

# Market Focus

News from the  
heart of the market



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

# Welcome to the February edition of Market Focus

## 03 **Upfront**

A message from Lyvia Nabarro, Head of Market Engagement and Communications  
Dates for your diary

## 04 **New and Notable**

MOSL publishes 2025–28 Business Plan for member voting  
Committee vacancies  
MOSL publishes latest quarterly report  
MOSL publishes Q3 Sustainability Report  
MIF Bumper Edition:  
Round four now open to applications  
Addressing Trading Party Survey feedback  
Project REDUCED produces final report on water efficiency  
technology portal  
Trading Party Audit updates  
Deregistration guidance  
BR–MeX updates  
Market Systems Resilience workshop  
Independent Commission Call for Evidence

## 16 **Improvement Programmes**

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

## 20 **Industry Speaks**

RWG Corner  
Strategic Panel update

## 22 **In Every Issue**

Change updates  
Monthly market statistic  
CMOS transactions  
Behind the Mailbox – Angela Day  
MOSL on the Move



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

## A message from Lyvia Nabarro, Head of Market Engagement and Communications

Welcome to February's edition of Market Focus!

It's probably becoming a bit worn now to say that it's another busy month at MOSL, but it is true that there is still lots happening across the market in the run up until 1 April 2025.

For my team and I, this last quarter marks the start of the end of year reporting period as well as the delivery of our final quarter improvement programme milestones.

Our [2025-28 Business Plan](#) is currently with trading parties to vote on. Having worked with a great team on our business planning for the last five years, I feel this is our most confident to date. By confident, I mean not only that we are clear on our commitments for the year ahead, but that we know how these deliverables will support us in future years. 2025/26 marks a lot of "bedding in" for big programmes of work. The new Market Performance Framework will give us strong foundations to better incentivise performance and deliver for customers. The



Business Customer and Retailer Measure of Experience (BR-MeX) will see the first performance commitment solely focused on improving the service provided to businesses. The Data Assurance Service, looks to maintain a relentless focus on data quality and hold parties to account for it through a new MPF metric.

These milestones are a result of the market's collective ambition to improve the way in which the market operates. While this will naturally lead to improvements in customers' experience, we shouldn't shy away from the fact that it will also make operating in the market more efficient for wholesalers and retailers. For the market to work, it needs to work for trading parties as well as customers otherwise there is no competition. Without competition there is no customer

### Dates for your diary

13-27 Feb: [Business Plan voting](#)

19 Feb: [User Forum](#)

24 Feb: [Data Assurance Service webinar](#)

27 Feb: [MOSL General Meeting](#)

27 Feb: [BR-MeX webinar](#)

17-28 Feb: [Market Improvement Fund application window](#)

choice. You can find out more about how we are looking to improve the market through our business plan activities and drive efficiency on [page 4](#). Don't forget to vote by 2pm on 27 February!

More broadly, the industry itself will be facing transformation via recommendations to central Government. The Independent Commission's Call for Evidence will launch on 27 February (easy way to remember our business plan deadline!) MOSL will be submitting a response on behalf of its Board. Find out more on [page 15](#).

Of course, there is lots more to catch up on. Enjoy reading and if you have any feedback on Market Focus, email [comms@mosl.co.uk](mailto:comms@mosl.co.uk).

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

## MOSL publishes 2025-28 Business Plan for member voting

On 12 February MOSL published its 2025-28 Business Plan for member voting.



Its publication follows consultation with trading parties on the draft plan. We would like to thank all parties who responded to the consultation. In total, we received 24 responses – 13 wholesalers/NAVs, 10 retailers and CCW. Overall, the majority of respondents (91%) were supportive of the level of Market Operator (MO) charges and focus areas of our plan.

We also consulted specifically on the inclusion of a new Strategic Data Programme to tackle the root causes of poor data entering the market. 67% of respondents were supportive of the programme, with a further three (12%) 'supportive in principle' but wanting more detail on the scope and desired outcomes.

Noting the overall support for the Strategic Data Programme we have incorporated it into our business plan and budget. This change is the most notable change in the final plan and adds 2% to our proposed MO charges, which will now increase by 1% compared to 2024/25 (previously a 1% reduction in our draft plan).

**Our total spend budget for 2025/26 is £14,045k.** £13,700k will be funded through MO charges with £345k funded from reserves.

Further information on the changes we've made can be found on the News page of our website and on pages 38-39 of the business plan.

Contract Managers and nominated contacts will have received Notice of the General Meeting being held at 3pm on 27 February and a copy of the online voting form, which was sent by our independent service provider, Mi Voice. Voting runs until 2pm on 27 February (an hour before the General Meeting).

We ask that all trading parties ensure they have updated MOSL of any changes to Contract Manager or nominated contacts and that they have received a copy of the Notice and voting form.

Should you have any questions on the plan or voting process, please email [comms@mosl.co.uk](mailto:comms@mosl.co.uk).

## MOSL General Meeting

MOSL will hold a General Meeting via Microsoft Teams on Thursday 27 February 2025 at 3pm.

On 12 February we issued [Notice of the Meeting](#) by email (also available on the [MOSL website](#)). Eligible members should have also received an email with details on how to vote using the electronic voting platform.

At the meeting, one special resolution will be put to MOSL's members for approval. The supporting commentary and the meeting details are provided in the Notice. The resolution is for approval of MOSL's 2025–2026 annual budget of expenditure (set out on page 4).

We encourage all eligible members to vote electronically on the resolution before the meeting.

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

## Committee Vacancies

We are looking for members for three industry committees.

### Code Change Committee

The Code Change Committee is looking to appoint a new wholesaler trading party member. Nominations opened on Tuesday 4 February. The Code Change Committee would like to thank outgoing member Mike Rathbone for his valuable contribution to the Committee since its inception in March 2022, and wish him all the best in his future ventures.

### Disputes Committee

The Disputes Committee (DC) is currently recruiting for four retailer members. The DC is responsible for determining the outcomes of Trading, Non-Trading, Market Operator, and Market Arrangements Code (MAC) Disputes, and recommends changes to the market codes to improve disputes procedures. The Committee holds two scheduled meetings per year and otherwise meets as required to hear Disputes.

Those wishing to apply for the Code Change or Disputes Committee roles should complete an [online nomination form](#), which can also be found on the [MOSL website](#), and send a copy of their CV to [people@mosl.co.uk](mailto:people@mosl.co.uk). Previous experience on industry committees is not required and we are looking for diverse candidates with a broad range of skills and backgrounds.

### Digital and Data Committee

MOSL's Digital and Data Committee is looking to appoint two new Co-Opted Committee members. A wholesaler/retailer Co-Opted member should have strategic level water industry expertise to provide advice and insight to MOSL's digital and data strategy.

If you have experience of decision-making at a senior level in a digital/data/technology function, and knowledge of the business water market, we would be delighted to hear from you. To find out more about the role and how to apply, please visit the [MOSL website](#).

You can find the latest committee and industry group vacancies on the MOSL website. MOSL committee vacancies are available via the [Board and Board Committee vacancies page](#).

## MOSL publishes latest quarterly report

MOSL has published its Quarter 3 (Q3) Report for its key performance indicators (KPIs) and improvement programmes for 2024/25.



The report shows all 21 KPIs are performing at or above target for the first time since we began reporting our quarterly progress on these measures in 2022/23. We are also running at 68% delivery of our improvement programme milestones for the year.

Key deliverables this quarter include:

- **Bilateral Transactions Programme:** We released Phase 14 deliverables into the live environment. Code documentation for Phase 15 was released early to trading parties in December – originally scheduled for Quarter 4.
- **Modernisation of Market Systems:** MOSL achieved the Cyber Essentials certification, a government-backed scheme which helps to keep organisational and customer data safe from cyber attacks – originally scheduled to be delivered in Quarter 4.
- **Market Performance Framework (MPF) Review:** Both the metrics and requirements for Phase 1 were reviewed by the Performance Advisory Group (PAG), and Part B (non-financial tools) was implemented.

Similar to Q2, at the end of this quarter there are varying completion percentages for MOSL's improvement programmes. The Bilateral Transactions Programme shows 90% complete, whilst Strategic Metering Review is tracking at 45%. This is due to the weighting of milestones across each quarter.

We have simplified our approach for this quarter's report taking account of feedback from trading parties. This includes reducing the detail of KPI delivery and removing the next quarter's programme milestones. We have also converted the report to a more accessible PDF document. If you have any feedback on the report, please email [comms@mosl.co.uk](mailto:comms@mosl.co.uk).

All of our quarterly updates can be found on our [Quarterly Reports webpage](#).

## MOSL publishes Q3 Sustainability Report

MOSL has published its Sustainability Quarterly Report for the third quarter of 2024/25. The report features an overview of performance against each of the four key areas and progress against the 12 commitments in our 2024/25 Sustainability Plan.



This quarter, 12 commitments are performing at or just above target. Eight commitments have performed significantly above target and we are on track to deliver all of our commitments for the year.

Highlights for the quarter include:

- **EDI:** MOSL organised and led an Institute of Water EDI Conference in London in November 2024. The event focused on creating and maintaining cultures of inclusion and how companies can enable their workforce to bring their authentic selves to work every day.
- **Digital accessibility:** We have produced and tested the first batch of accessibility improvements to the MOSL website and implemented accessibility improvements to our document templates.
- **Climate Change:** The Board and SLT approved the inclusion of an environmental clause in all new contracts over the value of £20,000.
- **Charity and Volunteering:** MOSL organised a Christmas party for our charity partners, No Limits. Colleagues and partners donated time and money to provide a memorable event for service users.

- **Education:** Three colleagues started their apprenticeship courses, and all colleagues were trained in the new sexual harassment policy following the new legal duty for employers to proactively take reasonable steps to prevent sexual harassment.

### Two-year cycle

We have made the decision to change our sustainability planning and reporting from a one year to a two-year cycle. This will give us longer to build partnerships, provide more opportunities for colleagues and ensure we manage the resource requirements across the business. We will continue to produce a quarterly report, but the 2024/25 Sustainability Report will be a summary of progress made to date and planned activities for 2025/26. The next Sustainability Plan will be published in spring 2026.

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

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



We are pleased to announce that the Market Improvement Fund is now accepting applications for round four.

## **MIF Bumper Edition: Round Four now accepting applications**

Applicants have until 28 February to apply for up to £200k of funding for projects that aim to improve the business water market.

This round introduces a notable addition: the Booster Fund. Successful round four applicants who demonstrate significant success from their projects may unlock an additional 50% of their initial funding to further develop their work. More information on how to apply for the Booster Fund will be made available later this year, but trading parties are able to state in their application whether they would be interested in applying for additional funding.

We encourage all applicants to consider the resources required to run and promote their projects, as well as the project objectives. As administrators on the fund on behalf of the Strategic Panel, MOSL can support in reporting project outputs, however we do not provide project management or marketing support.

Applications must be submitted to [MIF@mosl.co.uk](mailto:MIF@mosl.co.uk) by 12pm on Friday 28 February. If you have any questions, please contact the MIF team.

You can find out more information and view projects from previous rounds on the MIF section of the MOSL website.







The Market Improvement Fund (MIF) would like to everyone who provided feedback on the fund through the Annual Trading Party Survey. We have categorised responses into five areas:

*1. Strategic Alignment: Ensure projects are tightly linked to the Strategic Panel's priorities and review the inclusion criteria for BAU projects aimed at market improvement.*

As the Strategic Panel owns the MIF, projects should align to its priorities. MOSL updated the [Application Handbook](#) to emphasise that while all value-adding projects are welcome, those aligning with the Panel's Roadmap to a Flourishing Market are particularly encouraged. The [Application Form and Completion Guidebook](#) have been amended to clearly articulate this. MIF funding does not cover BAU projects (see MAC section 9.6), so we have clarified that BAU includes mandatory market activities, recurring tasks, and MOSL's business plan workstreams.

## MIF Bumper Edition: Addressing Trading Party Survey feedback

*2. Enhanced Transparency: Provide clearer project descriptions, success metrics, and post-project evaluations to build trust in fund governance.*

MOSL prepares regular reports for the Strategic Panel on MIF progress and post-project evaluations. Public versions of these updates and post-project evaluations will be made available on the MOSL website

*3. Diversified Focus: Shift focus from water efficiency to broader market operational improvements to foster a thriving market.*

The MIF is open to all projects that can drive improvements in the market. While past projects prioritised water efficiency initiatives, the fund has also supported projects in areas such as data cleansing, meter location, and developer interface solutions. The [Roadmap to a Flourishing Market](#) broadens this scope further to encourage a greater variety of projects.

*4. Governance Review: Address potential conflicts of interest and improve the transparency of governance structures.*

Members of the MIF Selection Committee receive conflict-of-interest training and recuse themselves when necessary. MOSL does not have a vote on projects and is required to follow the same criteria when sponsoring a project. As an example, in round three, MOSL was awarded funding for Project CATRID. Whilst the project underwent the same process, we have also produced a Memorandum of Understanding (MOU) which outlines MOSL's commitment to upholding the rules of the MIF and ensuring the funding is used appropriately.

For round four, the MIF Selection Committee composition has been reviewed by the Strategic Panel. The committee now includes four Strategic Panel members: A retailer member, wholesaler member, a customer representative and an independent member.

Members will be listed on the MOSL website, with additional independent members recruited as needed.

**Continue on next page >>**

## Addressing Trading Party Survey feedback (cont.)

*5. Streamlined Processes: Simplify application and approval processes to reduce delays and administrative burdens.*

MOSL has engaged a third-party legal team to assist with documentation, though delays due to delivery partners remain beyond our control. Project approval times vary, so applicants should plan accordingly. Updated process documents are available on the MIF page.

We appreciate the feedback and welcome further inquiries at [MIF@mosl.co.uk](mailto:MIF@mosl.co.uk).

## MIF Bumper Edition: Project REDUCED produces final report on water efficiency technology portal

**Project REDUCED (Raising Efforts to Drive User Consumption Efficaciously Down) has concluded its Market Improvement Fund project, creating an online catalogue of water efficiency technology offerings for wholesalers, retailers and technology companies.**

The portal was created to better support customers' water efficiency efforts by providing independently assessed information on water efficiency technologies, enabling retailers to compare options on behalf of their customers. The portal introduced 93 retrofit and 37 industrial technologies from multiple countries. The portal

also offered a number of trial opportunities, giving retailers the opportunity to test and better understand certain technologies.

The [comprehensive report](#) and [accompanying article](#) provide further details on project learnings and insights, along with quotes from suppliers that were featured on the portal.

According to the report, the project faced challenges particularly around engagement from retailers. Reasons included limited support for investments in water efficiency technologies and retailers' focus on pricing and billing services. However, the project demonstrated

the breadth of opportunities available and the potential benefits of increased visibility and direct comparison. It also demonstrated how a centralised portal could make water efficiency offerings easier to access by retailers.

MOSL has published a [list of technologies and trial opportunities](#) that were available on the portal as of December 2024 – please note you will need to log in to view this content.

## Deregistration guidance

In October 2024, MOSL issued new guidance to support the deregistration process to align trading parties' processes to the market codes.

We recognise that this guidance conflicted with guidance issued in 2023 specific to the Eligibility Assurance Process, in particular, guidance around the SPERRing of supply points (SPIDs).

A number of trading parties expressed concerns with the SPERRing of SPIDs as unlike deregistration, this action cannot be undone. Retailers, particularly, were worried about the potential impact on billing if customer details and historic billing records were deleted.

We would like to apologise to all trading parties for any confusion this conflicting guidance caused and our inefficiency in resolving the issue more quickly. We have undertaken an internal lessons learned exercise to ensure we put in place processes to prevent this happening again.

Having spoken to a number of parties regarding their concerns, on 6 February we issued a communication to trading parties of our decision to retain the [Eligibility Guidance](#) published in November 2023 as the recommended guidance for parties to follow. This guidance document is now available again on the MOSL website.

We recognise that this will not support trading parties in being code compliant but believe it is in the best interest of business customers. We will explore a potential code change to ensure the provisions relating to SPERRing and deregistration support effective data retention in the interests of the market and customers.

If you have any concerns regarding the guidance document, please raise a query via My MOSL.

## BR-MeX update



**MOSL has been working closely with Ofwat colleagues to support the communication and define the metric and reporting for the Business Customer element of the BR-MeX.**

Ofwat led a workshop in January and will be holding a further online workshop on 27 February at 10am. The focus of this session, which will be supported by MOSL, will be the revised questionnaire for R-MeX, assurance processes and guidance on scoring consistency. Ofwat will also be sharing B-MeX-draft guidance. Further information can be found on the Ofwat website.

MOSL will leading a webinar in March (currently proposed for 24 March – invitations to follow) to introduce the B-MeX survey provider, following this month's tender process.

We are pleased to confirm the appointment of Accent as the survey provider from April, subject to contracts.

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

## February Retailer Measure of Experience (R-MeX) survey

The February Retailer Measure of Experience (R-MeX) survey is now open. Retailers have until Friday 28 February to review the services they have received from their wholesaler(s) from August 2024 to January 2025. To find out more about the biannual survey and what it means for trading parties, we spoke to Sam Webb, Head of Market Assurance:



### So what do retailers need to do?

“Retailers can access the surveys in their SharePoint folders, along with a copy of the survey guidance (which is also available in the ‘Help’ tab). Retailers can choose which wholesaler(s) they would like to review, although we strongly encourage them to review all wholesalers they have a contract with.

To ensure scoring is accurate, please ensure you answer all the questions and that your response is reflective of your whole experience, not just one or two individual or recent interactions. You only need to provide feedback on the services wholesalers are obligated to provide, rather than additional services.”

### How is this information used?

“Wholesalers’ scores will be added to the R-MeX dashboard, and will form a league table, which will be shared with trading parties. Wholesalers will also receive a copy of their responses, so they can act on any feedback as necessary.

The league table is a simple way for wholesalers to see how their scores compare against other wholesalers. The dashboard provides informative

comparative data, showing where wholesalers have improved or worsened since the R-MeX survey began in 2020. Ultimately it’s a tool to allow wholesalers to improve the services they provide to retailers (as their customers).”

### How does R-MeX fit into the BR-MeX survey?

“The R-MeX is a fundamental part of the upcoming Business Customer and Retailer Measure of Experience (BR-MeX survey), forming 25% of the total scoring. It’s currently in its shadow period, so the results of this survey will be shared with Ofwat and may be used to inform wholesalers’ BR-MeX scores.”

### Has anything changed?

“We aim to keep as much the same for consistency but have made a couple of tweaks following trading party feedback – one question has been removed due to it being measured in the Bilateral Hub, and another has been amended due to a change in wholesaler systems.”

You can find out more about the BR-MeX on the [Ofwat website](#). Keep up to date via the [R-MeX webpage](#) on the MOSL website.

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

## MOSL invites trading parties to Market Systems Resilience Workshop

Following the success of our recent system access denial workshop, MOSL is hosting another session for trading parties to improve market resilience.

The first workshop held in the autumn, covered a small number of system access denial scenarios to understand how market participants would respond in the unlikely event of market systems being inaccessible for prolonged periods. Whilst we all took valuable learnings from this workshop, it was clear that there would not be a single approach to managing this scenario. Responses will vary depending on trading parties' system interface and billing systems. Therefore, we are keen to invite more trading parties to participate before we move to further improve market resilience in this area.

The workshop will cover the following scenarios:

- CMOS outage for up to four business days (critical database failure)

- Bilateral hub outage for up to five business days (faulty vendor patch)
- CMOS outage for up to 20 business days (Ransomware attack).

Scenario planning offers an opportunity to:

- Understand the impact of various types of threat
- Test decision-making in a controlled environment
- Strengthen resilience by identifying gaps in MOSL processes
- Strengthen resilience by testing trading party Business Continuity Plans.

Angela Day, Head of People, Risk and Compliance, says: "The session in September raised several areas of consideration and improvement for MOSL and in turn we hope that it enabled trading parties to have the knowledge and confidence to review their own continuity plans. Desktop exercises are an ideal way to test scenarios and running them via Teams means we can remove barriers to

participation. It would be great if we can have more trading parties join the workshop in March."

The session takes place on Tuesday 4 March from 3–4.30pm on Microsoft Teams. Please email [Angela Day](mailto:Angela.Day) to register your interest. It is open to IT/Cyber specialists, Contract Managers and/or operational teams that understand code and commercial obligations.



## Trading party audit updates

Over the last three months, MOSL has been progressing the following audits:

### Unplanned Settlement Runs (USRs) causes

This audit aimed to gather information on data corrections that resulted in USRs and how to support timely and accurate settlement data. We completed the audit in January 2025 and identified deregistered supply points (SPIDs) and amended meter reads as the main drivers of USRs.

Trading parties typically identify potential USRs through regular data reviews and agree on requests either at the point of data amendment or shortly before submission. All audited trading parties have processes in place to capture and review retrospective amendments to learn from past

USRs. In 2023–24, 83% of USRs were post-RF, with 40% raised close to the cut-off deadline. This reflects trading parties' incentives to delay requests to avoid missing some subsequent retrospective amendments from their USR requests. 67% of the audited SPIDs received a new bill or refund due to the retrospective amendment examined. This evidences the customer impact of erroneous data in the market.

Some of the follow-up actions of this audit include speaking with trading parties that had USRs which failed to meet materiality threshold, to ensure they are conducting their due diligence to avoid non-material USR requests going forward. Follow-up actions also include proposing future audits (e.g. on meter reads validation processes).

The [findings report](#) is available on our website.

### Yearly Volume Estimates (YVEs) audit of settlement and customer impact

From a settlement angle, this audit aims to establish the amount of consumption artificially suppressed in settlement (as CMOS will cap consumption estimates based on the YVE value) and the number of meters affected by low YVEs, by retailer and by wholesaler. To assess customer impact, this audit looks to determine whether the calculations used by retailers when estimating YVEs are consistent with the estimation method used for bill calculations. For this element, we are working with CCW and expect to publish the findings in March 2025.

### Bilateral deferrals

We have recently started work on this audit, which aims to

understand:

- The processes that wholesalers have in place upon receipt of a service request to trigger a deferral
- The impact of deferrals on operational performance
- Which are the most used "permitted reasons" and their average length of time
- How common instances of non-compliance are with the deferrals' permitted reasons
- Whether deferrals are typically applied for the length of time the permitted reason applies.

This audit will support the fair application of new Market Performance Framework (MPF) metrics M18 and M15. The statement of work is available on our website. We expect to conclude this audit in the summer.

**Continue on next page >>**

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

## Trading party audit updates (contd.)

What are we doing to improve the audit function?

We have also been working through the feedback on audits from the latest Trading Party Survey (November 2024). We are taking practical steps to act on this feedback and will give more details in the March edition of Market Focus as well as at the User Forum in April.

For any questions, or to suggest an area where a trading party audit could add value, please raise a performance query on My MOSL.

## MOSL to submit a response to Water Commission Call for Evidence

The launch of the Independent Commission's Call for Evidence has been announced for 27 February. This follows a delay from the end of January to account for the deadline for appeals against Ofwat's Final Determinations (18 February).

MOSL will be submitting a response to the Call for Evidence on behalf of the MOSL Board. This will take account of trading parties experiences but will not be on behalf of the market nor seek to reflect all parties' unique challenges.

We will also be supporting the Strategic Panel with its responses by providing secretariat support. This will include organising an industry webinar with senior stakeholders to get views on key areas of the Call for Evidence. The webinar is likely to take place mid-late March. Invitations will be sent shortly. This webinar will inform the Panel's thinking but will also not be submitted on behalf of the market or market participants. If trading parties have particular views they would like

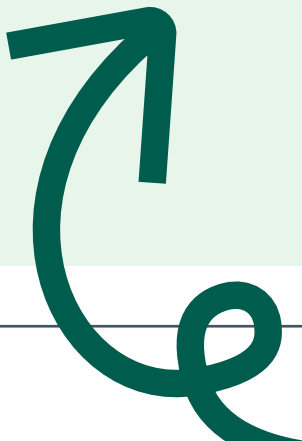
raised, we encourage them to respond directly. We are expecting Water UK and the UKWRC to submit responses on behalf of the organisations they represent.

As usual, we will share our response and the Panel's response on the MOSL website.

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

**Six water companies have appealed their final determinations to the Competition and Markets Authority.** They are:

- Anglian Water
- Northumbrian Water
- Thames Water
- Southern Water
- South East Water
- Wessex Water



## Data Assurance Service: MOSL introduces new service provider

At the beginning of February, we announced that we had appointed Identeq as the service provider for the Data Assurance business as usual service.

This decision came at a natural point in the programme as we assessed enduring options for the premises and address assurance based on the following criteria:

1. Cost and scalability
2. Future requirements (including transparency of the solution and its data)
3. Trading party feedback

On 31 January we notified the programme Steering Group of our intention to work with Identeq and sought their feedback on our proposed approach and communications to the market. The Steering Group was supportive of the decision, in particular the ability for us to run more frequent Data Quality Audits (DQAs).

The following week (3 February), we informed the Working Group prior to sharing the

announcement more broadly. At a follow up meeting on 11 February we introduced Working Group members to Identeq colleagues who ran through the proposed approach and timeline, as well as their solution. An email has also been sent from MOSL CEO, Sarah McMath, to trading party CEOs.

Members of the Working Group fed back some nervousness about the condensed timelines to run new DQAs before 1 April, but appreciated the increased cadence of the audits. The main concerns were on the potential for significant changes in volumes and what that would mean for wholesalers' resources. To support trading parties in planning their resources before the next financial year, we agreed to give members earlier visibility of the first Identeq DQA, caveating that the figures would be untested. The DQA will be shared with the market on 28 February.

Before 1 April 2025, we will be working with Identeq to run three DQAs and will be running a number of 121s and technical drop ins.

In order to focus on getting the premises and address audit in a strong position for the Business Customer and Retailer Measure of Experience (BR-MeX) to come into effect, we will be pausing pilot work on the retailer-led Phase 3: Customer name and occupancy. We will also be pausing further progress on the Eligibility assurance until we define what the enduring solution looks like.

We are holding a webinar on 24 February to walk all trading parties through the new process and programme timeline. Further information can be found on the [Event page](#) of the MOSL website. An updated programme timeline is also available on the Data Assurance webpage.

As we move to the next stage of the programme, we would like to thank Sagacity for supporting the assurance activities to date.

If you have any questions about the change in provider or the programme itself, please raise a query via My MOSL.



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

## Market Performance Framework Reform: Consultation now open

The [fifth consultation](#) on proposals to reform the Market Performance Framework (MPF) opened on Monday 17 February and is due to run until Friday 7 March.

The previous consultation, in September 2024, presented the design principles for the financial tools and incentives and which financial tool(s) would be used for each metric.

This consultation sets out the proposed performance standards for the six Phase 1 metrics – which includes almost all the chargeable metrics to be included in the new framework – as well as proposals for performance charges and charging cap.

Two pre-reading documents were issued ahead of the consultation. The first provided an overview and outlined proposals for the performance standards. The second, issued on 11 February, outlined proposals for the MPF's Cyclic Meter Read KPIs.

[Two further documents](#) have now been published: proposals for the MPF's Transfer Read

KPIs, including proposals for the performance charge 'cap', and a supplementary document containing more detailed rationale for some of the proposals. MOSL hosted a [webinar](#) from 1–2:30pm on Wednesday 19 February to run through the consultation and answer any questions. A further meeting has also been arranged for Thursday 27 February from 2–3pm.

The quantitative results from the consultation are due to be published on Friday 14 March, followed by the qualitative results the beginning of April. The key themes from the consultation will be presented at a face-to-face event in London on Thursday 24 April.

Commenting on the consultation, Miles Robinson, Programme Manager, said:

"We're delighted to have reached what we hope is the final consultation for the new framework. We are very grateful to trading parties for their continued support and patience throughout the programme, and particularly the members of the working groups. We look forward to stakeholders' feedback and beginning the implementation phase."

Subject to the results of the consultation, three new metrics will go live in April, i.e. those that MOSL will be monitoring for inclusion in Ofwat's Business Customer and Retailer Measure of Performance (BR-MeX).

April will also mark the start of the 'shadow period' for the MPF's priority KPIs, during which trading parties' performances will be measured using the new MPF but will not be charged under the new framework until it goes live in November 2025.

If you wish to receive more information about the consultation, please ensure you are registered on the MPF mailing list.



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

## Bilateral Transactions Programme: Bilateral Hub update

As the programme prepares for tranche 1 of the final phase to be delivered into the Bilateral Hub in March, planning for the transition from improvement programme to business as usual continues.



The programme has delivered higher savings and greater customer benefits than anticipated in the Full Business Case. With the combination of the original Ofwat mandated CPW070 and the additional enhancements through CPW139, the hub is on track to deliver £1.4m in annual benefits against the business case of £1.2m.

The 116th and final Operational Advisory Group (OAG) meeting will take place on 6 March at 11am. The OAG has been an integral part of the programme's success and we would like to take this opportunity to thank all advisory group members for their input and support over the course of the programme. Their expertise and advice on operational process changes has been invaluable.

To date the programme has:

- Delivered 14 releases (and one under way)
- Re-engineered 65 legacy processes
- Supported more than 215 code document code changes.

This has resulted in an estimated 180,000 hours saved, equating to £4m million in efficiency savings overall.

To support the Hub going forward, the Retailer Wholesaler Group (RWG) Steering Group is considering a proposal to create a new RWG Bilateral Sub-group which, if approved, will be created in spring 2025. To register your interest in this group please email [RWG@mosl.co.uk](mailto:RWG@mosl.co.uk). Any additional enhancements, which the OAG has supported but have not been implemented, will be passed to the RWG for consideration

We would like to remind trading parties that from 1 April, anyone wanting to make changes to the hub will have to follow the MOSL change process. Releases will follow the same process as CMOS and will be implemented one week after a CMOS Release.

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

# Strategic Metering Review: Reflecting back and looking forward

In 2022, MOSL and the Metering Committee developed a three-year programme of work.

The programme included three key themes: developing a national metering strategy; improving the meter reading process and making granular consumption data available to all.

Three years on, MOSL programme sponsor, Steve Formoy, reflects on some of the highlights, and the Committee's plans for the next three years:

"Looking back, probably the highest-profile project was the [National Metering Strategy](#).

Nearly 800,000 business customers are due to have their meters replaced or upgraded to 'smart' in the next asset management period (AMP), but in early 2022 it wasn't clear from draft Water Resource Management Plans (WRMPs) that this would be the case.

To ensure the business market was factored into companies' plans and that they were sufficiently ambitious, the Committee

supported the Strategic Panel in developing an interim metering strategy. This was followed by a more detailed metering strategy in March 2023, which set out a series of recommendations to help companies take a more consistent approach when rolling out smart metering to maximise the benefits for business customers.

Despite not being code-mandated, the strategy has been very well received by trading parties and is being used in a variety of ways as they start to mobilise their rollouts. An RWG group considering a consistent approach to communicating the rollout is finding the strategy particularly useful.

Much of the Committee's other work is lower-profile, but no less valuable, such as its work to address issues at every stage of the meter reading process, from locating and reading meters – including those that are 'hard to read' or 'long unread' – to ensuring meter reads enter CMOS successfully.

Committee members also led a series of successful Market Improvement Fund (MIF)

projects, from researching 'broken' meters to piloting a process to transfer smart meter reads directly into CMOS.

In many cases, there is simply a need for 'best practice' guidance to help agree and clarify trading parties' roles and responsibilities in relation to practical issues such as clearing meter chambers or what constitutes a 'hard to read' meter.

Overall, it has been an incredibly productive three years and we are now planning deliverables for 2025/26, which includes developing the business case for a solution to help wholesalers and retailers share meter data as efficiently as possible (see [Market Focus, January 2025](#)). We look forward to sharing more in coming weeks."

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

# RWG **Corner**

Hear updates from the Retailer Wholesaler Group (RWG) Co-Chairs, Fallon Wilkinson and Mike Rathbone.



## Wholesaler Chair Appointment

Following a call for nominations, Gerard Lyden has been appointed to the role of wholesaler Chair. Gerard will co-chair the RWG with Fallon Wilkinson (retailer Chair) from 1 March 2025 until 1 July 2026.

Gerard succeeds Mike Rathbone, who is stepping down from his position following three years as wholesaler Chair. We would like to thank Mike for his contribution to the RWG and non-household market and wish him well for the future.

## Vice Chair roles

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

Fallon says: "Being RWG vice chair is a great opportunity to make changes in the market, making it better for trading parties and our customers. It's also a lot of fun working with colleagues from across the industry."

## Tariff Sub-group request to wholesalers

The Tariff Sub-group recently published a request to wholesalers to provide additional information to retailers and customers on wholesale price increases in AMP8 (see Panel update section). You can [download the communication request here](#) or via the sub-group webpage.

The group will also be releasing a Metered Tariffs Good Practice Guide at the end of February – please ensure you are signed up to receive RWG emails to be notified of its publication.

## Save the Date – Summer In-Person Meeting

The next RWG in-person meeting will take place on Tuesday 24 June 2025 at the Park Plaza hotel in Leeds. Please save the date in your diaries.

## Upcoming RWG meetings

- 20 Feb – Water Efficiency Sub-group
- 26 Feb – Sub-group Chairs quarterly meeting
- 28 Feb – Customer Contact Details Sub-group
- 6 Mar – Smart Meter Roll-out sub-group/ Tariffs Sub-group
- 17 Mar – Smart Meter Roll out Sub-group
- 19 Mar – Steering Group

## Strategic Panel update

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



At our 5 February meeting, the Panel reflected on the PR24 final determinations and their potential impact on customers and the market. As a Panel, we are particularly concerned about the potential impact of price rises on customers, many of which are frontloaded for year one (2025/26) of the next AMP.

I would encourage all wholesalers to respond to the request issued by the RWG to provide an [additional AMP8 information sheet](#). The Panel noted that there is currently a lack of specific information for retailers or business customers in wholesalers' published vulnerability strategies. We are keen that wholesalers provide retailers with the information they need to ensure that the impacts on vulnerable customers can be minimised, recognising the higher increase in wholesale charges for business customers.

We also discussed progress on the delivery of actions set out in our [Roadmap to a Flourishing Market](#). While there is no doubt that delivery will be challenging, at this early stage we are pleased with the level of engagement from stakeholders.

Further information on the decisions and [discussion points from our February meeting is available here](#).

Looking forward, the Panel will be particularly active in the coming weeks as it works to formulate its response to the Independent Commission's Call for Evidence, which is expected to be issued at the end of February. While the Panel will work to develop its own independent position, we will be holding an industry workshop to hear views from across the market to inform our thinking.

I am also pleased to confirm that the [Panel Nominations Committee](#) has agreed to reappoint independent members Pamela Taylor, Paul Smith and Rick Hill for a further term. The Panel has also agreed to reappoint Anthony Pygram as Chair of the Code Change Committee. This is a demonstration of the excellent contribution all parties have made in progressing the interests of customers and the market.

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

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



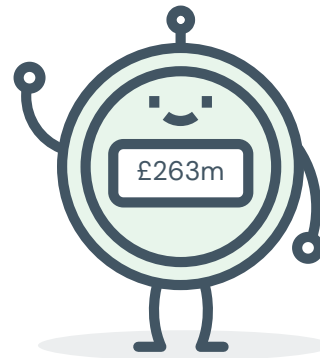
## Monthly Market Stat

### The numbers game

“Monthly settlement for water and sewerage charges will increase by £67m to around £263m by March 2030, compared to its level of £197m in Dec 2024.”

For this month’s market statistic, we wanted to understand what the increases to water company charges, announced last month, would be on the non-household market. We’ve applied the percentage average bill increases published by [Ofwat](#) to our latest view of settlement shown on the [MOSL Settlement Run dashboard](#).

In December, Ofwat published its final determinations (PR24) on what wholesalers could charge customers over the next five-year period. PR24 will see significant bill increases for both household and business to fund infrastructure projects to increase water quality and security and protect the environment. As retailers bill business customers, wholesalers need to ensure retailers are involved and aligned with the messaging around these bill increases



to ensure business customers are aware and prepared to manage the impact of bill rises. The Retailer Wholesaler Group (RWG) has recently published a request for wholesalers to communicate with their retailers and have issued a [guidance document](#) on what to include (see [page 20](#) for more information.)

Source: CMOS D1 settlement data on [Settlement Run dashboard](#) Best Available for Dec 2024 in February 2025

Ofwat average bill increases between 2024-25 to 2029-30 from [Ofwat website](#)

### CMOS stats January 2025

Number of High Volume Interface (HVI) transactions submitted	566,466
Number of Medium Volume Interface (MVI) transactions submitted	202,114
Number of Low Volume Interface (LVI) transactions submitted	44,701
Total transactions submitted	813,281 – 6% decrease from Dec
CMOS Notifications sent	1,569,652
Number of active users in CMOS (GUI)	5,401
Maximum number of concurrent users	550
Unplanned outages	1
Number of Unplanned Settlement Runs (USRs)	60
Number of Market Dataset (MDS) reports generated	16,943



## Behind the mailbox: Angela Day

This month we're learning more about Angela Day, Head of People, Risk and Compliance:



“Hi, I’m Angela. Cut me in two and I’d have the word ‘people’ running through me like a stick of rock. Having always been nosey about the human condition, I went into an HR career following a degree in Social Anthropology and have been in HR now for over 25 years.

My job at MOSL is two-fold (although there’s lots of natural overlap). In my people leadership role, I focus on developing a culture of inclusion and openness by bringing the MOSL values to life and enabling MOSL colleagues to grow their potential whilst delivering an excellent service to the market.

In my Risk and Compliance role, I am leading on our risk strategy and ensuring that MOSL manages its risks and remains compliant with our obligations to the market. I have a small (but perfectly formed) team of two knowledgeable and passionate experts, so we work closely together and all muck in to ensure we support and enable colleagues to do their best work. I have the privilege of getting to know every colleague, of working closely with our Board, working with trading parties and, at times, popping up at Panel

Committees, such as the Performance Assurance Committee (PAC). There are not many jobs that give you such breadth within our industry.

MOSL’s culture is like nothing I have experienced in my career; where colleagues genuinely live the values, have a drive to deliver excellence for trading parties and the broader market, and are just a great group of people to spend time with.

When I am not spending time with colleagues, I love to be out enjoying nature, mostly through long walks. Living close to the beautiful River Test, I have lots of beautiful walks to choose from.”

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

## MOSL on the Move

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

### The British Water Data Conference

On Thursday 6 February, Simon Powell, CIO at MOSL, attended the British Water Data Conference in Warrington. This year's event focused on integrating smart infrastructure and IoT technology to clarify cybersecurity needs, improve water efficiency, and strengthen catchment management. In his slot, Simon discussed how the water sector will adapt to the exponential increase in data once smart meters are installed across England.

### Net Zero: How we get there - Water

On 18 February, Sarah McMath, CEO and Lyv Nabarro, Head of Market Engagement and Communications at MOSL attended the Women's Utilities Network Net Zero event in Birmingham. Sarah joined a Panel of industry experts to explore two topics – how can the

water industry achieve net zero and are we on track, and net zero ambitions impacts on water demand. Find out more on [the event page](#).

### Virtual User Forum

The [February User Forum](#) takes place on Wednesday 19 February from 3–5pm via Microsoft Teams. Agenda items include a look at our smart meter rollout dashboards, an update on the tracking of [Roadmap to a Flourishing Market](#) actions and a feature on 'Managing increased demand in water stressed areas' by professional services firm, WSP. Take a look at the agenda and join the meeting via the [event detail page](#).

### Independent Commission Call for Evidence launch event

On 27 February, Lyv Nabarro will be attending the launch event for the Independent Commission's Call for Evidence. Independent Chair of the Commission, Sir Jon Cunliffe, will be delivering the keynote to invited stakeholders from across the water industry. MOSL will be submitting a response to the Call for Evidence in due course.

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

On Thursday 6 March, the Institute of Water's Women's Network will be holding an online event in celebration of International Women's Day. Join from 9.30am–12.30pm to hear influential voices, such as MOSL CEO Sarah McMath, discuss how we can support inclusion and accelerate action in the water sector aligned to this year's theme. [Click here for more information](#) and to sign up for this event.

### Waterwise Annual Conference

A number of MOSL colleagues will be attending sessions from the online Waterwise Conference which takes place 10 – 13 March. Topics range from sector ambition and innovation to fostering a water-saving culture and sustainable water use. Find out more and [book your tickets on the new Waterwise website](#).



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

## Making changes

### Your change proposal update

#### Recommendations

At the 11 February Code Change Committee meeting, [BR-MeX \(CPM052 & CPW140\)](#) was recommended to Ofwat for implementation. This change facilitates MOSL providing data to Ofwat to calculate BR-MeX (Business Customer and Retailer Measure of Experience) scores as set out in [PR24 final determinations](#). The data includes results of the B-MeX survey, R-MeX survey and three Market Performance Framework (MPF) performance metrics. Find out more about BR-MeX on [page 11](#).

#### Consultations

A consultation on [Post RF Customer Refunds \(CPW152\)](#) is running until 28 February. This change seeks to address issues customers have had obtaining refunds after the

final settlement run and after the window for Unplanned Settlement Runs closes 44 months after the invoice period. A Request for Information (issued October 2024) sought information to support the business case for this change. This consultation will focus on the proposed solution, which has been developed with advice from a working group.

#### Join the conversation!

Follow us on social media

 Market Operator Services Limited (MOSL)

 [mosl.water](#)

 [@MOSL\\_](#)



#### MOSL mailing lists

Receive the updates you're interested in by keeping your email preferences up to date. [Subscribe to receive emails here](#), and update your preferences at any time by selecting 'update subscription preferences' at the bottom of any email you receive from us.

