

# Market Focus

News from the  
heart of the market



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# Welcome to the April edition of Market Focus

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



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## A message from Simon Powell, Chief Information Officer

Welcome to April's edition of Market Focus.

I hope you and your teams have managed to enjoy some of the sunshine as spring arrives.

This month feels like a big milestone for the business retail market. Not only does 1 April mark eight years since it opened, but this month also saw the implementation of a new measure: Ofwat's Business Customer and Retailer Measure of Experience (BR-MeX) and the start of AMP8 – the 2025–30 Asset Management Period for wholesalers.

MOSL colleagues have been working hard to get us to this stage but, in many ways, this is just the starting point. During AMP8, MOSL will be responsible for collecting data for all components of BR-MeX and will continue to work behind the scenes to support the systems development, reporting, and engagement with the market. It was a team effort across MOSL and the market to enable BR-MeX to go live, and I'd like to take this opportunity to say that I'm especially proud of my team for providing (often unsighted) expertise and input to our many improvement programmes, including BR-MeX. You can find out more on [page 5](#).

At the beginning of this month, we also had to announce the tough decision to delay the start of the new Market Performance Framework (MPF) shadow period. The

delay is due to a number of factors, principally the requirements gathering taking longer than anticipated and considering feedback from trading parties to consultation 5. As communicated, the shadow period will now begin in May instead of April, with the first reports available for transfer meter reads in June and cyclic reads in July. This does not impact the in-person feedback session taking place on 24 April. Find out more on [page 8](#).

I hope it goes without saying that we recognise these delays – including the delay to the latest tranche of the Bilateral Transactions Programme ([pages 9–10](#)) – have an impact on trading parties. The MPF in particular, has run with a risk to timing and delivery for a number of months. Whilst we endeavour to mitigate risks, occasionally we do need to review and make amendments to programme plans. On behalf of MOSL, I would like to thank you and your teams for working closely with us as we prioritise and replan accordingly.

With that said, I hope you find this month's Market Focus a helpful update on activities across MOSL and the market.





## Dates for your diary

**8 April:** [Code Change Committee 38](#)

**14 April:** [Strategic Panel 17b](#)

**15 April:** [Metering Committee Meeting 49](#)

**16 April:** [Virtual User Forum](#)

**16 April:** [Market Systems Resilience Workshop](#)

**24 April:** Independent Water Commission Call for Evidence deadline

**24 April:** [MPF Consultation 5 face-to-face feedback session](#)

**25 April:** [Performance Assurance Committee 6](#)

**25 April:** [Code Advisory Group 109](#)

**28 April:** Market Improvement Fund Selection Committee

## MOSL publishes latest R-MeX results

We have published the results from the latest [Retailer Measure of Experience \(R-MeX\) survey](#).

As a reminder, the R-MeX survey gives retailers the opportunity to review the core services provided by their wholesaler(s). The scores given also form 25% of a wholesaler's Business Customer and Retailer Measure of Experience (BR-MeX) score.

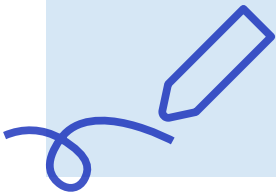
As mentioned in last month's Market Focus, we received a record 18 submissions out of the possible 21 eligible retailers, which accounted for 99.4% of the supply points (SPIDs) in the market and 97.9% of the consumption.

We would like to commend Affinity Water, who has maintained the top position on the league tables for the seventh survey running. We would also like to highlight Thames Water, who received the three largest increases in survey scores across 'Engagement and Support', 'Effectiveness of Financial Policies', and 'Overall Services'.

Overall, nine wholesalers improved or maintained their position in the league table, which ranks wholesalers by their average scoring.

The [R-MeX dashboard](#) and the [R-MeX webpage](#) have been updated with the latest results and league tables. You can also find out more on the results of the survey by downloading [the survey commentary](#).

The next R-MeX survey will take place in August 2025.



## BR-MeX has gone ‘live’

Following Ofwat’s approval and the subsequent implementation of the Business Customer and Retailer Measure of Experience (BR-MeX) code change, BR-MeX went ‘live’ on 1 April 2025.

Through the inclusion of three of the Market Performance Framework (MPF) Key Performance Indicators (KPIs) that form part of BR-MeX, wholesalers will be encouraged to keep their premises data up-to-date (M12) and complete bilateral requests in a timely manner (M18 and M15).

The new KPIs will first be reported from May 2025 (for performance observed in April 2025). Their implementation will also mean that the current wholesaler Operational Performance Standards (OPS) will be retired from April.

Inclusion of these KPIs in BR-MeX creates a step change in the level of financial incentives on wholesalers to deliver good service to business customers.

In developing and implementing the new measure, Ofwat said that the final design achieves a balance between quantitative and qualitative elements, with a “scale of incentive that should drive meaningful improvements in the

service levels experience by business customers and retailers.”

Over the next five-year AMP period that BR-MeX is in operation, MOSL will be responsible for collecting data for all components of BR-MeX. Ofwat will be responsible for calculating and publishing the overall BR-MeX scores for each wholesaler.

Ofwat will shortly be publishing an overview of the BR-MeX process and will hold a further workshop later in the year to share results and discuss the process so far.

As a reminder, the recording of the BR-MeX webinar MOSL held at the end of March, which includes an [introduction to the B-MeX survey agent](#), can be found on our website.

If you have any questions, please visit the [Ofwat BR-MeX webpage](#) or email [Robert.Hetherington@ofwat.gov.uk](mailto:Robert.Hetherington@ofwat.gov.uk).



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## Market Improvement Fund: ‘Incentivising non-household water saving’ project publishes final report

We’re pleased to announce that a Market Improvement Fund (MIF) project exploring the potential for a centralised, retailer-neutral incentive scheme to drive water efficiency in businesses has been published.

The project was delivered by Waterwise in partnership with Weir The Agency and was sponsored by Wave Utilities. It set out to understand what such a scheme could look like and whether there is appetite for it across the market.

We spoke to Rachel Dyson, Project Manager at Waterwise, to find out more:

### **What were the main successes or conclusions drawn from this project; did it achieve what it was set out to do?**

“Yes, the scoping study achieved its aim of assessing appetite for a centralised incentive scheme to help non-household organisations install water-saving products. Engagement

with businesses and stakeholders confirmed strong support, particularly from public sector organisations and SMEs, and a preference for independent or government-led delivery. The scheme could also align with the UK mandatory water efficiency label.”

### **Were there any findings that were particularly unexpected?**

“It was striking how many businesses were unaware of existing water-saving incentive schemes, often discovering them only by chance. This highlights the need for better visibility, clearer communication, and more consistent promotion across the market.”

### **What’s next?**

“We hope the findings will inform a pilot through Ofwat’s Water Efficiency Fund and feed into the RWG Water Efficiency Sub-group’s work, specifically step two of its Roadmap: “creating the imperative for non-household customers to take action to reduce or optimise their consumption.”

The full report can be downloaded via the [Waterwise website](#) or the [project update page](#).

## **Selection Committee shortlists applicants for MIF round four**

The Selection Committee, made up of a sub-set of the Strategic Panel, met at the end of last month to review the 13 applications which applied for up to £200k of funding for the fourth round of the fund.

The committee shortlisted seven applicants who have been invited to present their projects on 28 April. The committee will select and announce the successful projects in May 2025.

We look forward to bringing you more information in next month’s Market Focus.

## Data Assurance Service: this month's progress

As noted in the BR-MeX update ([page 5](#)), on 1 April we went live with three metrics that form part of the reformed Market Performance Framework. This includes M12 – the quality of wholesalers' premises and address data.

We have continued to make good progress supporting trading parties with the premises and address assurance activities with IDenteq as our new provider. Since moving to IDenteq in February, we have published four Data Quality Audits (DQAs), which now run fortnightly. This has been supported by updated guidance on changes to the service and assurance criteria and regular technical drop-in sessions with trading parties. We would like to thank all trading parties for their continued focus and determination in addressing their supply points and working with MOSL and IDenteq colleagues.

From the first DQA on 4 February to the latest (data from 11 April), premises flagged as 'of concern' have reduced from 69% of

the supply points provided for assurance to 61%. This is a result of wholesalers reviewing their supply points and as the audit criteria becomes more robust.

At the programme working group meeting on 25 March, we presented the programme plan and the proposed relaunch of Phase 1: Eligibility Assurance. We paused this work as we transitioned to IDenteq and to focus on the M12 metric in preparation for 1 April.

Working group members fed back concerns with relaunching Phase 1 in April as resources were prioritised for premises and address assurance. Noting this feedback, we have reviewed and revised the plan to allow more of an airgap between the assurance activities. We are now planning on relaunching eligibility from 2 June and will provide further information in due course.

The working groups slides, and updated programme plan are available on the [Data Assurance webpages](#).

Programme Manager, Spencer Mattia, said, "We have been really pleased with the way trading parties have engaged in the assurance process as we transitioned to IDenteq.

The technical drop-in sessions have proven invaluable in answering trading parties' questions and gaining feedback on the service to help us improve the robustness of the criteria and the user experience. We are confident that the programme will go from strength to strength as we relaunch Phase 1 and continue to pilot Phase 3: Customer Name and Occupancy with retailer working group members."

If you would like to receive updates on the Data Assurance Programme, please [sign up via our website](#) or update your preferences on any email you receive from us. If you have any questions, please contact us via My MOSL.





## Market Performance Framework: Last consultation nears completion

The reform of the Market Performance Framework (MPF) is one of the most important and longest-running programmes since the opening of the non-household market.

In the programme's fifth – and final – consultation, which closed in March, trading parties and other stakeholders were asked for their views on the:

- Proposed performance standards for six new key performance indicators (KPIs)
- Performance Assurance Committee (PAC) to be able to adjust KPI performance standards by +/- 5% in a given 12-month period
- Proposed performance charges for the new KPIs
- Level of an overall performance charge 'cap'

We had an excellent response to the consultation, with 21 responses, including 12 wholesalers, eight retailers, and CCW.

The quantitative results were published on 14 March, and we are due to publish stakeholders' verbatim comments, responses to individual comments, and key themes ahead of a face-to-face meeting in London on 24 April.

At the event, MOSL will play back the key themes it has identified from the consultation and the team's "minded to" position on each, i.e. whether MOSL agrees with the feedback and proposes to make a change as a result; disagrees and proposes to move ahead as outlined; or requires more information.

Earlier this month, MOSL announced it had made the difficult decision to delay the 'shadow period' for the implementation of the six new phase 1 key performance indicators by one month, from April to May. During the shadow period, trading parties will receive performance reports based on the MPF's new metrics but will not be charged against them until the programme goes live.

Following discussions with the programme's Steering Group, MOSL is replanning the final delivery timeline for the programme to ensure

trading parties have at least six months' performance reports during the shadow period. This will also help determine the go-live date between December 2025 and February 2026.

Programme Manager Miles Robinson said: "There is a huge amount going on in the MPF programme at the moment.

Three new KPIs went live as planned in April that will form part of Ofwat's Business Customer and Retailer Measure of Experience (BR-MeX), and we have been very busy analysing feedback to consultation 5, which we look forward to presenting on the 24 April.

We also look forward to confirming the roadmap to go live, which is a very exciting prospect!"



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## **Bilateral Transactions Programme: final phase rollout rescheduled for December 2025**

Last month we shared the revised plan for Phase 15 of the Bilateral Transactions Programme following the decision to combine both tranches one and two and schedule all enhancements for 16 December 2025.

The revised programme provides time for the subject matter experts, technical teams and trading parties' testing teams to develop and test a comprehensive, high-quality release.

Following trading party feedback about the revised programme, we have made some adjustments to support the rollout.

### **Assurance testing**

Assurance testing is scheduled for the w/c 16 June and will last for six weeks, extending the initial testing window to 31 July. The period between assurance testing and go-live enables a second development cycle to account for any bug fixing and/or issues in the pre-production environment during the integration and assurance testing. This will allow us to confidently deliver the release later this year.

We will also continue to release new functionality into the pre-production environment between April and June, enabling trading parties to test the

functionality well ahead of the go-live date. The data logging process (B2), for example, is currently under development and will be added to pre-production on 16 April, subject to testing completion.

We would like to thank trading parties for their support as we prepared the revised programme.

Due to a clash with a Market Performance Framework Reform consultation meeting, the next Contract Managers update has been rescheduled for 1 May at 2pm.

If you have any questions, please raise a query on My MOSL.

### **Q&A**

On the next page...



## **Bilateral Transactions Programme: Q&A**

**How confident are you in the new release time? Will it move again?**

We are confident that it will not need to move again.

**Why is there a six-month gap between assurance and roll out?**

We have prioritised the delivery of the Ofwat-mandated Market Performance Framework Reform (MPF) and Business Customer and Retailer Measure of Experience (BR-MeX) programmes. However, the additional time will also allow for more testing and a second development cycle, if needed.

**Why have the MPF Reform and BR-MeX programmes been prioritised over the Bilaterals programme?**

The BR-MeX and MPF Reform programmes have an Ofwat-mandated commitment for delivery. Noting the significant overlap in MOSL's critical resources in Q1 2025/26, it was considered best to prioritise the timely delivery of these programmes. We recognise, however, the impact this has on trading parties' own resources and have tried to mitigate this as best as possible through our revised plan.

**When can I start testing in the pre-production area?**

Trading parties can continue testing as before, and we will continue to add to the pre-production environment as more functionality is developed.

**Is there a team continuing to work on Phase 15 or has it been paused?**

We continue to have CGI support for the release and our development teams will undertake further work in May.

**Will any of the current changes be rolled back?**

The deployments that have already been made to User Acceptance Testing will not be rolled back.

## RWG Corner

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

### Sub-group updates

The Smart Meter Roll Out Sub-group has published a [summary of responses](#) following the recent consultation on effectively communicating with customers during the roll out of smart meters. The market response to the consultation showed strong support for the customer engagement plan; however, it also identified a number of significant dependencies. The sub-group has set out the [next steps](#) with an aim to publish a final good practice guide by June 2025.

The Customer Contact Details Sub-group is looking to publish a request for information (RFI) later this month to gather information and check levels of support for different ways to obtain and share 'operational' customer contact details. It will include how to mandate or incentivise this and whether it would make

sense to differentiate requirements for different segments of customers, such as sensitive customers.

The Wholesale Tariff Simplification Sub-group would like to thank all wholesalers who responded to the request made in February 2025 to provide retailers and their customers with [more information on the 2025/26 wholesale price rises](#).

### RWG summer in-person meeting

The [next RWG in-person meeting](#) will take place on Tuesday 24 June 2025 at the Park Plaza in Leeds. Booking details will follow in May.

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

### Vice Chair roles

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

### Find out more

If you would like to hear more about RWG activities, you can [sign up for updates](#) in just a couple of minutes.

### Upcoming RWG meetings

- **17 April:** Water Efficiency Sub-group
- **24 April:** Wholesale Tariff Simplification Sub-group
- **31 March:** Steering Group
- **6 May:** Planned and Unplanned Events Sub-group
- **14 May:** Sub-group Chairs
- **15 May:** Water Efficiency Sub-Group





## Strategic Panel update

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



The Panel and its dedicated subset have been busy pulling together our response to the Independent Commission's water sector review [call for evidence](#). We will be submitting this ahead of the 23 April deadline and, as usual, it will be published on the MOSL website.

Thank you again to everyone who attended the industry workshop we held on 17 March to help identify areas of common thinking. We have published a [summary of this session](#).

On 14 May, the Panel will hold its next in-person meeting in London. The meeting will include a discussion with Ofwat CEO, David Black, on the strategic outcomes for the market and how Ofwat and the Panel can work together to address blockers and enablers for progress.

The Panel will also be discussing the role of regulation to support good customer outcomes and growth ahead of Ofwat's review of the Retail Exit Code (REC) default tariffs in the market. This review is due to commence later this year, with updated

tariffs coming into force from 1 April 2027.

It has also been a busy month in terms of recruitment for the Panel and its committees. On 9 April, the Panel Nominations Committee met to consider the [nomination](#) received for the current wholesaler member vacancy on the Strategic Panel and agreed that the candidate should be taken forward to interview. This follows the window to submit nominations which closed on 2 April. We will provide a further update on the outcome next month.

We were also pleased to approve the appointment of Angela Brown (Northumbrian Water) as a wholesaler member of the Code Change Committee. Ben Kershaw (Wave), Cillian McCarthy (Everflow), and Jordanna Lo (Business Stream) have also been appointed as retailer members of the Metering Committee.

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).

## Making changes: Your change proposal update

### New change proposals

At its 8 April meeting, the Code Change Committee agreed the following changes passed the Acceptance and Prioritisation Criteria (A&PC) and accepted them into the change process:

- Estimated Transfer Reads (CPW159), raised by the Metering Committee, seeks to reduce occasions where consumption is estimated when a customer transfers between retailers. It will clarify when an estimated read can be used in place of a read taken by the retailer or the customer.
- Third Party Requests to Wholesalers (CPW161), which was raised by a third-party providing water saving services, seeks to improve engagement between wholesalers and third parties appointed by customers to provide water management and data services. Currently, the codes do

not recognise such third parties which the proposer believes leads to inconsistent approaches by different wholesalers and, in some cases, poor customer service.

- Cyclic Read Skip Codes (CPW162) was raised following stakeholder feedback in MPF consultation 4 regarding visibility of why retailers are unable to obtain a meter read. It proposes to build on the RWG's work to define standard reasons for not providing actual cyclic reads and mandate their collection in market systems. The RWG is proposing to establish a sub-group that could use this data to define processes and responsibilities for resolving meter-reading issues.

### Recommendations

No changes were recommended at the 8 April Code Change Committee meeting.

### Consultations

A consultation for Customer and Third-party Access to Consumption Data (CPM060 & CPW156) will run 28 April to 19 May. This change seeks to allow access by approved third parties and representatives of customers to their consumption data. The proposer hopes this change will facilitate environmental reporting obligations in the commercial real estate sector, but it could also support other stakeholders interested in water efficiency.

A consultation for Cyclic Read Skip Codes (CPW162) (see above) is expected to be issued in May 2025.

### Implemented changes

BR-Mex (CPM052 & CPW140) was implemented into the market codes on 1 April. The Business Customer and Retailer

Measure of Experience (BR-MeX) incentivises good service delivery by wholesalers in the business retail market as set out in Ofwat's PR24 final determinations. This change implements the processes necessary for MOSL to collect and provide data to support Ofwat in calculating BR-MeX scores (see more information on page 5).

### Post Implementation Review

Change Process Improvements (CPM053 & CPW146) was implemented in December 2023 to create a more flexible and agile process that prioritises impactful change. The revised process also allows changes to "fail fast" and MOSL to develop solutions instead of, or in addition to, the proposer. The CCC began its review of the outcome and effectiveness of the new process at its April meeting.

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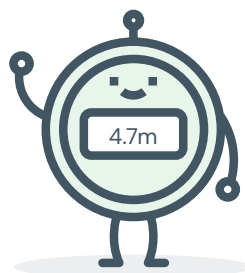


## Monthly Market Stat

### The numbers game

“When the market was designed in 2015, there were no smart water meters, and systems and processes were scaled to assume that 99% of meters would be read biannually and 1% would be read monthly. This would equate to ~2.7 million cyclical reads per year. By contrast, now, 9% of business water meters are smart, and the total number of cyclical meter reads sent to CMOS in 2024–25 was 4.7 million.”

For the five-year Asset Management Period (AMP) which starts this month, the water industry in England has committed to implementing around 800k new or upgraded smart meters into the business water market, meaning around 66% of business meters will be smart by 2030. To realise the benefits from smart metering, such as more accurate billing and demand reduction, the frequent reads that smart meters provide will need to be shared centrally within the market. With a conservative assumption that each smart meter will send one read a month to the Central Market Operating System (CMOS), the number of cyclical reads sent annually will more than double, from 4.7 million in 2024 to 10 million in 2030.



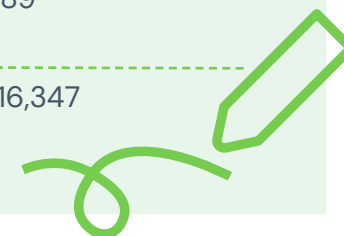
MOSL and the Metering Committee are currently working with the market to review solutions to manage the increased volumes of meter reads and enable the market to realise the full benefits of smart metering implementation for businesses.

Find out more about the Request for Information on the [data sharing hub](#).

Source: [Metering dashboard](#) and [Meter Reading dashboard](#) March 2025

## CMOS stats March 2025

Number of High Volume Interface (HVI) transactions submitted	912,951
Number of Medium Volume Interface (MVI) transactions submitted	310,378
Number of Low Volume Interface (LVI) transactions submitted	46,526
Total transactions submitted	1,269,855 – 49% increase from Feb
CMOS Notifications sent	1,920,105
Number of active users in CMOS (GUI)	5,150
Maximum number of concurrent users	581
Unplanned outages	0
Number of Unplanned Settlement Runs (USRs)	89
Number of Market Dataset (MDS) reports generated	16,347





## Behind the mailbox: Sam Mawby

This month, we're speaking to Sam Mawby, Governance Manager.



"Hi, I'm Sam.

My working life has developed organically (or some might say it has been "unplanned"! ) Since graduating with a History and Literature degree a long, long time ago, I have worked in a variety of sectors, and in a number of roles, gathering skills and experience along the way (newspaper advertising, insurance, social housing, NHS, education, and now water!). Like so many other governance professionals I have spoken to over the years, I came across the world of governance by chance and, nearly 20 years later, it is still stretching and engaging me.

I joined the Legal and Governance team at MOSL in May 2021, initially supporting the set-up of the Strategic Panel and then the Code Change Committee. Currently, I am supporting the RWG (Retailer Wholesaler Group) to ensure it has the structure, visibility, and practical support necessary to deliver on its various activities and projects. I have enjoyed being able to work more closely

with a wider range of trading party colleagues since taking on this role and I am regularly blown away by the time and expertise that so many give to driving change in the market for the benefit of customers.

I am also part of the MOSL Green Team. I support the delivery of our Sustainability Plan with our most recent activity being a lunchtime litter pick for The Great British Spring Clean!

Outside of work you can usually find me out for a walk in the beautiful New Forest where I live or curled up with a good book, often with a mythological theme!

If you want to find out more about RWG, or get involved with a group, please contact me at [rwg@mosl.co.uk](mailto:rwg@mosl.co.uk)."



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## 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.

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

On 2 April, MOSL took part in a roundtable at Bristol Digital Futures Institute on business-led water conservation. The event brought together stakeholders from the water industry, business sector, fintech, and the water efficiency space, including representatives from Waterwise, Shakespeare Martineau, and researchers from the University of Surrey and University of West England. John Gilbert, Head of Planning and PMO at MOSL and Richard Tidswell from Waterwise outlined how the business water market works and demoed our water efficiency dashboard. The roundtable explored how we can drive business-led solutions through smarter incentives, regulatory frameworks, and technological innovation to meet the predicted shortfall of 4.8 million litres per day by 2050. [Read a full write-up here.](#)

### Smart Water Systems Conference

On 16 April, MOSL's Chief Information Officer, Simon Powell, presented at the Smart Water Systems Conference in London. Simon spoke about developing the business case for a data sharing mechanism that will support the business water market to better manage and make available the increased volume of smart meter data. You can [find out more about the conference](#) on the event website.

### MPF Consultation 5 face-to-face feedback session

On Thursday 24 April, MOSL will present the key themes arising from stakeholder feedback to Market Performance Framework (MPF) Consultation 5. The event will be held at Make Venues, Broadway House Conference Centre, Tothill St, London between 9.30am–4.30pm. [Find out more on our website.](#)

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