited	[REDACTED]
Waterplus	The proposed deletion of historic meter reads without mitigation will create a significant additional on-going exposure, that would be replicated at each additional data deletion cycle. The underling exposure of potential changes to charging would not be fully possible to address regardless of time period.
Wave	A market solution is required as this will impact all trading party pairings so an individual solution for our business in isolation is not sufficient.
<b>Other</b>	
CCW	N/A

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Question 12: Which of the following options is your preferred solution as Section 1.8? Why? i) Pre-deletion copy and targeted removal ii) Seven years plus one read retention iii) Synthetic “lock-in” read at deletion point iv) MOSL delays the deletion of the data by 6 months, to allow trading parties to insert/ rectify historical reads to ‘lock in’ the gradient for volume estimation v) Paying the cost to retain data in CMOS (as in section 1.8.2) on a permanent basis (with the risk of CMOS running slower etc) vi) Removing the historic meter reads when they are older than 7 years (as per CSD 0400 section 7.5.1)

Wholesalers	
Affinity Water Limited	Options 1 to 3 seem overly complicated. Option 4 seems unnecessary as it is likely to impact a low number of meters (for us). Also, this mainly concerns LUMs, and if a read has not been taken for 7 years, an extra 6 months is unlikely to make a difference. This leaves options 5 & 6, of which we cannot decide on as there are arguments for both.
Dwr Cymru	No comment
Northumbrian Water Ltd	Not Answered
Portsmouth Water	iii
South East Water	No particular preference, as long as the integrity of the settlements is maintained. The SPID example used in CPW157 is more likely to be an abnormal case where minimal reads are taken over several years. If Retailers are regularly reading the meters correctly, there is unlikely to be significant issues dating back beyond 7 years. Therefore, a synthetic lock in would sound sensible. We certainly do not wish to be paying any more costs or charges relating to option v).
South West Water	Option V) is our preferred solution. Please see our responses to Questions 5 and 9 which support our decision.
Thames Water	Our preference is for a variant of option v) but with potential improvements to speed and performance, or some form of archiving that is centrally funded through the MOSL Business Plan.
United Utilities	Option v) would be our preference in the short/medium term.
Wessex Water	At this stage, our preferred option is either 6, but only with a review of the market codes to ascertain the responsibilities of other parties of retaining meter data after 7 years.

Yorkshire Water	<p>We would need more detailed analysis on the consequences of some of these options. In our view, Option 2 is the most viable from what we know, but we would need much more analysis of how this would work to make a fully informed recommendation.</p> <p>Option 1 does not give us enough information to understand what it would mean and how impactful that would be. For example, are there long-term risks of that database becoming too large? At what point would this reach a state where it is no longer viable and we come across the same problem again?</p> <p>We feel that options 4, 5, and 6 are less viable based on what has been stated.</p>
<b>Retailers</b>	
ADSM-R	<ul style="list-style-type: none"> <li>* Viable options:</li> <li>* Paying the cost to retain data in CMOS on a permanent basis</li> <li>* Seven years plus one (or plus 2) read retention</li> <li>* Synthetic “lock-in” read at deletion point? [Not sure about]</li> </ul> <p>Preferred among these: probably the order as above</p>
Business Stream	<p>Our preferred solution is: (v) Paying the cost to retain data in CMOS on a permanent basis. This mirrors the approach taken in Scotland and ensures long-term data integrity. While it may involve cost, a full cost-benefit analysis should be undertaken to determine feasibility. We recommend MOSL engage with the Scottish CMA to understand associated costs and benefits.</p> <p>If this proves nonviable, our second preference is: (i) Pre-deletion copy and targeted removal. If this route is chosen, Trading Parties will need time to assess the impact of downloading any affected reads and adjusting processes. MOSL should also clarify how data access would be facilitated and timelines for retrieval before implementing this option.</p>
Castle Water	<p>Our preferred solution is: v) Paying the cost to retain data in CMOS (as in section 1.8.2) on a permanent basis (with the risk of CMOS running slower etc). The costs to retain this data is insignificant if all trading parties contributed, in comparison to the settlement cost impact as well as the increasing costs involved</p>

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	in serving customers, debt collection and dealing with customer disputes. Any other solution has the potential to detrimentally impact these processes and will likely incur significant development costs. Before any other solution is implemented a review of development cost vs current storage costs would be needed.
Conservaqua	None of these solutions are acceptable to us.
Everflow	No comment
Pennon Water Services	PWS would wish to know what the costs and operational issues would be for retaining the data in CMOS. However, in principle retaining the data within CMOS would be our preferred solution. This could be in a revised "slimmed down" data format.
Veolia Water Retail (UK) Limited	Not Answered
water2business limited	[REDACTED]
Waterplus	<p>We believe it is critical that the solution ensures the trajectory of consumption remains accurate for the full 7 year period, and does not create an undue burden on trading parties to resolve this issue. As such, we believe that options iv and vi should be discounted.</p> <p>Our preferences between the other suggested solutions will be largely dependent on the cost efficacy of undertaking these solutions, with option v representing the most effective solution for ensuring accuracy and subsidiary benefit (though likely incurring the highest level of cost). On the assumption that options i, ii and iii are possible at a reduced cost comparatively we believe that the Seven Years plus one approach represents the most effective approach to mitigation.</p>
Wave	<ul style="list-style-type: none"> <li>a. Pre-deletion copy and targeted removal</li> <li>b. Seven years plus one read retention</li> <li>c. Synthetic "lock-in" read at deletion point</li> </ul>

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	<p>d. MOSL delays the deletion of the data by 6 months, to allow trading parties to insert/ rectify historical reads to 'lock in' the gradient for volume estimation</p> <p>e. Paying the cost to retain data in CMOS (as in section 1.8.2) on a permanent basis (with the risk of CMOS running slower etc)</p> <p>We believe with the current quality of read data in the market that this is the most viable option at this moment in time, but acknowledge the quality is improving. We have instances whereby access to read data beyond 7 years allows us to correctly identify accurate consumption patterns on historic or pre-market meters. We accept that there will need to be a cut-off at some point in the future and propose option B as the next best option.</p> <p>f. Removing the historic meter reads when they are older than 7 years (as per CSD 0400 section 7.5.1)</p>
<b>Other</b>	
CCW	<p>We agree that meter reads older than 7 years should be retained, so we do not support the removal of these reads as outlined under option 6. We also do not believe options 4 or 5 are viable either. To ensure this issue is resolved in the most efficient and timely way possible, it needs to be a centralised solution overseen by MOSL rather than one reliant on trading parties rectifying the data on an individual basis. However, it would also be undesirable for the data to be retained in CMOS on a permanent basis given the impact this could have on the system's operational efficiency. It is vital that MOSL's core functions are not compromised given the wider negative impact this could have on the market, and customers.</p> <p>Given our preference for a centralised solution, we would support options 1 – 3 being explored further. However, at this stage, without knowing the full practicalities of each one, we are unable to express a preference until each option is explored in more depth, and further details are provided.</p>

Question 13: Do you have any other solution in mind to suggest?

**Wholesalers**

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Affinity Water Limited	As mentioned, if reads are to be deleted, a file should be provided to each TP showing the removed reads.
Dwr Cymru	No comment
Northumbrian Water Ltd	Not Answered
Portsmouth Water	No
South East Water	No
South West Water	No
Thames Water	MOSL to offer an archiving system rather than keep on the production system and risking for it to be slow.
United Utilities	Data that continues to impact charge calculation periods within the most recent seven years should be identified and retained. Only data that no longer influences these periods should be considered for deletion, including reads. This could be achieved through an overlay analysis using effective from/to dates in conjunction with transaction submission dates, ensuring that only data with no ongoing relevance to settlement is removed.
Wessex Water	Are there any non-chargeable data items that can be removed instead
Yorkshire Water	We would ask about the viability of combining options 1 and 2; MOSL could keep a backup database but have CMOS use a retained data item for longer than the current 7-year period.  A wider market solution would be to look into fixing the number of meter reads not being input into CMOS, however we acknowledge this is a historic issue that does not necessarily fix the current problem.
<b>Retailers</b>	
ADSM-R	storing "archival" record of meter reads (just reads, no transactional data) to minimise storage cost for reads past 7 years?
Business Stream	Yes. We propose MOSL collaborate with the Scottish CMA to examine their approach to managing historical data, given their market has operated since 2008 with continued data access.
Castle Water	The only other solution that is possibly manageable is i) Pre-deletion copy and targeted removal, but this would need further work to determine implementation costs and our view is that it runs a higher risk as targeting specific reads is likely to result in the wrong reads being deleted and difficult to recover.

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Conservaqua	Archive data base outside of CMOS
Everflow	No comment
Pennon Water Services	Not at this point of time.
Veolia Water Retail (UK) Limited	Not Answered
water2business limited	[REDACTED]
Waterplus	We do not have any additional suggestions at this stage, but would welcome consideration of any other sensible approaches raised.
Wave	Following the 9-year rule falls (provided under S14A), which provides the customer an ability to claim back to that period and would provide data for the retailer to be able to handle their account and claims.
<b>Other</b>	
CCW	N/A

Question 14: Do you have any further comments?

<b>Wholesalers</b>	
Affinity Water Limited	No
Dwr Cymru	No comment
Northumbrian Water Ltd	Not answered

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Portsmouth Water	No
South East Water	No
South West Water	No
Thames Water	It would be worth MOSL considering the impact on Legacy Long Unread Meters or Long Term Vacant positions.
United Utilities	<p>Has MOSL modelled the impact of the proposed changes from a central perspective? Supported evidence on the materiality would help demonstrate if this is the correct decision for the Water industry in its current position.</p> <p>Once Smart metering is fully rolled out the sensitivity of the meter read deletions would be removed.</p> <p>We do not agree with the data deletion due to the current market position and forthcoming activity associated with settlement changes and strategy review.</p>
Wessex Water	<p>There needs be a review whether it's appropriate to adjust settlement after 7 years. Currently, there is no facility with MOSL to re-run settlement files in the deadzone, which is being discussed in CPW152.</p> <p>If MOSL pursues with option 6, this creates an obligation to the retailer and wholesaler to store data beyond 7 years. There needs to clarity in the market codes, otherwise there will be an inconsistent approach across the industry.</p>
Yorkshire Water	<p>We feel it would be important to flag a potential future issue with average cyclic read trends in 27/28 with Covid year data (2020) – it is highly likely that the skewed averages from that year will affect the calculation of consumption estimates over a 7-year period.</p> <p>Where does the current proposal for CPW157 fit into the overall Settlement Strategy being worked on? This also raises a question as to whether a much greater issue is the long-term viability of CMOS and whether this needs a high-level review/rebuild as the market continues to grow.</p> <p>In theory, we believe that smart meters will provide at least monthly reads for retailers to add to CMOS and a lot of this will go away. We recognise that this is a long way off and there are other challenges, such as getting meters exchanged, but once they are in the ground then putting reads into CMOS will become much more timely and the issue raised in the problem statement should become less pronounced.</p>

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Retailers	
ADSM-R	No comment
Business Stream	Yes. Deleting data older than seven years risks permanently undermining our ability to resolve legacy issues and maintain data integrity. Given the ongoing relevance of historical records, data beyond seven years should be retained.
Castle Water	<p>The main concern for implementing historic meter read removal looks to be cost of storage. All solutions need to consider the impact on customers and the ability to raise accurate billing which reflects actual consumption. As noted above the historic meter reads support large re-runs and refund for customers, without these historical reads this process will be jeopardised. Deletion of historical meter reads would also make debt collection more difficult as we would struggle to demonstrate the meter read history from which invoices are raised.</p> <p>For the alternative solutions proposed it is very difficult to take a view on whether they would be better than paying to keep all meter reads without further work to determine implementation costs and timescales.</p> <p>Without a view on the cost of implementing alternative solutions it is very difficult to make a decision.</p>
Conservaqua	no
Everflow	<p>While we do not have a large enough amount of experience with the issues highlighted to comment saliently, we would like to express views on a few areas. We are concerned that, once meter read data older than seven years is deleted, the ability to analyse historical consumption and identify long-term trends will be significantly reduced. We note that this could be particularly significant in the context of sustainability initiatives, where monitoring changes in water consumption over extended periods is essential for evaluating progress and identifying areas for improvement.</p> <p>With regard to the proposed solutions, we believe further internal discussion is required, alongside more detailed information to be provided, to fully assess which solution would be most appropriate for the problem stated. That said, we would be interested in option 3, the creation of a synthetic “lock-in” read at deletion point, that could act as an anchor to future read calculations. We believe this approach offers a logical and pragmatic</p>

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	<p>method for addressing the issue, as it provides a clear and consistent data point from which subsequent consumption can be accurately derived. We would also highlight that any potential increase in MO charges could have a material impact and would be of concern.</p> <p>We would welcome future consultation on this matter once the market has had the opportunity to comment, and details have been refined as to what the next steps may look like.</p>
Pennon Water Services	None.
Veolia Water Retail (UK) Limited	Not Answered
water2business limited	[REDACTED]
Waterplus	<p>Working with our third party supplier, we have provided two further case studies below which we believe help identify the issue presented:</p> <p>[See <a href="#">Case Study</a> attachment in the <a href="#">Appendix</a> ]</p>
Wave	There has been a sense that this has been perceived to be an issue that is limited to one Retailer however with the advent of CPW152 the 7-year data deletion policy will be more widely felt. We support the need to reduce data storage costs however it is crucial that confidence is maintained in the accuracy of settlement calculations and by association, customer billing and charges.
<b>Other</b>	
CCW	As well as a centralised solution to ensure meter read data older than 7 years is retained, it is also important that trading parties use the existing market process to insert retrospective meter reads where possible. It is concerning that a large number of system generated reads are being removed but are not being replaced with

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	actual reads. We want to see the market codes strengthened to ensure that reads are being replaced as they should so settlement, and ultimately billing, accuracy does not deteriorate.
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## APPENDIX

[REDACTED]