

February 2021

**Internal Meter Reads in the business
retail market: proposals to amend a
Customer Protection Change
Proposal – CP0008 – a consultation**

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1. About this document

The [Customer Protection Code of Practice](#) (“**CPCoP**”) sets out the minimum standards that all Retailers must comply with in their dealings with Non-Household Customers and sets out the behaviour that we expect from Retailers. Compliance with it is a requirement of Retailers’ licences and we have a duty to enforce against breaches of the CPCoP, in line with our [Approach to Enforcement](#).

This document sets out, for consultation, our proposed decision to amend the CPCoP Change Proposal raised by Castle Water. This Change Proposal (CP0008) sought to allow Retailers to bill customers based on ‘estimated consumption’ when experiencing practical constraints accessing and therefore reading internal meters due to Covid-19 restrictions – see section 4 and Appendix A. We are proposing to amend this Change Proposal and are seeking views on our proposed decision – see section 7.

In this document, we use the terms ‘Ofwat’ and ‘the Authority’ interchangeably. Unless otherwise specified, words and expressions used in this document are as defined in the CPCoP.

2. Code governance arrangements and modification

Where a Customer Protection Code Change Proposal has been received by the Authority, the Authority will consider responses to any relevant consultation carried out.

The Authority will consider and evaluate each Customer Protection Code Change Proposal to decide whether it agrees with the proposal, whether it considers amendments are required or whether to seek further information before making a decision on which it will consult. In each case, it must have regard to whether or not its decision is consistent with its wider statutory duties.

This consultation on the proposed decision to amend CP0008 has been issued in accordance with section 5.2.2 of the CPCoP. After this consultation has concluded, responses will be considered and a final decision will be made as soon as reasonably practicable.

In accordance with section 5.2.4 of the CPCoP, our final decision shall include:

- The reasons for the proposed change;
- The scope and impact of the potential change, including consideration of potential risks;
- An evaluation against our statutory duties and the Code Principles;
- And relevant evidence considered (including consultation responses received);
- Implementation timescales, which will take into account the likely impact on Retailer's existing systems and processes; and
- The date from which the change will take effect.

Urgency of the proposal

Section 5.2.2 of the CPCoP provides that consultations under this section should generally be for a minimum of 28 calendar days, except in the case of urgency.

Castle Water has argued that the Change Proposal is urgent as Retailers may be in breach of the CPCoP due to the practical constraints they are experiencing with accessing and reading internal meters due to Covid-19 restrictions. Specifically, the CPCoP requires Retailers to issue at least one accurate bill or invoice, each year, using a meter read where the supply is metered. This measure is designed to ensure that Non-Household Customers receive at least one accurate bill a year.

We recognise Castle Water’s arguments for urgency, being that some Retailers are likely to be in breach of this obligation in the CPCoP due to the practical constraints they are currently experiencing in trying to read internal meters and which, because this has been a problem for some time, has resulted in a large backlog of meters they now have to read. We did however receive mixed feedback on this issue in our recent [Call for Inputs: Customer Protection Code of Practice Change Proposal](#), where some Retailers stated that meter reading had not been affected or only in limited cases. However, because of the third national lockdown introduced in early January 2021, and in light of evidence we have received from Retailers that there are instances of non-compliance with the CPCoP and our duty to enforce against breaches, we therefore agree that the Change Proposal is urgent.

Given the urgency of this Change Proposal we shall be consulting on our proposed decision for 10 calendar days.

3. Responding to this consultation

We welcome your views on the questions detailed in section 8 of this document by **5pm on Monday, 1 March 2021**.

Please submit email responses to CPCOPcodechange@ofwat.gov.uk, with the subject '**CPCoP consultation – CP0008**'. Due to the pandemic, we are currently unable to accept responses by post.

We intend to publish responses to this consultation on our website at www.ofwat.gov.uk. Subject to the following, by providing a response to this consultation you are deemed to consent to its publication.

If you think that any of the information in your response should not be disclosed (for example, because you consider it to be commercially sensitive), an automatic or generalised confidentiality disclaimer will not, of itself, be regarded as sufficient. You should identify specific information and explain in each case why it should not be disclosed, which we will consider when deciding what information to publish. At a minimum, we would expect to publish the name of all organisations that provide a written response, even where there are legitimate reasons why the contents of those written responses remain confidential.

In relation to personal data, you have the right to object to our publication of the personal information that you disclose to us in submitting your response (for example, your name or contact details). If you do not want us to publish specific personal information that would enable you to be identified, our [Privacy Policy](#) explains the basis on which you can object to its processing and provides further information on how we process personal data.

In addition to our ability to disclose information pursuant to the Water Industry Act 1991, information provided in response to this consultation, including personal data, may be published or disclosed in accordance with legislation on access to information – primarily the Freedom of Information Act 2000 (FoIA), the Environmental Information Regulations 2004 (EIR) and applicable data protection laws. Please be aware that, under the FoIA and the EIR, there are statutory Codes of Practice' which deal, among other things, with obligations of confidence. If we receive a request for disclosure of information which you have asked us not to disclose, we will take full account of your explanation, but we cannot give an assurance that we can maintain confidentiality in all circumstances.

4. Background to Castle Water’s proposal

To ensure that Non-Household Customers receive at least one accurate bill each year, the CPCoP requires Retailers to issue at least one accurate bill or invoice, each year, using a meter read where the supply is metered. The CPCoP confirms that a Retailer can choose to accept a read taken by the relevant Non-Household Customer. In October 2020, Castle Water raised a Change Proposal, setting out its concerns with the practical constraints Retailers are currently experiencing with accessing and reading internal meters due to Covid-19 restrictions. This is resulting in a backlog of meters that require a meter reading to be scheduled. To address this issue, Castle Water proposed that a Retailer:

- may bill or invoice a customer based on ‘estimated consumption’ where:
 - the Retailer is unable to read an internal meter because of Covid-19; and
 - the customer has been asked to provide a read within a reasonable period but has been unable or unwilling to do so, or has not responded.

Please see Appendix A for the legal text proposed by Castle Water.

5. Reasons for Castle Water’s proposal

Castle Water states that the restrictions imposed by the UK Government on the opening of or access to business premises has had a major impact on the ability of Retailers to obtain meter reads, whether these are provided by Wholesalers and/or their contractors or third party providers. The closure of premises, combined with ‘stay at home’ and social distancing requirements, initially led all meter reading activity to cease: as a non-essential activity, meter reading would have been illegal.

Castle Water notes that even though meter reading substantively restarted in June 2020, this was only feasible for externally-sited meters, with many Wholesalers not having resumed the reading of internal meters for various reasons. Even if a resumption of internal meter reading activity were feasible and viable, Retailers will encounter a backlog of readings that needed to be resolved.

Castle Water state that the main rationale behind their original Change Proposal is to enable Retailers to explain, and to allow customers to understand, the reasons for the need for customer reads and the use of estimation if they are not available. As such, the intent of the proposed changes to the CPCoP is not to suspend the requirement in Section 9.2.1 in its entirety, but to allow circumstances where estimated consumption can be used where a meter read cannot be obtained and a customer does not provide one. Castle Water note that if the amendments are not made then Retailers would be faced with a choice of being unable to comply with the CPCoP and/or being prevented from issuing an accurate customer bill or invoice.

Castle Water state that it’s Change Proposal addresses practical constraints that Retailers are currently experiencing in accessing and reading meters. It considers that accepting this change would reinforce Ofwat’s commitment to responding in a timely and appropriate fashion, from a regulatory perspective, to developments in the market.

Code Principles

Castle Water considers that its Change Proposal is consistent with the Code Principles because:

- It facilitates Retailers being fair, transparent and honest with their Non-Household Customers. It will enable Retailers to explain, and customers to understand, the rationale for customer-reads and the use of estimation if they are not available, while being appropriately sensitive to the customer’s situation.

- It enables Retailers to provide appropriate and timely information to Non-Household Customers, who can then make informed choices about their billing.
- It ensures that information provided to Non-Household Customers (including via the CPCoP) is complete, accurate and not misleading.
- It enhances the effectiveness of customer service arrangements and processes for Non-Household Customers.

6. Evidence considered

Along with its Change Proposal, Castle Water shared some trial data it had gathered in September 2020 on obtaining internal meter reads. The evidence suggested that a significant number of internal meters were being unread due to the meter reading contractor being unable to access the meter. In December 2020, we issued a [Call for Inputs \(CFI\)](#) to understand the impact that Covid-19 restrictions were having on all Retailers' capability to successfully obtain internal meter reads.

When assessing the Change Proposal, we also identified that two terms in section 9.2.1 of the CPCoP ('metered' and 'meter read') were capitalised but did not have a corresponding definition. Our records showed that these terms have never been defined in the CPCoP.

To add clarity for customers and Retailers the CFI sought views on adding definitions that aligned with those set out in the Wholesale Retail Code ('WRC'), as follows:

- **Meter Read:** the reading of any meter for any purpose required under the Wholesale-Retail Code and, as the context requires, includes the data collected by such reading as submitted to the Market Operator in accordance with the processes set out in the CSDs, including estimated readings where permitted in accordance with CSD 0202 (Meter Read Submission: Process);
- **Metered:** any Water Services or Sewerage Services for which Usage is calculated from a metered source or a series of related metered sources.

The closing date for responses was 8 January 2021. We received nine responses – from seven Retailers, one Wholesaler and CCW. A summary of our analysis of responses is set out below.

The impact the Covid-19 pandemic is having on Retailers' ability to obtain internal meters and customer reads

The submissions we received showed a wide variance across Retailers. Some Retailers indicated that the restrictions have only had an impact on a small number of their customers. Some larger Retailers indicated that the restrictions have had a more significant impact, with two reporting a 30-36% reduction in the number of successful meter reads.

In addition, three Retailers indicated that missed read attempts have created a backlog of unread meters that are not included within the current meter reading schedule. Due to limited additional meter reading capacity in the market, Retailers noted that it could take from six months to several years to address this backlog.

To help address the issues experienced in obtaining successful internal meter reads, one Retailer stated that they had redesigned their processes. Once they had been notified of an unread read, they attempted to get a read from the customer via email or a letter. They had identified that sending a letter to a premises closed due to Covid-19 has a lower success rate in the customer responding compared to an email. The data provided by this Retailer showed that they were able to obtain more customers meter reads, compared with other Retailers of a similar size.

The submissions also highlighted how some Retailers had different approaches to obtaining internal meter reads during the Covid-19 pandemic. For example, one Retailer highlighted that due to safety concerns, as well as it being economically unviable, they would be postponing internal meter reads during the third national lockdown. This view was also provided by one of its meter reading contractors, a Wholesaler, who said they would not be reading internal meters. Other Retailers did not share this view, with most indicating that they continued to attempt reading internal meters, where safe to do so.

One Retailer highlighted that the difficulty they were experiencing was not just the inability to access internal meters, but also external meters that are located within outbuildings or within gated/locked boundaries requiring customer consent for access. They also highlighted that meter access issues were not simply limited to closed/vacant premises but also extend to businesses that have remained open. For example, the Retailer highlighted that reports from meter readers suggested that access has been refused because the premises had been too busy.

In its response to the CFI, CCW advised that billing and charges were the main cause of complaints from business customers to CCW, accounting for 74.9% of complaints in 2019-20. They raised concern at any amendment to the CPCoP which could increase the level of billing estimation in the market and inadvertently increase billing inaccuracies. They further noted that they would like to see more meter reads being taken by Retailers and being submitted by business customers, where it is safe to do so. Finally, they stated the importance that the industry does not move to estimates as standard. It will be important for Retailers to be able to demonstrate that all reasonable steps have been taken to achieve actual readings.

Views on the proposal to align the definitions for ‘metered’ and ‘meter read’ in the CPCoP and with those set out in the WRC

Severn respondents supported introducing definitions for ‘metered’ and ‘meter read’ into the CPCoP and aligning these with those in the WRC. The rationale provided by respondents in support was that this would provide greater clarity to Retailers on the commonality of defined terms in the codes.

CCW, whilst supporting aligning the definitions with the WRC, did note that the CPCoP is also used by Non-Household Customers. The definition for 'meter read' was quite technical and should be written in plain English, if possible.

Two Retailers did express concerns with aligning the definition of meter read to the WRC. One Retailer stated that they strongly opposed this because they believed that considering an estimated read as accurate data in the market encourages the wrong behaviour, inaccurate billing and poor-quality data. A different Retailer proposed some adjustments to the definition of meter read to allow for estimated reads where issues arise in obtaining meter reads.

7. Proposed decision

Having considered the available evidence we are proposing to amend the Change Proposal suggested by Castle Water.

We note from the CFI responses that the ability to obtain meter reads varies considerably across the market at this time. In some cases, Retailers are continuing to obtain meter reads to ensure customers' bills accurately reflect levels of consumption. In other cases, Retailers are reporting significant challenges in obtaining meter reads or engaging with their customers, for example, where business premises have completely closed.

Current Covid-19 restrictions do not ban meter reading activities (see Government guidance for outdoor work and for working in other people's houses which also includes safety guidance for employers) and these continue to be the responsibility of Retailers. As mentioned above, some Retailers have continued to successfully obtain meter reads despite the restrictions that have been imposed by Government guidance and legislation. In other parts of the economy, work involving access to private property has continued to progress. For example, white goods continue to be delivered into properties. Plumbers and electricians are able to access premises where work is required. We also note that in energy the roll out of smart meters has [continued on target](#) during the course of the pandemic. Though we acknowledge that obtaining access to residential premises, which in the majority of cases have remained occupied throughout the pandemic, may be less challenging than accessing business premises that have been fully closed.

We consider that where a site is completely closed or access is limited as a result of Covid-19 restrictions, some Retailers may encounter difficulties in obtaining a customer's consent to access internal meters or, in some cases, external meters that are located within restricted boundaries. Additionally, it may be more difficult to correspond with Non-Household Customers whilst premises remain closed. Retailers are obligated by their licences to comply with the CPCoP. We have a duty to enforce against breaches of the CPCoP, and we will consider what action is appropriate in line with our [Approach to Enforcement](#). In light of this, the evidence we have received through responses to the CFI and the exceptional circumstances that are currently being faced, we consider that a short, time-limited, change is necessary to the CPCoP.

However, we are concerned that as drafted, the Change Proposal may diminish the responsibility on Retailers to adequately engage with their customers in an effort to obtain a meter read or even understand consumption at a premises. As per the concerns raised by CCW, we are also concerned that the Change Proposal suggested by Castle Water could normalise the use of estimated consumption to calculate bills. This could potentially store up

undesirable billing shocks for customers further down the line and reduce the incentive on Retailers to pursue meter reading activities in the future.

Given the above, while we agree that there are likely to be difficulties for Retailers in obtaining meter reads in some circumstances, we consider that the Change Proposal suggested by Castle Water should be amended.

Our proposed amendments aim to retain the requirement for Retailers to issue an accurate bill or invoice each year, but would allow Retailers a conditional and time-limited exemption from having to use a Meter Read (where the supply is Metered) to provide an accurate bill. Our proposed amendments also place the onus on Retailers to ensure that they make all reasonable efforts to establish contact with the Non-Household Customer before utilising this exemption, and, in the event that Retailers are unable to make contact with the Non-Household Customer, provide a clear record of evidence that shows they have met the criteria for the time-limited exemption. We consider that this approach is more appropriate for Retailers and ultimately customers, for the reasons set out below.

Summary of our proposed amendments to the Change Proposal, on which we are consulting, and supporting rationale are set out below:

- **Update to the definition of ‘Minimum Information Requirements’** – To ensure customers are aware of the basis on which their bill or invoice has been calculated.
- **Amendment to section 9.2.1** – Retailers will still be required to provide an accurate bill or invoice to Non-Household Customers, regardless of whether an exception applies, thereby reducing the risk of bill shocks to customers.
- **New section 9.2.3 (a) and (b)** – Reflecting the impact of current Covid-19 restrictions on Retailers by providing a time-limited exemption to the requirement in section 9.2.1, in specific circumstances where they are unable to collect a meter read sited internally to premises.
- **New section 9.2.3(c)** – Enhancing the Change Proposal suggested by Castle Water, and thereby retaining strong customer protection measures, Retailers must make every effort to contact their customers to obtain a meter read. Retailers will be required to request a meter reading from a Non-Household Customer on two separate Business days. Noting that some Retailers only hold limited contact information for their customers, if possible, Retailers should use different communication methods to try and obtain these reads.
- **New section 9.2.3(d)** – To ensure Retailers properly understand consumption at premises, Retailers must be able to evidence the basis for billing and invoicing.
- **New section 9.2.4** – The exemption will only apply in limited circumstances and Retailers will be required to provide a clear record of evidence that such circumstances have been satisfied for every applicable customer. The commercial

viability of attempting to read meters is not relevant for these purposes and it should be possible for evidence to be provided to Ofwat, MOSL and/or the CCW at short notice, if requested.

We consider that our proposed amendments to the Change Proposal suggested by Castle Water are: consistent with our policy approach to meter reading whilst Covid-19 restrictions are in place; and support Retailers where necessary whilst not diminishing existing customer protections in the market. On 28 January 2021 we published a [joint statement](#) with MOSL, noting that that some ‘business as usual’ activities, such as reading meters, will prove difficult at this time. We considered it to be unreasonable to financially penalise trading parties for failing to meet Market Performance Standards (MPS) due to factors outside of their direct control and have therefore extended the suspension of MPS charges until the end of the 2020-21 financial year. We expect MPS charges to be reintroduced from 1 April 2021. While underperformance charges are currently suspended, trading party performance against all MPS measures continues to be monitored by MOSL and Ofwat.

We also recognise that customers can play a role by submitting meter reads to their Retailers. In light of financial pressures that many businesses are facing, Non-Household Customers – more than ever – will want to ensure that their bills accurately reflect the consumption that they are using. To try and encourage an increase in customer submitted reads, we have recently made updates to [our website](#) and used our social media to provide advice to Non-Household Customers on how they can take steps to support more accurate bills in cases where Retailers face challenges accessing meters and obtaining reads due to the current Covid-19 restrictions.

Addition of missing definitions

The responses to the CFI were broadly in support of adding two new definitions to the CPCoP. We consider it important that clear definitions are now included in the CPCoP to ensure that Retailers and their customers have a clear understanding of what the terms “Metered” and “Meter Read” mean.

We note that the majority of respondents to our CFI agreed with our proposal that these terms should be aligned to those within the WRC. However, two respondents did not support the addition of the definitions. One respondent raised concerns with estimates being used in the market and noted that this may encourage the wrong behaviour in Retailers. The other respondent provided certain circumstances where a Retailer may use estimates. We believe the concerns raised were related to Castle Water’s proposal, rather than the inclusion of the definitions.

It continues to be our preferred approach to include the two definitions in the CPCoP. We do not consider it appropriate to leave these terms undefined as the ambiguity could result in a variance of Retailer billing approaches in the market, which ultimately could be to the detriment of customers. Neither do we consider it appropriate to develop a bespoke definition for these terms. Aligning with the WRC ensures consistency between the CPCoP and the WRC and enables Retailers to use all types of Meter Read set out in the WRC to accurately bill customers under the CPCoP, including (as is already referenced), any Transfer Reads taken by the Non-Household Customer.

Our proposed amendments to the CPCoP

As stated above, we are proposing amendments to the Change Proposal suggested by Castle Water, which instead of providing a separate way of complying with this part of the CPCoP provide Retailers with a time-limited exemption to compliance where strict criteria are met and can be evidenced.

We set out below, for consultation, our proposed changes to the CPCoP.

Changes shown are to the current version of the CPCoP, rather than to the Change Proposal suggested by Castle Water. These changes set out proposed definitions, provide tightly defined circumstances in which the exemption will apply and require that Retailers record the evidence that such circumstances have been met.

Section 1, Definition and interpretation

Metered	has the meaning given in the Wholesale-Retail Code;
Meter Read	has the meaning given in the Wholesale-Retail Code;
Minimum Information Requirements	means the following information: (i) the Non-Household Customer’s SPID(s); (ii) the tariff and details of how the bill has been calculated, including, for example, the methodology for estimation where the bill is based on estimated consumption; (iii) whether the Terms and Conditions of Supply are pursuant to a Scheme of Terms and Conditions or the statutory duties of a relevant undertaker; (iv) any expiry date of the applicable Terms and Conditions of Supply; (v) ways to pay any outstanding debt; (vi) details of the relevant Retailer’s Complaints Handling Process; (vii) contact details for the relevant Retailer;

	(viii) other useful third party contact details, including the Authority and the Council;
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Section 9, Billing

9.2 Billing accuracy and frequency.

9.2.1 Retailers shall issue at least one accurate bill; or invoice each year. This bill or invoice must use a Meter Read where the supply is Metered unless Section 9.2.3 below applies.

9.2.2 Retailers can choose to accept Meter Reads, including any Transfer Read taken by the relevant Non-Household Customer.

9.2.3 Until 30 September 2021, or such other date as the Authority may notify in writing to Retailers, Retailers shall be exempt from the requirement to use a Meter Read where the supply is Metered for the provision of an accurate bill or invoice where all of the following sub-sections apply:

(a) the meter is sited internally to a premises (including external to a building but within the boundary of a premises), requiring consent of a Non-Household Customer for access; and

(b) due to restrictions on movement of people or access to premises imposed by guidance or legislation issued by the UK government due to Covid-19, the meter reader is not legally permitted to access, or the Non-Household Customer or its representative declines access to, the meter; and

(c) the Retailer has requested:

(i) on two (2) separate Business days; and

(ii) where possible due to the contact information held by the Retailer, using different communication methods,

that the Non-Household Customer provide a meter reading and the Non-Household Customer has not done so within fourteen (14) Business days of the final request being submitted; and

(d) where the Retailer uses another method by which to provide an accurate bill or invoice, for example estimated consumption, and has evidenced the methodology underlying this estimate which may include but is not limited to methodologies based on previous meter reads, type of premises, previous or on-going contact with the relevant Non-Household Customer.

9.2.4 On each occasion where the Retailer has relied on the exemption at section 9.2.3, the Retailer must retain a clear record which demonstrates compliance with section 9.2.3. For the avoidance of doubt the exemption at 9.2.3 will not apply where a Retailer does not carry

out, or attempt to carry out, meter readings because it does not consider it to be commercially viable. The Authority, Market Operator or the Council may request this record with two (2) Business days' notice.

9.2.35 Any final bill to be issued to a Non-Household Customer shall be issued within six weeks of the earlier of the Transfer or the termination or expiry of the Terms and Conditions of Supply.”

Code Principles

We consider the amendments we are proposing to the Change Proposal are consistent with the following code principles:

- 4.1.1 – ‘Retailers shall be fair, transparent and honest; while putting the customer at the heart of their business.’
- 4. 1.3 – ‘Retailers shall ensure they provide appropriate and timely information to Non-Household Customers to enable them to make informed choices.’
- 4.1.4 – ‘Any information provided to Non-Household Customers shall be complete, accurate and not misleading.’

We believe the amendments to the CPCoP will ensure that Retailers continue to be fair, transparent and honest with Non-Household Customers on the method of calculation of their bills. The proposed measures for Retailers to retain a clear record of evidence for the basis of estimated consumption for each customer, will also ensure that customer protections continue. Specifically, Retailers will be held to account with compliance with the CPCoP requirements to read customer meters, where it is possible to do so.

Proposed decision on the date of implementation

We have considered the potential impact on Retailers' existing systems and processes. Subject to the responses to this consultation, we consider that the impact should be low.

We propose that the implementation date for CP0008 to be the same date as the publication of our decision. We intend to publish an updated version of the CPCoP on the same day as our decision document.

8. Consultation questions

The questions we would welcome responses on in relation to this consultation on our proposed decision to amend the Change Proposal suggested by Castle Water, are detailed below. Where appropriate, answers should be supported with evidence.

1. What is your view of our proposed decision to amend the Change Proposal suggested by Castle Water?
2. Please provide your views on the proposed length of the exemption being until 30 September 2021, noting that Ofwat, may by notice to Retailers, shorten or lengthen the exemption period.
3. Do you agree that the minimum requirement should be on Retailers to seek contact with a Non-Household Customer in the proposed legal drafting to 9.2.3 (c) Specifically:
 - a. on two separate Business days; and
 - b. where possible due to the contact information held by the Retailer, using different communication methods.
4. What is your view of whether the amended Change Proposal promotes and facilitates the General Principles of the Customer Protection Code of Practice (section 7 of the CPCoP) and Ofwat's statutory duties?
5. What is your view of the legal drafting for the amended Change Proposal (see section 7)? Please provide rationale to support your answer.
6. What is your view of the proposed implementation date (see section 9)?

9. Conclusion and next steps

This consultation will close at **5pm on Monday, 1 March 2021**.

Following the closure of this consultation, we will consider responses prior to issuing our final decision. See section 3 and 8 of this document for details about how to respond to this consultation.

We will endeavour to make the decision on the Change Proposal as soon as practicable following closure of this consultation.

Appendix A – Legal text originally proposed by Castle Water

As part of CP0008, Castle Water proposes to insert a new Section 9.2.3 into the CPCoP as follows, please see Appendix A.

“9.2 Billing accuracy and frequency.

9.2.1 Subject to Section 9.2.3 below, Retailers shall issue at least one accurate bill, or invoice each year which uses a Meter Read where the supply is Metered.

9.2.2 Retailers can choose to accept Meter Reads, including any Transfer Read taken by the relevant Non-Household Customer.

9.2.3 Until such date as may be notified by Ofwat, the requirement in Section 9.2.1 above may be met by the use of estimated consumption where all of the following sub-sections apply:

- (a) the meter is sited internally to a premises (including external to a building but within the boundary of a premises), requiring consent of a Customer for access:
 - (b) due to restrictions on movement of people or access to premises imposed by guidance or legislation issued by the UK government due to Covid-19, the meter reader cannot access, or the Non-Household Customer or its representative declines access to, the meter; and
 - (c) the Retailer has requested the Non-Household Customer to provide a meter reading and the Customer has not done so within [14] days of the request.

9.2.~~34~~ Any final bill to be issued to a Non-Household Customer shall be issued within six weeks of the earlier of the Transfer or the termination or expiry of the Terms and Conditions of Supply.”

**Ofwat (The Water Services Regulation Authority)
is a non-ministerial government department.
We regulate the water sector in England and Wales.**

Ofwat
Centre City Tower
7 Hill Street
Birmingham B5 4UA

Phone: 0121 644 7500
Fax: 0121 644 7533

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