

Minutes of Trade Effluent Issues Committee (TEIC)

Meeting 08

12 June 2018 | 10:30 – 15:30
4th floor, 16-18 Monument Street, London, EC3R 8AJ

Status of the Minutes: Final

MEMBERS PRESENT

Name	Role
Adam Richardson	Chair
Rob Barker	Committee Member (Retailer)
Janet Bulbick	Committee Member (Retailer)
Jamie Mack	Committee Member (Retailer)
Phil Sinclair	Committee Member (Retailer)
Peter Strain	Alternate Committee Member (Retailer)
Matthew Atkin	Committee Member (Wholesaler)
Daniel Bourne	Alternate Committee Member (Wholesaler)
Mark Needham	Committee Member (Wholesaler)
Andy Stringer	Committee Member (Wholesaler)
Evan Joannette (via teleconference)	Affiliated Member (CCWater)
Elliot Bird	Meeting Secretary (MOSL)
Zainab Mohammed	Presenter (MOSL)
Abu Rashid	Presenter (MOSL)

APOLOGIES

Name	Role
Carolina Zenklusen	Committee Member (Retailer)
Patti Quintana	Committee Member (Wholesaler)
Tony Mchattie	Committee Member (Wholesaler)

1. Welcome and Introductions

Purpose: For Information

- 1.1. The Chair welcomed the Committee to its eighth meeting.
- 1.2. The Chair welcomed Daniel Bourne who was attending the meeting as an alternate for Tony Mchattie.
- 1.3. Patti Quintana, Tony Mchattie and Carolina Zenklusen sent their apologies.

2. Minutes and Outstanding Actions

Purpose: For Decision

Minutes

- 2.1. The Committee agreed the accuracy of the minutes of the TEIC meeting 07, subject to 2 amendments identified in the update provided by the Committee Secretariat and members.

Actions

- 2.2. The Committee agreed to close 10 actions (**TEIC07_11, TEIC06_02, TEIC06_06, TEIC07_09, TEIC07_01, TEIC07_02, TEIC07_03, TEIC07_05, TEIC07_12 and TEIC07_13**) from the previous meetings.
- 2.3. MOSL highlighted that the two guidance documents, raised in the previous meeting, had been provided: Trade Effluent charging with no sewerage charges and viewing terminated Discharge Points (DPIDs) through the Market Dataset (MDS) reports.
- 2.4. The Committee Secretariat had also provided notes to Committee Members, as requested, summarising the transactions affected by CPW025 “*Extending TCORR Functionality for Inactive Data Items*” and the Trade Effluent transactions to be considered for future dating.
- 2.5. It was agreed that the actions relating to the Committee Members providing feedback on scenario issues raised would remain open, so that they can be discussed further at a future meeting and to allow for more feedback to be collected from Committee Members.

3. Update on CPW036 “G/02 Form Amendments and G/03 Temporary Consent Form”

Purpose: For Information

- 3.1. Zainab Mohammed (ZM) provided an update on the progress of CPW036 “*G/02 Form Amendments and G/03 Temporary Consent Form*” that was presented at the May Panel meeting. It was highlighted that the Panel only had minor comments on the drafting provided and broadly agreed with the suggested approach recommended by the TEIC.
- 3.2. ZM also confirmed that a full list of hazardous substances had been provided to MOSL by the Trade Effluent Practitioners Network (TEPN) and would be hosted on the MOSL website as documented in the change.
- 3.3. The Panel had requested a legal review of the legal drafting supporting CPW036, given that there may have been potential implications for Wholesalers’ wider environmental obligations. The internal legal review by MOSL confirmed that there would be no conflicts with existing obligations and the change was therefore recommended to the Authority for approval and sent on the 6th June 2018.

- 3.4. Committee Members requested clarity on whether the new form be used prior to the implementation date of CPW036, The Chair responded that this would be an individual Wholesaler's decision.

4. Trade Effluent Operation Performance Standards Update

Purpose: For Information

- 4.1. ZM provided an update on the Operational Performance Standards (OPS) that the TEIC recommended to the Market Performance Committee (MPC) for consideration in their review of the OPS framework.
- 4.2. The MPC was supportive of the proposed standards by the TEIC. One MPC Member highlighted that the standard around sampling would likely involve a large-scale monitoring exercise, given that thousands of samples are taken within a month, but also recognised that it was an important standard that had an obvious impact on customers.
- 4.3. The MPC also highlighted that this would need to be part of the standardisation work of the Operational Performance Standards Working Group (OPSWG), which would be reviewing charging for the OPS and guidance around the OPS terms.
- 4.4. Finally, the MPC thanked the TEIC for their contribution to the OPS review and anticipated that the OPSWG would be reporting to the MPC on the OPS review in summer 2018.

5. A Brief Overview of SVAM

Purpose: For Decision

- 5.1. Following an action raised at the previous meeting, the Committee were provided with a brief overview of Sewerage Volume Adjustment Method (SVAM) to facilitate later discussion on scenarios related to SVAM.
- 5.2. MOSL explained the 3 methods of SVAM calculation: None, SUBTRACT; and DA (Domestic Allowance). The effects of these calculations are reflected in the settlement Disaggregated Reports Parts 1 and 2 (dissag1 and dissag2) Disagg1 reports detail charges for water and sewerage services provided at premises, whilst disagg2 reports outline charges for Trade Effluent services.
- 5.3. SUBTRACT is a method which enables the sewerage volume at a premise to be reduced by the Trade Effluent volume being discharged through the DPID, whether is it metered or measured through a Calculated Discharge. This is utilised so that volumes are not double counted.
- 5.4. Domestic Allowance is a method whereby the allowance, used for domestic purposes and specified by the Wholesaler, takes the place of the sewerage volume at the premises. The allowance is an annualised amount and CMOS apportions it accordingly to reflect the monthly allowance amount.
- 5.5. If None is specified as a DPID's SVAM, the calculations for sewerage volumes and Trade Effluent volumes at a Supply Point are independent and do not affect each other. This is the default method of SVAM calculation when setting up DPIDs in CMOS.
- 5.6. A Committee Member raised concerns around the charging process around DA SVAM calculations with a meter network, specifically were the RTS is not 100%. After investigation, MOSL confirmed to the member that the Sewerage Wholesaler's RTS affects the amount of Domestic Allowance that is allocated at premises, as per CSD 0207 A.7.9.

Scenario 1 - Inability to have a SVAM of SUBTRACT and allowances

- 5.7. Currently, Trade Effluent allowances (Fixed Allowances and Percentage Allowances) are not included in the subtraction of Trade Effluent volume from metered sewerage volume when an SVAM of SUBTRACT is selected at DPIDs.
- 5.8. Committee Members confirmed that because they are aware of this issue (amongst others previously discussed in other scenarios, such as the inability to have Private Trade Effluent meters in meter networks and utilising SUBTRACT on Private Water meters), they do not make use of SVAM of SUBTRACT in recognition of issues with it.
- 5.9. The Committee discussed the existing solutions utilised and the potential to raise a Change Proposal to resolve the issue of not including allowances in subtraction of Trade Effluent volume from sewerage volume. However, it was noted by the Committee that changes to settlement calculations will always be intensive changes, in terms of testing and development, and may have high costs associated with them.
- 5.10. The Committee discussed the possibility of introducing meters for subtraction, dubbing them as 'fixed allowance meters', which would work around this issue. However, one Committee Member highlighted that they had attempted this previously and it led to issues with negative charges etc.
- 5.11. The Committee agreed that the best resolution for this issue was not a Change Proposal but to produce guidance which details the available options already in use to reflect these setups, when best to use each option and the implications of different workarounds. Two Committee Members, Jane Bulbick and Peter Strain, volunteered to draft a guidance note on this for review by the Committee.

ACTION 08_01

Scenario 2 - DA Application on sub-meters & Scenario 3 - SUBTRACT setup issues

- 5.12. An issue was raised by Committee Members that incorrect charges may be being calculated at DPIDs utilising SVAM, either when
 - Domestic Allowance is allocated against meters in meter networks, whether the sub-meter exists at the same premises or a different one; or
 - DPIDs which have an SVAM of SUBTRACT are only allowed to be associated to Private Trade Effluent meters.
- 5.13. Committee Members had difficulty identifying any specific scenarios this issue would apply to, but one Committee Member highlighted that this had been an issue where a Landlord SPID had an associated tenant Sewerage SPID which required and had a Trade Effluent consent. The Committee Member mentioned that they resolved this by the landlord installing a new Private Water meter at the tenant's premises which was then made a sub-meter in a meter network.
- 5.14. The Committee agreed that guidance should be produced, recognising that such guidance should include the potential benefits and issues of setting up these networks in different ways.
- 5.15. Committee Members highlighted in their submissions that meter treatment types need to be considered carefully when selecting SVAMs, because DA requires meters other than Private Trade Effluent meters associated to the DPID to be taken into account in calculations, whilst SUBTRACT can only be used on DPIDs which are only associated to Private TE meters.

- 5.16. Committee Members agreed that this issue could possibly be a good candidate for a training workshop.
- 5.17. A Committee Member raised concerns with existing practices that involved inputting Private Trade Effluent meters as Private Water meters. They felt the practice was misleading as the purpose of a Private Water meter is to measure the water input only and not outputs. However, Committee Members clarified that Private Water meters can also be used to calculate sewerage volumes, but Private Trade Effluent meters cannot.
- 5.18. Committee Members recognised that this scenario was likely heavily linked to, and possibly even the same, as the issue in scenario 1, as this issue would only likely be encountered while attempting to enable Domestic Allowance.
- 5.19. Committee Members agreed that, in line with scenario 1's recommendation, producing guidance would help parties resolve difficult issues. Members agreed that guidance material on this scenario would fit appropriately into the document that will be developed by Peter Strain and Janet Bulbick (Action 08_01). Members also recognised that changes to functionality in CMOS would have subsequent effects on Trading Parties' systems and processes.
- 5.20. Committee Members also raised that workarounds they employ to resolve their issues do not always operate as expected. Currently, there is no way of determining if they will work correctly until the monthly settlement is run and the billing can be observed. Some Members felt this might suggest the need for some form of charging simulation/calculator that can avoid billing issues such as these when making these kinds of amendments.
- 5.21. An action was raised for MOSL to raise the suggestion of being able to see the impacts of data changes on settlement calculations immediately, rather than waiting for scheduled settlement runs, or the execution of more regular settlement runs with the Digital Strategy Committee.

ACTION 08_02

6. Trade Effluent Scenarios

Purpose: For Decision

- 6.1. The Committee reviewed some new scenarios, not related to SVAM, that were not addressed at the previous meeting.

Scenario 4 – Calculated discharge volumes not being submitted by Retailers

- 6.2. A Committee Member highlighted that Retailers are not always providing calculated discharge volumes in line with the submission frequency on the discharge, which could be Monthly, Bi-annually or Never. This has become a historic issue because prior to implementation of WRC055 in October 2017, the Never option did not exist, and Wholesalers had to define a submission frequency which previously may not have been required. WRC055 sought to add in the Never option as there were numerous cases of Trade Effluent discharges were low risk with stable volumes of discharge that did not change substantially over time. An example of this is a calculation based upon an external factor, such as rainfall.
- 6.3. One Committee Member highlighted that this issue had only recently been internally raised with them and they had previously believed that the submission frequency would be annually.

- 6.4. Committee Members highlighted that some customers will have very difficult-to-access meters; they may be part of a large meter network with many sub-meters or some of the meters locations are unknown. Therefore, this may mean that all the information necessary to submit calculated discharge volumes is not easily achievable to obtain.
- 6.5. The Committee agreed that this issue was clearly caused by a lack of knowledge of the process, a lack of initial information being provided by the original submission and subsequently a new frequency being available (Never). The Committee therefore felt that this would fit as part of a training session as discussed previously, given that a suggestion had been made previously for Calculated Discharges' training and that could include changing the submission frequency as part of a data cleanse.

Scenario 5 – Inability to erase certain entities

- 6.6. A Committee Member submitted the issue that certain items in Calculated Discharges, Trade Effluent Volumetric Adjustments or sewerage allowances cannot be erased and also that Calculated Discharge references cannot be reused. This means that if errors are identified in these items on a DPID that cannot be corrected, the DPID cannot be recreated correctly either.
- 6.7. In response to a request for clarity from Committee Members, MOSL confirmed that to terminate a DPID you would need to discontinue all of the DPID's Calculated Discharges, which is only achievable if volume exists up to the point from which you wish to discontinue the Calculated Discharges.
- 6.8. Committee Members noted a concern, discussed at the previous meeting, that calculated discharges' end dates were not visible in the CMOS portal.
- 6.9. MOSL confirmed that Volumetric Adjustments can be amended by adding a new negative adjustment at the same value of the previous incorrect adjustment to effectively cancel it out in settlement. In addition, although you cannot reuse a Calculated Discharge reference, you can create a new very similar reference that incorporates a version number for example.
- 6.10. The Committee agreed that this scenario should be resolved through circulation of guidance and possibly a training session.

Scenario 6 – Cannot have a private TE meter at a SPID and as part of a meter network. Cannot be part of another DPID's meter network in a different SPID.

- 6.11. Committee Members raised an issue that currently Private Trade Effluent meters cannot be part of a meter network. This had become an issue in a number of cases where tenant SPIDs require Trade Effluent consents.
- 6.12. Committee Members recognised that this could be resolved with a change to the system to allow Private Trade Effluent meters to be part of a meter network, but also recognised that this change could have significant consequences given that it would alter the makeup of settlement calculations.
- 6.13. MOSL highlighted that a current workaround exists where the meter can be input as a Private Water meter then removing the meter's sewerage charging. This would be done by amending the Return To Sewer (RTS) attribute of the meter.
- 6.14. Committee Members agreed that this scenario would also benefit from the production of guidance or being explained in a training session.

7. Recap of Scenarios and actions

Purpose: For Decision

- 7.1. The Chair provided a summary of the actions arising from the meeting's previous discussion of scenarios, and the outcome of discussions of scenarios at the previous meeting.

Scenarios – Previous Month

- 7.2. **Scenario 1** – In relation to this scenario, the Committee Secretariat had provided guidance to the Committee for their review before it is circulated more widely.
- 7.3. **Scenario 2** – MOSL circulated guidance on using MDS to view terminated DPIDs and would provide an update following internal review on “view history” functionality in CMOS.
- 7.4. **Scenario 3** – MOSL recognised that this scenario raised a wider question around the potential to future date CMOS transactions, and highlighted only 4 members had responded. Retailers were urged to think of the implications of Wholesalers future dating transaction to them and respond.
- 7.5. **Scenario 4** –The Chair explained that MOSL intended to produce a note reminding parties of their obligations in relation to consolidating SPIDs on a single premise. The note would include the obligations of Retailers in supporting each other in the process where SPIDs on the same premise are not all with the same Retailer.
- 7.6. **Scenario 5** – MOSL confirmed after investigation that DPIDs can be recreated with previously used references at erased DPIDs, which should resolve the issue.
- 7.7. **Scenario 6** – The Committee agreed to pursue a change proposal to allow Sewerage Wholesalers to create meter networks.
- 7.8. **Scenarios 7 & 8** – These scenarios were reviewed in the earlier agenda item at the June meeting to look at issues relating to SVAM.

8. Any Other Business (AOB)

Purpose: For Information

- 8.1. Committee Members raised that they had been considering whether there was a need to introduce an SLA for Retailers, in relation to the provision of customer consent applications to Wholesalers.
- 8.2. Committee Members explained that, currently Wholesalers are not receiving consents raised by customers through their Retailer. This then has a negative impact on the customer services Wholesalers provide, but there is currently no Service Level Agreement (SLA) on Retailers to ensure this happens within a reasonable time.
- 8.3. The Committee agreed that this should be raised with the MPC, recognising that the MPC's current timetable means that it is not likely to have time to review this as part of its current review of the OPS terms.
- 8.4. The Committee also agreed that the Auditor would be able to provide insight on the impact of the Trade Effluent Issues Committee so far, given that they identified it as a key issue previously.
- 8.5. A Committee Member asked how other Wholesalers were meeting their SLAs on updating private meter exchanges. Their Wholesaler raised the issue as customers were informing Retailers of meter

exchanges months after they have taken place. The Wholesaler submits the exchange details but incurs performance charges as the SLA requires this information to be submitted within 5 days of the event.

- 8.6. Committee Members also highlighted that Wholesalers cannot exchange meter information if there is a DPID linked to the meter, so they need to disassociate the meters on behalf of the Retailer and there will be a large amount of information exchange to support transactions. This further complicates the process and has made 5-day SLA difficult to meet. However, the requirement to disassociate a meter from a DPID may be a defect as CSD 0104 states that if an association exists between a meter being exchanged and a DPID, then it shall continue to exist following the meter exchange.
- 8.7. MOSL confirmed this had been discussed previously at the Wholesalers Interface Group but that the numbers involved were very small. It was noted that Wholesalers need to have the process in place as per B12 (and B10) for customers to provide details directly to them and not to rely on the Retailer. A Member highlighted that their organisation had developed a form to help this process that had space for a photo of the meter to aid in collecting the required information.
- 8.8. The Committee agreed that this may be addressed by the RWG who are addressing bilaterals in a sub-group and starting with Part B: Metering processes. MOSL agreed to feedback updates on those discussions.
- 8.9. The Chair thanked the Committee for their contribution and highlighted that this would be his final meeting as Chair of the TEIC.
- 8.10. There was no further business and the Chair closed the meeting.

Actions:

- ACTION 08_01** Committee Member volunteers to develop guidance relating to SVAM issues with Trade Effluent and Domestic Allowances (DA) and SUBTRACT calculations.
- ACTION 08_02** Discuss the possibility of charge calculation simulations or more regular settlement with the Digital Strategy Committee.

The next Committee meeting is scheduled for: **10th July 2018, 10:30 – 15:30, at:**

MOSL Offices
16-18 Monument Street
London
EC3R 8AJ

The nearest tube stations are Monument, Bank and London Bridge.