

Minutes of Trade Effluent Issues Committee (TEIC)

Meeting 07

15 May 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)
Peter Strain	Alternate Committee Member (Retailer)
Evan Joannette	Affiliated Member (CCWater)
Andy Stringer	Committee Member (Wholesaler)
Mark Needham	Committee Member (Wholesaler)
Elliot Bird	Meeting Secretary (MOSL)
Abu Rashid	Presenter (MOSL)
Zainab Mohammed	Presenter (MOSL)

APOLOGIES

Name	Role
Phil Sinclair	Committee Member (Retailer)
Tony McHattie	Committee Member (Wholesaler)
Carolina Zenklusen	Committee Member (Retailer)

1. Welcome and Introductions

Purpose: For Information

- 1.1. The Chair welcomed the Committee to its seventh meeting.
- 1.2. The Chair welcomed Peter Strain who was acting as an alternate for Carolina Zenklusen who sent her apologies.
- 1.3. Tony Mchattie, Carolina Zenklusen and Phil Sinclair 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 06, subject to 3 amendments identified in the update provided by the Committee Secretariat and members.

Actions

- 2.2. The Committee agreed to close 7 actions (**TEIC06_04, TEIC06_05, TEIC06_01, TEIC06_07, TEIC01_07, TEIC03_02** and **TEIC 06_08**) from the previous meetings.
- 2.3. The Committee also agreed to review the action **TEIC06_02** and agreed a deadline of the June 2018 Committee meeting.
- 2.4. An update was provided on action **TEIC05_02** CCWater are meeting Ofwat this month and will ask if the Open Water website can be used to host the jargon buster.
- 2.5. The Committee Secretariat also highlighted that the jargon buster had not been updated following the May meeting (**TEIC06_06**), some members advised they were unable to access it on SharePoint, so it was agreed that it would be circulated via email and Members to update prior to the next meeting.
- 2.6. The Committee agreed to continue to feedback specific TE scenarios that Committee Members are having difficulty in addressing, as part of the existing action **TEIC03_08**, by 25th May.

3. Trade Effluent Scenarios

Purpose: For Decision

- 3.1. The Committee discussed a number of Trade Effluent Issue scenarios, that were submitted to the Committee Secretariat by Committee Members prior to the meeting. The Committee sought to determine the following:
 1. How widespread the issue was;
 2. The Impacts of the issue;
 3. The workaround or solutions that should be used to address the issue; and
 4. What action should be taken by the Committee going forward.

Scenario 1 - Meter-DPID Association with no Sewerage Billing

- 3.2. It was highlighted that a significant number of enquiries have been raised by Retailers when Trade Effluent meters are set to a Sewerage Volume Adjustment Method (SVAM) to account for DA (Domestic Allowance) and the Domestic Allowance value is set to zero. Retailers are confused because they are not aware that SVAM accounts can be set up with a DA value of zero, or why they would be.
- 3.3. The Committee confirmed their agreement with MOSL's suggested approach to provide an education piece to Retailers to inform them how the DA and SVAM operate together in the case of a Trade Effluent meter including where it is valid for DA to be zero.
- 3.4. The Committee agreed that PQ should set out some examples of DA to the Committee Secretariat, who would collate a note to be circulated around the Committee for review.

ACTION 07_01

Scenario 2 - Terminated DPIDs and Discontinued Calculated Discharges

- 3.5. A Committee Member raised an issue that when a Discharge Point (DPID) is deregistered they are no longer able to search for it or view its details. Their suggestion was that instead, the DPID should remain visible and show an active from and active to date in the same way as meters are shown.
- 3.6. In addition, if a calculated discharge is discontinued by the Sewerage Wholesaler it still appears as if it was active in CMOS. The Committee Members suggested that the calculated discharge section should have an effective to date column similar to how meters are shown for ease of use.
- 3.7. MOSL also highlighted that terminated DPIDs can be viewed through both the Market Dataset (MDS) reports and the Business Transaction Dossier (BTD). However, Committee Members responded that users have reported difficulties interpreting the BTD historically, as well as the MDS reports. MOSL agreed to raise an action to provide guidance on the MDS reports in response to this.

ACTION 07_02

- 3.8. MOSL informed the Committee that there was currently a Change Proposal awaiting Authority approval (CPW025 "Extending TCORR functionality for inactive data items") that would provide greater functionality to a number of correction transactions (TCORRs) so that they can be actioned on deregistered SPIDs. The Committee noted this and requested that an action be raised for a list of transactions affected by CPW025, so that it can understand whether this Change Proposal will sufficiently address this issue.

ACTION 07_03

- 3.9. The Committee noted that it would be beneficial to provide a training session or further briefing on how calculated discharges work.
- 3.10. MOSL confirmed that the "view history" functionality on CMOS had been reviewed and a number of possible improvements identified. In order to prioritise these regarding DPIDs and Calculated Discharges, Committee Members agreed to provide information to MOSL on how much of their Trading Party's portfolio was affected by this issue and the estimated effort required to perform a workaround.

ACTION 07_04

Scenario 3 - Future Dating of Trade Effluent Consents

- 3.11. A Committee Member raised an issue with submitting Trade Effluent consents when a discharge is not planned to begin immediately after the consent is issued. Currently, Service Level Agreements (SLAs) mean that the consent has to be input into CMOS 2 days following its issue, regardless of when the discharge begins. This means that a number of consents are being input into the system with a zero-discharge amount until the agreed date and incurring a standing service charge from Wholesalers before it comes into use.
- 3.12. This was raised as a particular issue in developer services where customers apply for the consent in advance in preparation for when the discharge will occur during construction work or other similar activities, and there is no opportunity to delay providing the consent. In addition, there is also an SLA to provide a consent within 60 days of a customer's request. Therefore, the only alternative is for Wholesalers to create a queue of consents to be input into CMOS and update them at the relevant date, although this introduces opportunities for errors to be made and for delays in the future.
- 3.13. The Committee Member suggested that a Code Change Proposal be raised in order to allow Trade Effluent Consents to be submitted in advance.
- 3.14. MOSL noted this suggestion and highlighted to the Committee that this change could potentially have a much larger scope than just Trade Effluent. Currently only a registration transfer can be future dated, if there is a possibility for future dating this transaction it would make sense to analyse other transactions for the same change in functionality. The Committee agreed that there should be a specific list of transactions that are valid to being submitted in advance. An action was raised for MOSL to circulate a list of Trade Effluent transactions and the Committee would comment on which it felt could be validly submitted in advance.

ACTION 07_05 and 07_06

- 3.15. In addition, the Committee agreed to provide information on how many transactions are currently queued in this way, and how old on average the consents being queued are.

ACTION 07_07

- 3.16. It was also highlighted that a change to allow future dating would have a positive effect on customer service, as consents can still be provided in advance but the possibility of missing SLAs would be reduced. In addition, Committee Members also felt that it would assist Wholesalers in meeting the SLAs which will help understand Wholesalers' performance levels more accurately.
- 3.17. It was suggested that an alternative solution might be to revise the SLA requirement to something that is more appropriate given the issues described, such as only requiring the Trade Effluent Consent to be submitted into CMOS a number of days prior to the first planned discharge. Alternatively, the SLA could be revised to require an 80-90% performance requirement, given the understanding that some of these deadlines cannot be met in specific circumstances.
- 3.18. Committee Members highlighted that addressing the issue with a new tariff (with a zero charge) would duplicate the exercise of inputting data as the tariff would then need to be changed once the discharge had commenced.

Scenario 4 – Single premises as multiple SPIDs

- 3.19. Committee Members highlighted that currently there are instances where a single eligible premise discharging Trade Effluent has multiple water SPIDs and meters associated with each SPID. The DPID can only be linked to one SPID and thus settlement reconciliation is inaccurate in cases where multiple SPIDs (with meters) exist for a single premise. As per the market terms, these SPIDs should be combined into a single SPID by the Water Wholesaler with multiple meters, but currently requests of this nature have mostly been unsuccessful.
- 3.20. The Committee also recognised that this affected the whole market and was due to difficulties identifying customers or premises in the initial data upload prior to Go-Live.
- 3.21. A Committee Member mentioned a potential disincentive issue with combining multiple meters into a single SPID, because a number of Wholesalers have standing charges per SPID so to make this form of correction would reduce their income.
- 3.22. In addition, it was highlighted by another Committee Member that even in the case where the Wholesaler does agree to combine the SPIDs, there may still be issues if those SPIDs are not all allocated to the same Retailer. In this instance, there is no process to allocate the combined SPID to any of the pre-existing Retailers.
- 3.23. Committee Members highlighted that there is an investigation identifying premises in place, that is led by Scottish Water and paid for by Market Performance Standards charges which could be a potential option for consideration in England.
- 3.24. The Committee confirmed that it agreed with MOSL's proposed approach to issue guidance to Trading Parties on the Market Terms and disputes processes if they are faced with this issue and cannot agree on a resolution.
- 3.25. The Committee agreed that any guidance produced on this topic should inform Wholesalers of the implications of merging SPIDs to support Trade Effluent and the market requirement to do so. It also agreed scenarios should be presented to further demonstrate the importance of the rules.
- 3.26. In addition, the Committee felt it would be beneficial to engage with Wholesalers to understand how they are addressing this issue. An action was raised for the Committee to feed back their experiences of practical issues faced when attempting to resolve multi-SPID sites.

ACTION 07_08

Scenario 5 – Moving Discharge Points

- 3.27. Committee Members raised that currently it is not possible in CMOS to move a discharge point between SPIDs and currently the only solution is to erase and recreate the DPID. This raises issues because Wholesalers typically name DPIDs after the Trade Effluent Consent's reference. CMOS rejects Discharge Point identifiers that have been previously used for DPIDs that have been erased; so, it is impossible to recreate the DPID with the same reference that appears on the consent.
- 3.28. It was confirmed that being able to create a new DPID with the same identifier as the previous one would resolve the issue of not being able to move Discharge Points. MOSL agreed to review the code requirements for DPIDs and determine the rationale behind the current restrictions.

ACTION 07_09

- 3.29. Committee Members suggested that a Change Proposal could be raised to allow DPIDs to be moved. However, MOSL informed them that it might be an expensive and difficult change, given that creating new transactions is normally difficult and the transaction is likely to be more complicated than the equivalent move meter transaction.
- 3.30. In response to this feedback, the Committee agreed to provide information to support a cost-benefit analysis for a Change Proposal, such as the likely number of DPIDs affected and the estimated effort required to complete a DPID recreation.

ACTION 07_10

Scenario 6 – Inability to Create Meter Networks:

- 3.31. Currently it is impossible for Sewerage Wholesalers to create meter networks; the only current process is for them to communicate with the Water Wholesaler and ask them to build the meter network. However, currently they are facing issues as typically Water Wholesalers do not prioritise these activities, as they have no impact on their CMOS data, and in instances where they do they are often faced with errors and confusion.
- 3.32. Other Committee Members also highlighted that the Return to Sewer (RTS) attribute and calculated discharge calculation types for water meters were alternatives as a workaround, but also highlighted that when these workarounds are used the data may often be inaccurate. This inaccuracy would directly make customer bills less accurate, and therefore this change would have a quantifiable customer benefit.
- 3.33. The Committee also agreed that further controls over such functionality, to prevent Wholesalers from removing links other Wholesalers have created, would be necessary.
- 3.34. The Committee agreed that it would look to raise a Change Proposal as suggested, but that it would also aim to have interim guidance published to explain how to work around the issue until the change is implemented.
- 3.35. The Committee also noted that a change of this kind would require ongoing communication between the two Wholesalers to ensure any updates required in the network are reflected.

Scenario 7 - Meter Treatment Types

- 3.36. The TEIC discussed how there are instances in the market where Private Trade Effluent meters are registered on CMOS as Private Water meters, in order to utilise CMOS calculation methods which are not allowed against Private Trade Effluent meters.
- 3.37. The TEIC noted that the Wholesaler may wish to change the categorisation of the meter in cases where changes to premises require Domestic Allowance to be applied. This is because SVAM cannot be applied against Private Trade Effluent meters. However, Trading Parties are currently unable to change a meter type between Private Water and Private Trade Effluent
- 3.38. The current workaround is to erase the meter and install a new one, but this requires substantial work in recreating the previous meter's read history and attributes.
- 3.39. There could potentially be a change to SVAM to resolve the original issue, and therefore the required workaround. Members highlighted that, if a change is made to SVAM calculation methodology, historical data where Private Trade Effluent meters were installed as Private Water meters would still remain and be inaccurate.
- 3.40. The Committee agreed that any changes implemented should support the functionality as expected, i.e. Trade Effluent Meters being used for Trade Effluent and not support the use of existing workarounds that are not reflective of the actual situation. Therefore, a change to amend the functionality of Private Trade Effluent meters seemed most appropriate.
- 3.41. Committee Members highlighted that there may be occasions where the use of a meter on a premise needs to be reviewed and changed, which is not currently possible.
- 3.42. The Committee recognised the issues with the SVAM in relation to this, and recognised that a number of later scenarios had similar issues caused by the SVAM. Therefore, the Committee agreed to review the issue in future, alongside the other similar issues, to allow for a more holistic view.

ACTION 07_11

Scenario 8 - Additional Field for metered volume:

- 3.43. Committee Members suggested that the meter types (Private Water and Private Trade Effluent) need an additional field to capture what the meter is measuring, whether it is water supply or Trade Effluent. This is because currently, meters are being chosen based on the required site charging calculation, rather than reflecting their use as discussed in the previous scenario.
- 3.44. The Committee noted that this was another issue created because of wider issues with the SVAM, and therefore agreed to re-address this alongside Scenario 7 at a later meeting.

4. Any Other Business (AOB)

- 4.1. An action was raised for the Committee Secretariat to circulate a list of the other scenarios that will be reviewed at the next Committee meeting.

ACTION 07_12

- 4.2. An action was also raised for Committee Members to provide their comments on the recommendation paper on the Operational Performance Standards (OPS) that is being taken to the Market Performance Committee (MPC) before the end of the week.

4.3. There was no further business and the Chair closed the meeting.

Actions:

ACTION 07_01 PQ to raise examples of DA to the Committee Secretariat to be collated into a note and circulated.

ACTION 07_02 MOSL to produce guidance on MDS reports for Trading Parties.

ACTION 07_03 MOSL to circulate a list of transactions that are covered by Change Proposal CPW025.

ACTION 07_04 Committee Members to provide feedback to MOSL on the number of terminated DPIDs they require visibility of and the estimated time it takes to operate the existing work around.

ACTION 07_05 MOSL to circulate a list of Trade Effluent transactions to Committee Members.

ACTION 07_06 Committee Members to provide feedback on list of transactions to indicate which would benefit from future dating functionality.

ACTION 07_07 Committee Members to review their number of currently queued Trade Effluent Consents that will begin at a future date, and the average length of time these consents remain in a queue.

ACTION 07_08 Committee Members to feedback practical issues of consolidating multi-SPID sites.

ACTION 07_09 MOSL to review existing code restriction on creating DPIDs with identical reference numbers to previously deleted DPIDs.

ACTION 07_10 Committee Members to provide feedback on the estimated number of DPIDs that require moving currently, and the estimated effort for erasing and remaking a SPID.

ACTION 07_11 MOSL and the Committee to review the SVAM holistically and issues relating to it at the next Committee meeting.

ACTION 07_12 Committee Secretariat to circulate a list of scenarios being covered at the following Committee meeting.

ACTION 07_13 Committee Members to provide comments on the recommendation paper on Operational Performance Standards before the end of the week.

The next Committee meeting is scheduled for: **12th June 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.