

# Minutes of Trade Effluent Issues Committee (TEIC)

## Meeting 06

17 April 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
Matthew Atkin	Committee Member (Wholesaler)
Rob Barker	Committee Member (Retailer)
Janet Bulbick	Committee Member (Retailer)
Patty Quintana	Committee Member (Wholesaler)
Phil Sinclair	Committee Member (Retailer)
Evan Joannette	Affiliated Member (CCWater)
Andy Stringer	Committee Member (Wholesaler)
Elliot Bird	Meeting Secretary (MOSL)
Abu Rashid	Presenter (MOSL)
Chris Arnold	Presenter (MOSL)
Dan Rowe	Presenter (Yorkshire Water)

### APOLOGIES

Name	Role
Tony Mchattie	Committee Member (Wholesaler)
Mark Needham	Committee Member (Wholesaler)
Carolina Zenklusen	Committee Member (Retailer)

## 1. Welcome and Introductions

### Purpose: For Information

- 1.1. The Chair welcomed the Committee to the meeting.
- 1.2. Tony Mchattie, Carolina Zenklusen and Mark Needham sent their apologies.

## 2. Minutes and Outstanding Actions

### Purpose: For Decision

#### 2.1. Minutes

- 2.2. The Committee agreed the accuracy of the minutes of the TEIC meeting 05, based on the update provided by the Committee Secretariat.

#### 2.3. Actions

- 2.4. The Committee agreed to close 3 actions (**TEIC05\_04**, **TEIC05\_05** and **TEIC05\_06**) from the previous meetings.
- 2.5. The Committee agreed it would leave action **TEIC03\_08** open in order to allow more time for scenarios to be submitted, from both inside and outside the Committee, for review. Committee Members also agreed to communicate the request to other Trade Effluent (TE) industry groups outside of the Committee, as well as raising it at the User Forum.
- 2.6. MOSL to confirm to TEIC members the code drafting to be included in the change proposal CPW036 *Trade Effluent Forms* to identify the list of hazardous substances.

**ACTION 06\_01**

#### 2.7. Change Proposal Log

- 2.8. Committee Members highlighted concerns that erroneous data affecting calculation of Primary charges associated with Trade Effluent may not be corrected within the 16-month settlement window, which mean that accounts cannot be resolved within this window either.
- 2.9. An action was raised for TEIC Members to highlight data items that need updating via scenarios.

**ACTION 06\_02**

- 2.10. Additionally, an action was raised for MOSL to confirm how these data item discrepancies can be remedied where they have not been rectified by the Final Reconciliation Settlement Run.

**ACTION 06\_03**

## 3. Proposed changes to the G/02 and G/03 Forms

### Purpose: For Decision

- 3.1. The Committee discussed the proposed changes to the G/02 form and the proposed introduction of the G/03 form, including the responses received in an industry consultation on both changes.

- 3.2. The Committee agreed that the two changes should be progressed as a single Change Proposal, given that they are both dependent on each other. The Committee and the Proposers for the Change Proposals also agreed that PQ would be the Proposer for the combined Change Proposal.

#### **G/02 Form Trade Effluent Discharge Application**

- 3.3. A number of clarificatory amendments were agreed by the committee as a result of the Committee's review of the consultation responses.
- 3.4. The Committee noted comments that it was important any suggested additions were carefully considered, as the intention of the change is to make the form less complex so it can be understood by average customers.
- 3.5. The Committee agreed that, alongside the forms and changes, there needed to be the provision of guidance for those who would fill in the forms. The described guidance would be developed by the Committee as part of its guidance workstream, rather than part of the Change Proposal. The Committee suggested a number of items this could include, such as:
- Guide on material volumes of substances;
  - Examples of a drainage plan; and
  - Highlights of differences across different Wholesalers approaches to Trade Effluent Consent services.
- 3.6. It was agreed that changes would not be made to the pH field within the form as some consultation responses suggested, to ensure that the form remained as simple as possible, and instead this could be covered in the proposed guidance.
- 3.7. The Committee also did not feel that it was necessary to provide fields for x and y coordinates as some responses suggested, as this information can be provided in a description field which can be highlighted in guidance. This allows a description of the location to also be provided if the coordinates are not known.
- 3.8. The Committee also agreed to additions to the form to indicate reasons why the Supply Point (SPID) information has not been completed, if the customer has not provided it, and inform the Wholesaler to create a SPID.

#### **G/03 Form Temporary Trade Effluent Discharge Application**

- 3.9. The Committee considered whether there should be a disclaimer included on the form that highlights the Wholesaler may require further information than is on the form and may request this following its submission. However, on review the Committee Members agreed that the existing warnings in the form would be sufficient.
- 3.10. It was also agreed that there needed to be a comment within the form that highlights different Wholesalers may provide different Trade Effluent consents, particularly regarding providing multi-site consents. This comment should inform the customer that they need to contact their Retailer to determine what services are available prior to filling out the form. The Committee felt this needed to be at the start of the form and in the type of application section.

- 3.11. Respondents highlighted that the form did not provide enough space for Ground Water Remediation, but the Committee felt that this should not differ from any other form of discharge and should be covered by Section 7 of the form "*Trade Effluent Description*".
- 3.12. Respondents had also suggested that a clause should be included in the form to indicate that a Wholesaler may need to install a meter if there is a large volume to discharge, but the Committee did not agree this was necessary as it should already be part of the Trade Effluent Consent. However, the Committee agreed this should be reflected in the proposed guidance notes.
- 3.13. A respondent had provided a specific example of a charging approach that was unique to themselves which they did not believe was supported by the proposed form. However, the Committee reviewed the described charging approach and believed that the current charging arrangements would cover the approach taken by the respondent. The Committee Secretariat took an action to communicate with the respondent to provide this feedback.

#### **ACTION 06\_04**

- 3.14. When considering the content of the Recommendation Report, the Committee agreed that the reduction in the number of TE consents following market opening should be highlighted in the rationale of the change. As part of this the Committee Secretariat should reference the estimated figures provided by TEIC Members at a previous meeting. It also agreed there should be an inclusion of a summary of the proceedings of the current meeting.
- 3.15. A Committee Member suggested that it would be useful to highlight in the Recommendation Report that the form is objectively less complex than the previous form, since it is shorter, has fewer questions and simpler wording of requirements.
- 3.16. The Committee unanimously agreed to the proposed Recommendation Report and documentation, subject to the resolution of the list of hazardous substances that was discussed earlier during the agenda item on the Committee's actions (Section 2.7).
- 3.17. The Proposer of the changes agreed to provide the Committee Secretariat with the updated legal drafting following the discussions at the meeting.

#### **ACTION 06\_05**

## 4. Jargon Buster

### **Purpose: For Decision**

- 4.1. As part of a previous action, the Committee were asked to provide the Committee Secretariat with a list of alternate terms for key Trade Effluent terms and preferred definitions to contribute to a Jargon Buster to aid the understanding of Non-household customers.
- 4.2. The Committee confirmed that the principle of the Jargon Buster should be to provide alternative easy-to-understand definitions, rather than the Market Code definitions. However, it also agreed that where a Market Code definition did exist, there should be some form of indication on the term in the Jargon Buster such as a flag or an inclusion in its further information, perhaps providing the section of the document where it is defined.

- 4.3. Committee Members also provided a number of additional terms which should be included on the list. These included multi-site consents, eligibility, market tradability, landlord and consented or charging Chemical Oxygen Demand (COD).
- 4.4. It was highlighted that previously customers had not always been clear on what form to use for their own specific request and that it could potentially be helpful to include this in the guidance piece. It was then agreed that the Jargon Buster could provide definitions for the different form names, as they could be considered jargon for those without Trade Effluent knowledge.
- 4.5. A Committee Member also highlighted that it was important the Jargon Buster made clear the difference between charging levels and consented levels, as these were not always the same which is a common misconception for customers.
- 4.6. There was also an agreement that when there were two terms that seemed very similar, it would be useful to indicate somewhere what the difference between those two terms is, such as the case with meter networks and Wholesale meter networks.
- 4.7. Committee Members took an action to send change-marked additions/amendments to the Jargon Buster to MOSL.

**ACTION 06\_06**

## 5. Review of Scenarios

### **Purpose: For Discussion**

- 5.1. As part of a previous action, Committee Members were asked to provide the Committee Secretariat with specific Trade Effluent scenarios that they or their organisation are having difficulties resolving. The Committee discussed a sample of the provided scenarios to attempt to understand these issues.
- 5.2. Discussion among the Committee Members highlighted that different organisations may all have different approaches to similar issues. This indicated to the Committee that it would be beneficial to understand what methods are being used so that a best practice method could be developed. If the solutions can be reviewed side by side then the solution that is most pragmatic can be easily identified.
- 5.3. In addition to this, a number of scenarios were provided that related to data items or functionality of CMOSs. In these cases, the Committee agreed that it would feedback system requirements for a solution to the problem in its review.
- 5.4. Committee Members took an action to review the scenarios discussed at the meeting and provide feedback on their organisations' solutions and examples.

**ACTION 06\_07**

- 5.5. A specific issue was raised within a scenario that currently CMOS is unable to future date items, and therefore Trading Parties have to store TE consents until the exact day they become active. This limits the ability of Trading Parties to plan ahead and work efficiently. The Committee noted this and agreed that it would be useful to consider this in the future, possibly as a code change. The Committee Secretariat agreed to feedback this suggestion to MOSL following the meeting.
- 5.6. The Committee Secretariat agreed to send out communications to members about feedback for scenarios, specifically asking for examples, impacts and workarounds.

## 6. Any Other Business (AOB)

### **Purpose: For Information**

- 6.1. A Committee Member queried how potential Operational Performance Standards (OPS) suggestions from the TEIC might be implemented into the charging schemes and whether the charges would be backdated. MOSL confirmed that this would be discussed by the MPC who would identify rationale for however it decides to implement the given standard.
- 6.2. There was no further business and the Chair closed the meeting.

### Actions:

- ACTION 06\_01** MOSL to confirm to TEIC members the code drafting to be included in the Change Proposal to G/02 and G/03 forms to identify the list of hazardous substances.
- ACTION 06\_02** TEIC Members to highlight data items that need updating via scenarios.
- ACTION 06\_03** MOSL to confirm how data item discrepancies can be remedied where they have not been rectified by the Final Reconciliation Settlement Run.
- ACTION 06\_04** Committee Secretariat to communicate with consultation respondent confirming the example of their charging approach is covered in the new G/03 form.
- ACTION 06\_05** PQ to submit formal change proposal consistent with recommendations of the TEIC.
- ACTION 06\_06** TEIC Members to send change-marked additions/amendments to the jargon buster to MOSL.
- ACTION 06\_07** Committee Members to review scenarios discussed at the meeting and provide feedback on their organisations solutions and examples.
- ACTION 06\_08** Sending out communications to members about feedback for scenarios, specifically asking for examples, impacts and workarounds.

The next Committee meeting is scheduled for: **15<sup>th</sup> May 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.**