

## Trade Effluent Issues Committee Meeting 03 - Minutes

9<sup>th</sup> January 2018 | 10:30 – 16:00  
4th floor, 16-18 Monument Street, London, EC3R 8AJ

### MEMBERS PRESENT

Name	Role
Natasha Sinnett	Chair (MOSL)
Zainab Mohammed	Water Operations Lead (MOSL)
Chris Arnold	Market Analyst (MOSL)
Stephen Winnie	MOSL Representative pm
Matthew Atkin	Wholesaler
Andrew Stringer	Wholesaler
Mark Needham	Wholesaler
Janet Bulbick	Retailer
Phil Sinclair	Retailer
Tony McHattie	Wholesaler
Ana Millan-Villaneda	CCWater

### APOLOGIES

Name	Party
Ian Myers	Environment Agency
Evan Joannette	CCWater
Patricia Quintana	Wholesaler
Carolina Zenklusen	Retailer
Jamie Mack	Retailer
Jenny Mclean	Retailer

## OPEN SESSION

### 1. Welcomes and Introductions

- 1.1 The Chair began the meeting by welcoming the Committee.
- 1.2 The Chair informed the Committee that the meeting was not quorate. As a result, the Committee were informed that the market auditor response and G/02 form change proposal discussions will be considered at the next Trade Effluent Issues Committee (TEIC) meeting as opposed to this meeting.
- 1.3 Committee members were informed that any items that appear as for decision on the agenda will be for discussion and relevant decisions will be made following the meeting.
- 1.4 PwC have requested the Committee add an additional paragraph to the TEIC Terms of Reference (ToR). In effect, the additional section seeks to limit the items that the auditor will discuss to matters relating to the market audit. MOSL agreed to redraft the ToR to include this provision and recirculate the amended ToR to members.

TEIC03\_01

### 2. Minutes and Actions Update

- 2.1 The presenter gave an update on the status of the actions for the Committee. The following actions were closed;
  - *TEIC01\_03* – Circulate a diagram detailing the formal groups across the market and the deadlines for paper submissions from each group.
  - *TEIC01\_04* – Inform TEIC members of the cut off dates for each CMOS release.
  - *TEIC01\_09* – Determine the number of temporary consents that they currently receive and the percentage of these that meet the ten-day requirement.
  - *TEIC01\_11* – MOSL to clarify if short term consents were excluded from the market
  - *TEIC01\_12* – Circulate example of support form/guidance document for short term consents
  - *TEIC02\_01* - MOSL agreed to update the framework and approach document considering feedback from members and the Panel and populate the remaining sections before circulating to TEIC members again for further comment.
  - *TEIC02\_04* - MOSL agreed to create a list of all trade effluent related SLAs for the Committee to consider at the next TEIC meeting.
- 2.2 Members **NOTED** that the approach on the following actions would be discussed later in the meeting;
  - *TEIC01\_07* – Create standard industry wide reference for Trade Effluent Terminology

- *TEIC02\_02* - MOSL agreed to summarise the different themes from issues grouped in the learning category and create a draft schedule of training sessions for consideration by the Committee.

2.3 Committee **AGREED** to publish minutes for meeting 02 with the following amendments

- The addition of a post meeting note in Section 5.3 regarding to changes to the G02 Form clarifies that the bullet related to temporary consents is not required as a change proposal relating specifically to temporary consents has subsequently been raised.

### 3. Prioritised Consolidated Issues

3.1 The Chair informed the Committee that the issues log had been consolidated in response to feedback received at the previous meeting and explained to the Committee that the purpose of this session was to agree that the suggested banding of issues was appropriate.

3.2 The complete issues log which was circulated prior to the meeting was discussed by the Committee. The suggested categories are given below,

- Consents
- Data
- CMOS
- Training
- Operations
- Charging

3.3 Prior to the meeting the Committee was sent an updated approach and framework document. A summary of the changes is given below;

- Risk matrices updated and completed;
- A section on topics that were in and out of scope of the Committee was added;
- Removal of diagrams that would not be used;
- Changes to wording to clarify Market Codes alignment or non household customer focus;
- Minor typographical amendments to the document.

Committee members were informed that if they wanted to make any amendments to the approach and framework document then they should give feedback before Panel paper day for the January Panel meeting which is 16<sup>th</sup> January 2018

### 4. Training Action Plan

4.1 Two main areas for training and guidance were considered by the Committee, these were;

- An agreed common guideline for non-household customers on what Trade Effluent is and how to apply for consents.
  - Guidance document for Retailers on how to complete the G/02 form.
- 4.2 Members informed the group that a number of Wholesalers have already developed guidance documents for the completion of the G/02, this means the exercise would simply be to create a consolidated market wide version from the guidance documents that currently exist. It was recommended that the consistent guidance could be published on the Market Operator website.
- 4.3 Members discussed the use of the Open Water website. The Chair explained that it was CCWater's suggestion that it would be useful and beneficial to host these market agreed guidelines on the Open Water website. Committee members expressed the view that it would be very useful to have a hosted website that Trading Parties could direct customers to for further guidance and information.
- 4.4 Committee members also noted that there is potentially work needed through communications to allow parties to consistently use or direct customers to the OpenWater website. The suggestion that a communication include trading parties, DEFRA, EA, OFWAT and CCW to allow for signposting in documents or local websites.
- 4.5 Committee members discussed the variation in services offered by different Retailers. The Committee reviewed the Open Water website and suggested that it would be useful to have a page that gave a list of Retailers with colour coding from which customers could deduce services they offered e.g. short-term Trade Effluent, long term Trade Effluent etc.
- 4.6 Committee members noted that the current arrangement whereby NHH customers ring Retailers directly to ascertain the services that they provide is not ideal and could be improved.
- 4.7 The Committee discussed Retailer business practice. There was a suggestion that there could be improvements by identifying the retailers who offer TE on the OpenWater website.
- 4.8 A Retailer member of the Committee explained that variations in the way in which different Wholesalers charge for Trade Effluent services can cause Retailers difficulties from a bidding or quotation perspective and noted the risks associated with this process can be exacerbated by poor set up of Trade Effluent sites within CMOS.
- 4.9 Committee members noted that a number of Trading Parties are still in the process of learning and developing the skills needed to effectively serve customers on more fundamental topics and as a result are not prioritising Trade Effluent issues.
- 4.10 Committee members began work on developing a flowchart/process diagram that could be used to help NHH customers work out the most appropriate groups to contact when determining whether they are required to have Trade Effluent services. The key points from these discussions are below;

- CCwater have previously mentioned that they would like to get customer feedback on any documentation produced before publication.
- Members highlighted the importance of the flow chart produced by the Committee to be printable and available on a readily accessible website.
- Members highlighted that this could be part of a wider piece of work seeking to address areas that cause confusion amongst customers e.g. leakage, water efficiency etc.
- Additional services offered by Retailers were discussed. A Retailer member informed the Committee that they list the additional services provided to customers at the end of bills, if other Retailers also list these services these could be included in this process diagram.
- Members discussed how to raise awareness to Trading Parties of this flow chart, the forums suggested were;
  - Direct Communications with all Wholesalers, Retailers, CCWater and Ofwat
  - Circulation on the MOSL monthly newsletter
  - Via Trading Party websites.
- The logistics of developing the document were discussed, key steps suggested were;
  - A Committee member and the chair agreed to create document and circulate to TEIC members.

**TEIC03\_02**

- MOSL to liaise with Ofwat to determine if the Open Water website could be used to host the flow chart developed.

**TEIC03\_03**

- Develop a prototype document and send to CCWater to get feedback from business customers before finalising

**TEIC03\_04**

4.11 Two members of the Committee agreed to document and compile the current guidance documents across the market for completion of the G/02 Form and report back to the TEIC with a consolidated market wide draft for discussion at the next TEIC meeting.

**TEIC03\_05**

4.12 TEIC members discussed the importance of shared terminology when discussing TE issues. A member suggested the creation of a 'jargon buster' document so that common terminology could be developed. MOSL agreed to circulate a draft list to members for feedback and discussion at the next TEIC meeting.

**TEIC03\_06**

## 5. Part G – SLA for OPS Standard

5.1 The presenter informed the Committee that the objective of this session is to consider SLAs in part G of the Operational terms and come to a determination of an appropriate recommendation for a new OPS standard to the MPC.

5.2 The presenter confirmed that Wholesalers are currently not charged for failures to meet OPS measures and that a change to novel reporting to monthly is being progressed as part of MPC review.

5.3 A question was raised as to whether further SLA steps should be added to part G, the presenter informed the group that it could be appropriate but this is outside the scope of this session.

5.4 Committee members discussed the SLA relating to process G1 – Trade Effluent Enquiries which is given below,

*“...the Wholesaler shall make a substantive response to the party who submitted the enquiry within ten (10) Business Days of its receipt of the enquiry.”*

Committee members noted that the SLA requirement is subjective as completion hinges upon whether parties agree that the response sent or received is ‘substantive’. As such members did not believe it appropriate to use the G1 process SLA as an OPS.

5.5 Process G2: The MPC suggested Step 6 as a performance standard when considering Trade Effluent. The TEIC does not agree that this was an appropriate standard to monitor because at that point the trade effluent application process is not complete and may or may not continue.

5.6 Members had previously highlighted process G2 – Step 7

*“the Wholesaler shall make its final decision on the application within a maximum of two (2) Months beginning on the calendar day after the date on which the application was served on it and send notice of that decision to the Retailer and Non-Household Customer, any known prospective occupier and any consultees previously notified.”*

as being an appropriate standard to review. the Committee **AGREED** to that this may be suitable to recommend subject to approval at the next meeting.

5.7 Process G3 – Variations on Trade Effluent consents was discussed. Committee members noted that this process is only applicable to customers already in the market so would not be a suitable measure. It was noted separately that there was ambiguity in giving customers 2 months’ notice as this seems to be in addition to the requirement in the WIA91 rather than the same step. The presenter recommended considering this point as part of a wider question as opposed to this question on the OPS.

5.8 The SLA relating to step 3 of Process G4 – Trade Effluent Monitoring was discussed. This is given below

*“The Wholesaler shall provide the Retailer and its Non-Household Customer with the sample results in respect of any samples obtained within one (1) Business Day of the full sample results being available to it.”*

A Committee member informed the group that this was causing some concern due to limitations of legacy systems. Additionally, a Committee member expressed concern that this SLA may be too stringent as validation of the sample results i.e. a quick sense check on the results received, can sometimes take more than one day to conduct particularly if discussions with the lab must be considered. This was noted as being an operational issue that Wholesalers will have to resolve, because of the customer impact it was decided this would be another measure to recommend subject to approval from the Committee at the February meeting.

5.9 Process G5- Discontinuation of a Trade Effluent Consent. The SLA relates to the customer contacting the Wholesaler directly in the first instance to exit the market, it was decided this wouldn't be an appropriate measure to recommend. Additionally it is expected that NHH customer contact to Wholesalers in this respect would diminish.

5.10 Process G6- the Committee noted that there are no SLAs to consider in this process.

## 6. G/02 Form

6.1 Committee members were reminded that two members were in the process of reviewing the current G/02 form and have incorporated feedback from the Trade Effluent Practitioners Network (TEPN). A Committee member gave an update on the progress of the review and an update of the suggested changes.

- Annex 1 was removed – to be replaced with a link to the environment agency
- Alterations to the declaration section of the form
- Preamble to the form shortened and condensed
- Nature and composition section of the form – specify certain attributes more clearly e.g. Chemical Oxygen Demand (COD levels)
- The removal of some information on water usage in terms of volume allowances

The Committee were informed that the revised form will be circulated to members before the next meeting. Committee members agreed to review the suggested changes and provide feedback to the next meeting.

TEIC03\_07

## 7. Data

7.1 The Chair explained that the purpose of this session was to consider the items that were identified as data issues and discuss possible solutions and improvements. The Chair explained that the majority of the data related issues fall into two categories, those that relate to;

- The way in which CMOS functions
- Trading Party understanding.

The Chair also acknowledged that not all issues fit into these categories and there may be further underlying issues that need addressing.

7.2 The issue TEIC0009, given below, was discussed.

*“At this moment in time, Market Data that is incorrect and preventing billing to our Trade Effluent customers. Example: If a Trade Effluent customer was to switch this could impact our ability to final invoice”.*

Committee members believed this to be a training and knowledge issue driven, in part, by poor quality data uploads to CMOS. A member expressed the view that a number of Trading Parties are constrained by legacy systems and concluded that this issue is most appropriately resolved bilaterally between Trading Parties.

7.3 The issue TEIC0010, given below, was discussed.

*“data quality e.g. ensuring allowances are correctly accounted for, and that the correct charge elements are switched on.”*

Committee members highlighted that a large factor in determining the data quality is the way in which the data is being entered into CMOS. A Committee member highlighted that there are numerous way to achieve the same output when creating Trade Effluent site set ups and this can be the source of confusion amongst Trading Parties. The Presenter highlighted the importance of communication between parties to resolve these issues.

7.4 The Chair suggested that it might be useful for Committee members to feedback to the group scenarios that they are having difficulties addressing at the next TEIC meeting.

**TEIC03\_08**

7.5 TEIC064 was discussed. Problems where paired SPIDs have DPIDs that “Disappear”. Committee members highlighted that this issue was caused by a defect in CMOS that has since been rectified, so did not constitute a data issue.

## 8. AOB

8.1 MOSL agreed to circulate the slides from the previous user forum

**TEIC03\_09**

8.2 MOSL agreed to contact the proposer of the temporary trade effluent consent form to discuss whether they would be happy sending the current draft change proposal for consultation

**TEIC03\_10**