
Wholesale Retail Code Change Proposal – Ref CPW088

Modification proposal	Wholesale Retail Code Change Proposal – CPW088 – Enabling Wholesaler and Retailer to Update Meter Location Data and GIS X/Y
Decision	The Authority has decided to reject this Change Proposal.
Publication date	4 December 2020
Implementation date	N/A

Background

Retailers are responsible for submitting Meter Reads which are used for the purposes of calculating Primary Charges via the Settlement Process. As part of the drive to improve the quality of data in the Business Retail Market, the need for accurate and timely Meter Reads has been identified as a priority matter to be addressed. It is therefore important that meter locations are accurately reflected in the central system (CMOS), to allow Retailers to locate meters and Meter Reads to be taken.

Currently, Wholesalers can only submit the Meter Location Free Descriptor field (D3019) and Meter Outreader Location Free Descriptor (D3032) when initially creating the meter in CMOS using the T104.W transaction. As such, there is no transaction to allow a Wholesaler to amend D3019 and D3032 post-creation, should this be required. If there is an error or if the meter location information needs to be corrected, the Wholesaler must send a request to a Retailer who can update the D3019 and D3032 via the T160.R transaction (Update Retailer Meter Location Data).

In addition, the Retailer has no ability to add in or change an individual meter's GIS X and Y coordinates (D3017 and D3018 respectively) in CMOS. The GIS X and

Y coordinates are data items that specify the location of the meter Outreader, and the accuracy must be reasonable to facilitate finding the meter Outreader. To make the required additions and/or updates, the Retailer must request the Wholesaler to do so via the T113.W or TCORR113 transactions.

The issue

At present, Wholesalers can only submit meter locations when initially creating the meter in CMOS. Whereas Retailers have no ability to change the Meter GIS X and Y coordinates in CMOS. The Proposer (MOSL) believes both constraints add to potential delays in addressing incorrect customer meter issues in the market, can lead to the misinformation on meter location details, and can cause frictions between Wholesaler and Retailers who submit requests which then do not get completed in a timely manner.

The Final Recommendation Report suggests this Change Proposal has been raised to facilitate a more efficient and effective way for Wholesalers and Retailers to maintain and update the meter location details in CMOS. The Proposer believes this would positively impact the day-to-day activities of Retailers and, resultantly, improve the customer service experienced by the Business Retail Market customers.

The Change Proposal¹

This Change Proposal seeks to amend three Code Subsidiary Documents (CSDs) of the Wholesale Retail Code (WRC), as follows:

1. CSD 0301 – Data Catalogue;
2. CSD 0104 – Maintain SPID data; and
3. CSD 0105 – Error Rectification and Retrospective Amendment.

The solution proposed seeks to:

- Add meter GIS X and Y coordinates (D3017 and D3018) to transaction T160.R (and correspondingly T160.M) so that Retailers can update the GIS X and Y coordinates themselves; and
- Add Meter Location Free Descriptor Field (D3019) and the Meter Outreader Location Free Descriptor (D3032) to T113.W (and

¹ The proposal and accompanying documentation is available on the MOSL website at <https://www.mosl.co.uk/market-codes/change#scroll-track-a-change>

correspondingly T113.M), and TCORR113.W (and correspondingly TCORR113.M) transactions so that Wholesalers can amend the data fields.

These changes will allow the relevant Wholesalers and Retailers to update these Data Items, but the Final Recommendation Report highlights that the data ownership will not be transferred.

Industry consultation and assessment

An industry consultation was undertaken in relation to this Change Proposal. The consultation received 32 responses: 15 Wholesalers, 14 Retailers and 3 other respondents (Wheatley Solutions, Aquause and CCW). The full responses and a more detailed summary of these has been provided in the Panel's [Final Recommendation Report](#).

The majority of respondents (26 out of 32) supported the Change Proposal and considered that this would bring benefits for customers. A few respondents agreed that the solution will help reduce the number of long unread meters in the market, impacting customer billing and accuracy positively. Seven of these respondents noted that the solution represents a positive step towards improving meter data within CMOS which would help to improve the accuracy of meter read data, and that accuracy and availability of meter asset data is extremely important for the market to work efficiently.

Six Trading Parties (five Wholesalers and one Retailer) did not agree with the Change Proposal. Two respondents agreed with the principles and intentions of this proposal to facilitate improved market data, however they had reservations regarding the approach, including the premise of shared ownership between Trading Parties as well as having the belief that a better solution was available that would not require CMOS changes. A Wholesaler raised concerns about market data deterioration, which was a view echoed by other respondents who disagreed with the premise of the proposal. Key themes from the consultation and the responses provided by the Proposer are discussed below.

Data quality and ownership

A Wholesaler stated that they were aware of gaps present in this type of data within CMOS and therefore felt that completion of these fields would be beneficial. However, it raised concerns that there may be a small increased risk of meter data being overwritten with inaccurate data by either party. It therefore cautioned the use of such data without verification. This concern was shared by numerous respondents to the consultation.

Two Wholesalers agreed with the intention of this proposal to facilitate improved market data, however had reservations regarding the methodology. Another respondent agreed with the ability for Wholesalers to amend the Meter Location Free Descriptor field, but did not agree with the creation of transactions proposed in this solution allowing Retailers to amend the GIS X and Y coordinates, as this could result in market data deterioration (something which Wholesalers are auditable for). Another respondent expressed a concern over the premise of joint ownership of any Data Item as it makes transparency of responsibility and performance very difficult to manage and address where required. A Retailer noted that it was concerned that this change could lead to more data mismatches at a time when the market is trying to decrease those.

Solution not tackling market performance issues

A Wholesaler stated they believed this proposal was trying to address a long-standing performance issue rather than an issue with the market codes. It suggested that there is a need for transparency when data is shared, but it doesn't believe sharing data ownership is the correct answer. Another Wholesaler agreed with the importance of updating incorrect information requested by the Retailer in a timely manner. It recommended an alternative solution, where an SLA to encourage Wholesaler performance in this area could be introduced. It raised concerns that allowing both parties to have control over the meter location and GIS co-ordinates Data Items would ultimately lead to parties overwriting data the other party had entered which may have been useful.

A Retailer noted that it welcomes any improvements in meter location information, but, given its belief that market performance is reliant on good data, and the underlying principle that each Data Item has an owner who is responsible for updating it, it is concerned that allowing both Wholesalers and Retailers to make changes will undermine this principle, and could lead to confusion. It felt that the underlying issue with meter locations is that Wholesalers do not have a mechanism to make changes to the meter location, and that the Retailers' mechanism to get Wholesalers to change meters' GIS X and Y coordinates is not being followed.

Implementation and operational costs

The question of implementation and operational costs did not apply to several respondents, and some respondents noted that there would be zero costs or change processes within their organisation. For those who did respond on

implementation and operational costs, the majority of these related to ongoing operational resource costs for monitoring and quality checks to data.

One respondent noted that, as in most cases where software changes are required, costs would likely be driven into the region of more than £10,000. It noted ongoing operational costs are likely to be 'moderate.' One respondent noted no implementation costs, however it raised a concern over the risk of increasing operational costs (due to quality of free text location data provided by those inputting such data). A number of respondents noted that costs would be low (below £10,000) including one respondent that noted that costs would be less than £10,000 and would be with respect to quality checking of data entered by Retailers (volume dependant). One respondent quoted a cost between £10-50k as their internal systems and processes required amending.

CCW noted that enabling more accurate meter location data to be added into CMOS should help increase the number of actual meter readings being taken, leading to more customers' bills being based on actual reads. It stated that this should help to drive down the number of customer complaints that Trading Parties receive regarding billing and charging issues.

Benefits vs costs

The majority of respondents agreed that the benefits outweighed the costs, with several agreeing but giving no rationale behind their views. Two respondents highlighted that accurate meter location data in the market ought to help to reduce the number of long unread meters, as third parties should find it easier to locate meters and ultimately this would lead to settlement values being more accurate. Seven respondents agreed as they believed that there would be significant cost savings as a result of this change. A Wholesaler noted that although they agreed, they believed it would be useful to understand how much the solution would be used once implemented as they believed it may not be as widely used as initially thought.

Four Wholesalers stated that the cost of the change did not outweigh the market benefits. The reasons cited included the proposal posing some significant risks to long-term data quality (one specifically believed it would impact the level playing field requirements of the market). Another reason provided was that the desired outcome of the change could be achieved in a more cost-effective manner by utilising existing data fields. A different respondent believed this change seeks to address a problem which exists around current performance, rather than a structural problem with the market codes.

Objectives and principles of the WRC

26 respondents agreed that the change better facilitates the objectives and principles of the WRC (10 Wholesalers, 13 Retailers, and three other respondents, including CCW). Three separate respondents stated there would be better outcomes for the customer and accurate information on the meter assets location in addition to ensuring operational efficiency in the sector. Seven respondents agreed on the basis that delivering efficient and co-ordinated operations which provide data integrity would improve customer outcomes.

Six respondents stated that they believed the change did not better facilitate the objectives and principles of the WRC (five Wholesalers and one Retailer). One respondent believed that the proposal had the potential to deliver some short-term benefits but would introduce long-term risks. Another respondent echoed this point, adding that the desired outcome could be achieved by utilising existing data fields whilst safeguarding the concerns raised, such as the need for single accountability and control over the quality of any Data Item. Another respondent highlighted a point raised previously, where they believed the proposal tried to address long-standing performance issues rather than an issue with the market codes. The respondent was unsure of the benefit of the proposal in relation to the 'actual' issue, rather than what they believed to be a 'perceived issue' highlighted in the proposal. A Retailer shared these concerns and did not believe that the proposed change would better facilitate the Objectives and Principles, and was concerned that the change could lead to more data mismatches.

Additional comments

A respondent noted that this proposal would still allow erroneous data to be added into CMOS via input error. It suggested the potential use of a geocode system to be assessed in place of the proposed solution. Another respondent stated that it supported the intention of this proposal but believed that the solution proposed is misguided and that a better solution is available. One respondent questioned whether there had been consideration of what process should be followed if a Wholesaler and Retailer disagreed with the inputted Data Items.

A Retailer noted that this was a simple yet effective improvement, and another respondent stated that this proposal would deliver good improvements to some CMOS data, which it believed was the right thing to do.

A Retailer sought clarification on data ownership, considering the proposal meant both Wholesalers and Retailers would have the ability to update and amend each Data Item. A different respondent echoed this point, questioning what governance would be introduced to ensure the Wholesaler was not penalised for incorrect data in the market, when data had been changed by another party.

The Proposer's view on the consultation responses

Following the consultation, the Proposer noted views from respondents that all Trading Parties should have the ability to improve data to help improve better customer billing. As highlighted in the Final Recommendation Report, the Proposer believed the change had the potential to facilitate improved market data at a relatively low cost, with minimal risk. A number of respondents highlighted the risk of overwritten data and inaccurate data by either party. The Proposer responded by stating that in the market currently, the Retailer can already overwrite the Meter Location Free Descriptor Field (D3019), and there has been no industry wide issue identified or disputes (non-trading disputes) raised concerning Meter location comment field errors entered by Retailers, and that there has been more of an issue around some Wholesaler's historic meter location data. However, the Proposer believed the risk to be minimal in comparison to the benefit that would come from updating historically inaccurate meter data.

On the governance question that was raised, the Proposer noted that historic changes can be found in the Business Transition Date (BTD) fields in CMOS, therefore if it is found that a party updated a Data Item incorrectly, the evidence would be there. The Proposer also stated that all parties connected to the SPID would be notified of the change in data items where T113.W and T160.R transactions were used.

A number of respondents were concerned that allowing more than one party to update data fields directly may cause unintended consequences and Wholesalers should remain the data owner as meters are their asset. The Proposer noted these concerns and stated the solution had been adapted to clarify that the data ownership would remain with one party but would allow the other party to update. Should there be any disputes in this matter the data owner would have the final say.

The Proposer indicated that it would not be in any Trading Party's interest to update incorrect data. They noted that the Retailer is the party that visits the assets most often on the basis that they will incur MPS penalties and fail to gain meter reads if the data is incorrect. The Retailer is also best suited to update

the data quicker as they have direct contact with their meter read provider. They reiterated the purpose of the solution that it made sense if the Retailer can already update the Meter Location Free Descriptor Field, they should also be able to update the X/Y GIS Fields as well.

In responses to views suggesting that a guidance document should be produced to support the delivery of this proposal, the Proposer noted that the Retailer Wholesaler Group (RWG) will be leading on a Guidance document that would be ready for May 2021.

On the comment made by a respondent suggesting the location field should be a mandatory field, the Proposer noted that whilst this was a good suggestion, there is no plan to change the function of this field but it may be worth considering as part of the Strategic Metering Review.

Other suggested solutions included two separate fields, one for Retailers and one for Wholesalers, and adding a governance transaction approach to the solution. The Proposer reviewed these suggestions, and requested a High-Level Impact Assessment for one option. The Proposer felt that the proposed solution (taking into account the modified data ownership issue) was still the best value for money for Trading Parties.

Panel recommendation

The Panel considered this Change Proposal at its meeting on 21 July 2020. Three members voted in favour, seven against and two abstained and therefore the recommendation to the Authority was to reject this change.

Those who abstained and disagreed with the recommendation believed that the scale of the problem was not significant enough to justify the cost. The Panel recognised the intent of the change was to improve data quality and facilitate accurate meter reads. However, evidence that the current arrangements were contributing to a backlog of meter reads was anecdotal and it was unclear how much the amended transactions would be used.

Some Panel members shared respondents' concerns with the shared data ownership and questioned how data owners would be held to account. A member noted that Meter X-Y coordinates is a Wholesaler responsibility and they would be more in favour of incentivising Wholesalers to keep that data up to date.

Another member noted that the May 2021 release was congested, and other code changes should be prioritised.

Those in favour of the change believed that the market should be moving to shared data ownership and whilst there was some risk it would be a progressive step that would encourage collaboration. Another Panel member felt the benefit to customers of improved data accuracy and fewer unread meters outweighed the cost.

The Panel noted that MOSL was conducting a strategic review of metering and the issues highlighted by this change were likely to be picked up as the review mapped out the metering journey.

Our decision

We have considered the issues raised by the Change Proposal and the supporting documentation provided in the Panel's Final Recommendation Report, and have decided to reject the proposal.

Reasons for our decision

We acknowledge the points raised by the Proposer and respondents to the consultation and fully support the need to improve data quality to help address one of the key market frictions and facilitate accurate and timely meter readings. After considering the evidence received and the points made in consultation responses, we have concluded that the implementation of this Change Proposal will not better facilitate the principles and objectives of the WRC for the reasons set out below.

We are not convinced that the benefits of the Change Proposal outweigh the potential costs. In addition, we are supportive of views raised by some respondents that there could be a more effective, alternative solution developed to address the issues raised in this Change Proposal. We believe the issues concerned relate primarily to performance issues of accurately maintaining meter location details in CMOS, in a timely manner. We agree with a Panel member who suggested incentivising Wholesalers to keep the data up to date and therefore support a performance metric in this area being introduced under the Market Performance Framework and would encourage MOSL to take forward work in this area. This alternative method could be a more cost effective solution and have a significant impact on encouraging Wholesalers and Retailers to work together to maintain accurate meter location information in CMOS.

We also agree with the concerns raised by consultation respondents and the Panel in relation to data ownership, which could have possible longer-term impacts on the quality of market data. We think that the idea behind the

Change Proposal, which encourages both Wholesalers and Retailers to amend and update Data Items, could potentially blur the lines of responsibility and may make it difficult for data owners to be accountable. We agree with some respondents' views that the underlying principle of good quality data is that each Data Item has an owner who is responsible for updating it, and we share the concern that allowing both Wholesalers and Retailers to make changes may undermine this principle.

We acknowledge the Proposer's response to these concerns, that the solution was adapted to clarify that the data ownership remains with one party and should there be any disputes, the data owner would have the final say. However, we do not think that this response sufficiently addresses the potential risks around data ownership. Without appropriate assurance being in place, there is a risk that data quality could be further degraded if accurate meter location data is overwritten in error. Furthermore, Wholesalers and Retailers may be further discouraged from maintaining accurate meter location information in CMOS if there is no clear owner of the Data Items. Allowing Trading Parties to correct Data Items for which they are not responsible may thus defeat the purpose of this solution. The Proposer noted that the data owner would have the final say in case of a dispute, but it is not clear how this interplays with the data ownership obligations and the dispute resolution procedures under the WRC and the MAC.

We reiterate our support for MOSL taking forwards work to improve market data on meter location. MOSL may wish to take this forward by continuing to engage with the RWG and / or MPC as appropriate. MOSL may also want to consider this issue as part of its Strategic review of metering.

Decision notice

In accordance with paragraph 6.3.7 of the Market Arrangements Code, the Authority rejects this Change Proposal.

Georgina Mills
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