

September 2026

Statutory consultation: CPW162 – Cyclic Read Skip Codes

About this document

The Wholesale Retail Code (WRC), which forms the wholesale contract between Wholesalers and Retailers operating in the Business Retail market and sets out the services provided and the obligations of each party, is enforceable by Ofwat.

We have considered and are minded to approve WRC Change Proposal CPW162 – Cyclic Read Skip Codes with some modifications to the legal drafting. This document is a statutory consultation issued under the provisions of s.66DB/s.117G of the Water Industry Act 1991 (WIA) in relation to the proposed change to the WRC.

Executive summary

We recognise that increasing the level of transparency and engagement with interested parties improves the quality of policy making by bringing to bear expertise and alternative perspectives and identifying unintended effects and practical problems.

We are therefore consulting on our draft decision document on Wholesale Retail Code Change Proposal CPW162 – Cyclic Read Skip Codes. We have considered the issues raised by the Change Proposal and the supporting documentation provided in the Code Change Committee's (CCC) Final Recommendation Report (FRR) and are currently minded to approve the proposal for implementation in the May 2027 Central Systems (CMOS) release. We have concluded that implementation will better facilitate the principles and objectives of the Wholesale Retail Code detailed in Schedule 1 Part 1 Objectives, Principles and Definitions, and is consistent with our statutory duties.

The objective of this consultation is to make all interested parties aware that we are minded to approve this Change Proposal, and to ensure they have the opportunity to bring forward any evidence and views that have not previously been submitted as part of the change development process. We are particularly keen to learn of any possible unintended consequences or benefits from implementing this change that have not previously been highlighted and considered as part of the solution development process.

Having considered any representations submitted during the consultation period in response to this consultation notice, Ofwat will decide whether or not to approve it for implementation.

Responding to this consultation

We would welcome any comments on this document. Please email them to codechange@ofwat.gov.uk or post them to:

CPW162 Consultation response
Ofwat
Centre City Tower
7 Hill Street
Birmingham B5 4UA

The closing date for this consultation is 8 October 2026. If you wish to discuss any aspect of this consultation, please email codechange@ofwat.gov.uk.

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 and provide a redacted version of your response, 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.

1. Our assessment of this WRC Change Proposal (CPW162)

1.1 Background and process followed

We received the CCC's FRR for this Change Proposal, CPW162 – Cyclic Read Skip Codes, the CCC recommended that we approve the Change Proposal.

Following receipt of the FRR, Ofwat has analysed the evidence submitted and reviewed the draft legal text which is intended to give effect to the proposed solution.

1.2 The Change Proposal CPW162

This proposal CPW162 seeks to standardise and mandate the use of a list of 15 Regular Cyclic Read skip codes to improve market visibility and data accuracy.

Several housekeeping amendments have also been incorporated into the Change Proposal. Further detail is set out in section 2 of this document.

1.3 Our minded to position

Ofwat is minded to approve the Change Proposal with modifications to the legal drafting (see Appendix A). The reasons we are minded to approve this change are set out in the draft decision document in section 2 of this document.

1.4 Consultation questions

We welcome responses to the following questions:

1. Do you agree with Ofwat's minded to position? Please give the reasons for your response.
2. Do you have any additional evidence to offer that has not previously been submitted during development of the solution for this Change Proposal? If yes, please provide this evidence and explain why it was not submitted during the change development process.
3. Are there any unintended consequences that could arise from implementation of this Change Proposal which have not previously been highlighted?
4. Are there any additional benefits to customers or the market that have not already been articulated during development of the Change Proposal?

2. Minded to Position: Wholesale Retail Code Change Proposal – CPW162 – Cyclic Read Skip Codes

Modification proposal	Wholesale Retail Code Change Proposal – Ref CPW162 – Cyclic Read Skip Codes
Decision	The Authority has decided to approve this Change Proposal with modifications
Publication date	To be confirmed following consultation
Implementation date	To be confirmed following consultation – implementation is proposed to align with the May 2027 CMOS release.

We are approving this Change Proposal with modifications to the legal text

We consider that ensuring use of a standardised list of Regular Cyclic Read skip codes in the Central Market Operating System (CMOS) will further the primary principle of the Wholesale Retail Code (WRC) as it will facilitate steps to resolution where a meter cannot be read. Additionally, use of a centralised list of skip codes will facilitate market analysis to understand the issues that are resulting in missed Regular Cyclic Reads.

We have made some modifications to the legal text to ensure that this is clear and achieves the intended aim of the Change Proposal.

Background

When a meter cannot be read, Trading Parties currently apply a discretionary skip code in CMOS to explain why the meter read was unsuccessful.

This information can be used to determine the reason why the meter was not read and to indicate what remedial action might be required. This can include, for example, raising a bilateral Request for repair or replacement of a faulty meter.

The issue

To help drive more consistency in skip codes for Regular Cyclic Reads and to understand meter reading issues, the [Retailer Wholesaler Group](#) (RWG) developed an advisory list of 49 skip codes. However, analysis by the Market Operator across a group of 12 Trading parties has shown that around 411 different skip codes have been used. This suggests that Trading Parties are not adhering to the advisory list published by the RWG. The Final Recommendation Report (FRR) highlights that use of this list is voluntary and there are no incentives or repercussions for not using the recommended skip codes.

As Trading Parties are not using a single agreed list of skip codes, this can result in inconsistent communication about why a meter has not been read and the appropriate remedial action. The FRR details that as of January 2026, 111,680 (8.83%) of the market's meters were long unread (last read more than 12 months ago) and around 9,000 are legacy long unread meters (i.e. have not been read since the market opened in April 2017). To help bring these meters back into service, it is stated that the market requires unified data which explains why these meters have not been read.

Missed meter reads can result in negative outcomes for customers who may experience inaccurate billing where estimated reads are used in place of Regular Cyclic Reads. Customers are at increased risk of experiencing bill shocks once an accurate meter read is taken for a legacy long unread meter¹. Further, where skip codes are not recorded, this can result in there being no transferable history to explain why a read was missed and what action has/has not been taken to seek to resolve this.

The Change Proposal

This Change Proposal seeks to standardise and centralise Regular Cyclic Read skip codes to improve market visibility and data accuracy. The FRR details that the proposal includes:

1. Creating a standard list of 15 skip codes across four issue categories: meter, access, customer and safety. These codes will be defined in CSD0301.
2. Creating a codified process to record and maintain skip codes centrally in CMOS and associated Bilateral Hub enhancements.
3. Introducing a requirement for Trading Parties to submit a skip code within 15 Business Days of the date that the Regular Cyclic Read could not be taken.

The proposal additionally includes that the Market Operator will provide skip code reports to Wholesalers and Retailers on a monthly basis. These reports will provide detailed information about skip code entries recorded in CMOS over the last two years.

The proposed skip codes are:

Category	Sub-code	Meaning
Meter issue	MR	Meter Removed
	MB	Meter buried
	NMS	New meter in situ
	DAM	Meter damaged
Access Issue	OBST	Meter temporarily obstructed
	OBSP	Meter permanently obstructed
	NACC	No access to premise - general
	IA	Insufficient address

¹ Although, section 9.3.1 of the Customer Protection Code of Practice restricts the timeframe over which Retailers are permitted to back bill customers to help mitigate customer exposure to such bill shocks.

	DERL	Premise in situ but derelict or boarded up
	VAC	Premise empty/for sale
	IML	Cannot locate a meter – insufficient meter location/meter not in location described.
Customer issue	RA	Refused access to premise
	APP	Appointment required
Safety issue	HSM	Health & safety issues accessing meter
	HSP	Health & safety issues accessing premise

The Change Proposal also includes housekeeping changes to the following Code Subsidiary Documents:

- CSD 0202 – Meter Read submission: Process – change to the definition in section 2.3.6 (d) to implement CPW163 amendments.
- CSD 0203 – Meter Read submission: Validation – change to include G Read in the preceding read types. This should be treated in the same way as where the preceding read C.
- CSD 0301 – Data Catalogue – change in section 2.5 as the Data Item Logical Type integer value has been updated in CMOS and amendments to some Data Items to correct inconsistent naming.
- CSD 0302 – Standing reports and data extracts – as CPM052 added new section 19 and removed 17 (on bilateral hub reports), CSD 0302 does not explicitly mention non-MPF SLAs appearing in the M15/M18 reports (implied by the 'SLA type' flag).a

Industry consultation and assessment

This Change Proposal was developed in collaboration with the RWG and metering committee, both of which are expert groups with a range of industry representatives.

In addition to this collaborative engagement, two consultations were held to develop the proposed solution.

Initial consultation

The initial consultation took place between 21 July and 1 August 2025. There were 17 responses (nine Wholesalers, seven Retailers and CCW).

This consultation sought views across a range of questions to help understand the support for the proposal and for example, implementation factors such as costs and timeframes.

Most respondents supported the proposals to standardise skip codes in CMOS, citing benefits such as enabling more effective market wide analysis. One respondent said that the data

would highlight whether a Retailer is trying to read meters or not, and potentially whether they are taking the right steps to resolve issues on the back of a skip. CCW highlighted that skipped reads lead to estimated bills which bring uncertainty for customers. This can result in bill corrections and unexpected catch-up charges, which can cause dissatisfaction and complaints from customers.

Three respondents did not agree with the proposal to standardise skip codes. One Wholesaler thought standardisation along with any future modifications may have a considerable impact on meter reading providers and Wholesalers who deliver meter reading services. Another Wholesaler thought that the change could instead lead to an increase in unread meters. This Wholesaler felt that the Change Proposal sought to establish accountability via an oversimplified view of skip codes rather than understanding the underlying issues preventing meter reading. A Retailer that did not agree thought that each Retailer would be required to develop middleware to map existing codes to the new standardised set, which represents a significant resource investment with limited operational benefit.

Regarding implementation, the consultation sought views on potential challenges translating existing skip codes into a mandated list agreed upon by the market. Most respondents did not foresee any issues. However, five respondents raised concerns. Two Wholesalers highlighted potential significant challenges, including that the change would require substantial changes to current systems and processes, resulting in associated costs. These Wholesalers also said that the change would impact household meter reading activity/processes with one of these Wholesalers stating that there are potential considerable costs and a significant operational impact. One Retailer said it has a number of different meter read providers who collectively use over 300 different skip codes. They also put their view that achieving full alignment across meter reading providers would be extremely complex and it was unlikely that a mapping exercise would ever achieve total accuracy.

Obstacles to implementation raised by respondents included system challenges, particularly for Wholesalers with household meter data or multiple providers. Other obstacles cited were handling of free text, the proposed timelines to investigate and upload skip codes and time required to enable automation to avoid manual inefficiencies.

Most considered that the implementation costs were justified, although three Wholesalers sought an additional breakdown of the costs with one noting that it was difficult to determine whether the costs were justified and another suggesting use of an existing CMOS transaction. A different Wholesaler did not think that the costs were necessary and that the majority of costs would arise from Trading Parties' changes to their own systems, workflows and contracts. One Retailer said that the costs did not appear to have been explained in the engagement brief and queried the plan for CMOS handling an additional volume of data.

The initial consultation explored a proposed solution of the list of skip codes sitting outside the WRC. However, this element of the proposal was not taken forward because of concerns

that Trading Parties are likely to incur additional costs due to changes in the skip code list, if and when they occur.

Several respondents raised concerns regarding the design of the solution, for example:

- There is a lack of clarity on the exact change and whether this sought to standardise skip codes and observation/trouble codes. This respondent highlighted much larger system and training changes if this also related to trouble codes.
- The practicality of matching skip codes and the clash with the approach to household customers.
- Concerns around whether the change will benefit the market and is more likely to have the opposite effect.
- There is no real-life implementation trial to determine whether this is workable in practice.
- Concerns regarding the proposed timeframes for submission of skip codes into CMOS.
- Concern that the legal drafting refers to 'Meter Read' and includes that skip codes could be sent in lieu of Final Reads as Final Reads can currently be submitted as an estimate.
- That reporting should be limited to each Retailer's portfolio as visibility of other Retailer portfolios could have unintended consequences on market dynamics.

The consultation also sought views on the time needed to prepare for implementation of CPW162. Four respondents were unclear or did not provide a response. Around half of respondents answering this question thought that they would require around six months (with six of these responding that they would need less than six months). Four respondents said that they would need between six and twelve months and one respondent would require twelve+ months.

Final consultation

Skip code list

The final consultation asked respondents for views on the final list of skip codes. The majority of respondents supported the proposed skip codes. However, a Wholesaler flagged that changing the skip code list would require system updates, training and time to implement. It thought that the existing Wholesaler skip codes already provide actionable insights without full standardisation. Another Wholesaler, while supporting a standardised list of codes, did not believe the proposed list fully represented the feedback shared by the working group, e.g. regarding the 'supply check required' (SUPCK) code. This respondent also thought that the codes needed to be expanded to be explicit. Other comments from Wholesalers included that one would require more time to understand how the proposed codes map to their existing skip codes, and another would welcome the data from use of the standardised codes to be shared to target individual improvements. A Retailer broadly agreed with the proposed list

but challenged the use of three codes suggesting that they were either not needed as they were covered by other codes, or were not really a skip code.

The consultation additionally asked whether there were any additional skip codes that should be included in the list and whether any required separation to provide greater granularity. Most respondents to this question did not consider that there were any to add, although some suggested additions such as adding 'health and safety', a skip reason specifically for SMART meters, 'out of hours' and 'tripped meter'. A Retailer suggested including a mechanism for determining which codes should take precedence to promote consistency across the market. Several respondents provided thoughts about introducing greater granularity; a Wholesaler thought that when a bilateral Request is raised following use of a skip code, there should be an expectation for the Trading Party to detail any mitigation they have taken in response to a list of visit sub codes to reduce the number of incorrect bilaterals and ensure the correct course of corrective action. Another Wholesaler thought that meter access skip codes might need to be more granular as e.g. access may only be temporarily blocked. It was also suggested that a guide should be provided with some common use cases to ensure consistent application.

The Proposer highlighted in response that the disputed codes were presented to the RWG skip code sub-group on 26 January 2026 for assessment. For each code the sub-group offered a rationale as to why they were or were not being integrated into the final list. Post consultation RWG agreed to remove the 'supply check required (SUPCK)' and 'Unmanned (UMN)' codes from the final list.

Systems changes

The consultation elicited support from all respondents for introduction of a new transaction (T106) for Wholesalers and Retailers to submit skip data to CMOS. However, one respondent stated that the published legal drafting does not confirm whether this transaction will be accessible via the Medium Volume Interface (MVI). It was highlighted that MVI access is essential for processing skip data efficiently—without it, reliance on LVI would make this a highly manual and time-consuming task. In addition to the overall support for introduction of the new transaction to submit skip codes to CMOS, all respondents supported use of the TCORR182 transaction to remove skip data from CMOS.

Most respondents supported renaming the bilateral process B5 free-text field to 'skip code additional information' to align with CMOS standards, which would improve consistency and clarify responses to failures. One Wholesaler however did not agree, as it thought that renaming the field could constrain the information that is being shared and thus reduce the likelihood of successful outcomes. A Retailer welcomed the change but strongly recommended extending the functionality to CMOS as well. Another respondent queried whether it would still be possible to add attachments and images in the free-text field as they are extremely valuable to long-term understanding of meter locations/barriers/etc. The Proposer highlighted in response to this concern that due to file size limitations it will not be

possible to submit photographic evidence for any processes currently in CMOS and that this falls outside of the scope of CPW162.

With regard to the proposal to host skip code data in CMOS, most respondents supported this. Reasons given included that this will ensure Trading Parties are using the same set of skip codes and will support better visibility across the market as to why meters are not being read. A Retailer that supported inclusion in CMOS considered that the drive to include these is largely driven by the "flawed and unfair design of the new MPF", which takes no account of geographical difference and challenges and does not distinguish between where a read cannot be obtained for reasons outside a Retailer's control, as opposed to where a Retailer has not attempted to read a meter. This Retailer thought that the Change Proposal would not have been required if the MPF had been "designed properly". One Wholesaler raised that it was not entirely clear where this information will be available to view in the Low Volume Interface (LVI).

The Proposer stated in response that Trading Party systems will be impacted based on their level of integration with CMOS and structural complexity. The proposal is not seeking to change skip codes that Trading Parties use with their contractors, only that they map these codes correctly to CMOS. Concerning the user interface, changes to the LVI screen to submit and remove skips will be made visible and clear.

Implementation

Trading Parties were asked about implementation costs. Several respondents thought that costs were currently unknown or would need further exploration. Where costs were given these varied. For example, one Wholesaler did not anticipate any costs but another Wholesaler expected significant costs (over £100,000) as the change would impact its meter reading contract, system and household billing system. Retailers generally thought that more work would be needed to explore costs. One Retailer explained that the most significant cost will be the updates to systems it has which connect to the High Volume Interface, as well as creating automation to map its internal list of skip codes to the ones that will be used in CMOS.

The majority of respondents agreed that the CMOS costs were justified. However, one Wholesaler that did not agree was still unclear on the benefit of the proposal to the market or the value that the change could bring. A Retailer thought that, while the costs were quite high for a relatively small change, these were in line with previous changes that the Market Operator has made and it did not have immediate concerns.

In respect of implementation costs, the Proposer stated that by providing improved insight on the drivers behind skipped meter reads, CPW162 can act as a key enabler of future improvements in meter reading success rates. To illustrate this point the Proposer highlighted that "if related improvements increase the number of meters read by RF by 1% to

91.7%, this would increase actual volumes in RF by £1.03m. The potential to increase accuracy of settlement is considered to outweigh the cost of the change".

A question was asked specifically about operational and systems changes that Trading Parties might need to make to implement the Change Proposal. One Wholesaler highlighted that there may be some serious impacts relating to non-market meters, this Wholesaler does not include skip codes directly within its household billing system and to supply skip code data for its c.1,300 non-market meters it would need to make a change for all 2.4 million household meters which would be disproportionate. Although, another Wholesaler stated that it has a small number of non-market meter reading skips each month and therefore anticipated minimal operational and system impacts. Other comments from Wholesalers included:

- Challenges mapping skip codes, including manual processing of a substantial volume of free-text comments from meter readers. This task will require systems changes, otherwise it would be highly resource-intensive and inefficient.
- Routine updates to workflows and reporting processes, which in turn would necessitate additional staff training.
- Implications for current contracts with third-party meter reading service providers would need to be reviewed to ensure alignment with the new requirements.
- Systems will need to be adapted to send new transactions.

The majority of Retailer respondents also highlighted the need to make systems changes to accommodate the new transaction.

In terms of the timeframe for implementation, most respondents thought that they would require around six months or less (with several stating between three and six months). However, one Wholesaler said that it would require up to 12 months and another thought that it would need up to two years from Ofwat's approval, depending on the complexity of the changes and availability of resources.

The Proposer noted that most consultation respondents required up to six months for system implementation.

Challenges aligning with proposed skip codes

When asked about potential challenges aligning with proposed skip codes Trading Party responses highlighted the following:

- Significant expense and time-consuming activity to introduce billing system changes.
- Intended outcomes could potentially be achieved through alternative solutions.
- Migration of existing skip codes may result in complications with historic reporting and data continuity.
- Challenges for meter reading service providers, including embedding new definitions.

- Challenges with interpretation and mapping of skip codes.
- Non-household skip codes overlap with household skip codes which may present an issue in aligning fully.
- Potential operational inefficiencies; to achieve the granularity that is needed, a full end-to-end review of meter reading processes would be required.

Regarding the potential challenges highlighted by respondents, the Proposer assured the market that the transition can be conducted through a simple mapping exercise where Trading Parties create reference documents linking current codes to the new standardised list. This avoids the need for immediate system changes and parties can transition their systems over time.

Impacts of the proposal

Respondents were asked whether the impacts described in the engagement brief had been correctly captured and whether there were any further impacts that had been missed.

One Wholesaler did not think that there was evidence to suggest that adding skip data centrally will benefit anyone and will create additional non-productive work for both MOSL and Trading Parties. Another Wholesaler highlighted that there will be financial, systems and operational impacts which were not captured in the engagement brief. It was also stated by a Retailer that impacts on third-party providers had not been fully considered.

Regarding missed impacts, most respondents had nothing further to add. However, one Wholesaler highlighted that it was not fully clear how the recent GSS changes for meter reading would impact the market codes or how the proposed skip code list links up with GSS guidelines and responsibilities. Another Wholesaler highlighted a potential spike in bilateral submissions from Retailers once the list goes live. A Retailer highlighted that meter reading service providers will incur costs for these changes. One Retailer also raised concerns that SPIDs with a poor read history may have fewer opportunities to switch if skip read history is shared across the market. CCW highlighted that the impact on customer bills should be considered when skip codes are used and that this should not become a way to refrain from resolving the difficulty of reading a meter.

Views of the Customer Representative

The FRR sets out that CCW is supportive of the aim of this Change Proposal, which is seeking to enhance transparency and data accuracy. CCW considers that by harmonising the reasons why a meter read is skipped, the market will establish accurate routes to resolution for faulty or underperforming meters. Over time CCW hopes that this will contribute to increasingly accurate bills for customers as the reliance on estimates falls.

Code Change Committee (CCC) discussion and recommendation

The CCC considered this Change Proposal at its meeting on 10 February 2026. It recommended, by unanimous decision, that the Authority approve this proposal.

The CCC thought that there was uncertainty about the financial assumptions presented in the FRR and that the report placed too much emphasis on the projected market savings and not enough on the customer benefit. The CCC considered that the proposal would improve the primary principle as it would provide consistent and unified skip code data. The CCC noted that accurate and timely meter reads form the basis of accurate customer bills and that standardisation of skip codes should enable resolution of meter read issues, which in turn can contribute to greater accuracy of settlement and customer bills. The CCC thought that the current list and variety of skip codes used inhibits the market's focus or activity to resolve matters preventing meters from being read.

The CCC also considered that the proposal furthers the principle(s) of seamless Non-Household Customer experience, transparency and clarity, proportionality and efficiency.

Statutory consultation

We have determined that it is necessary to consult on this Change Proposal as it seeks to change Trading Party obligations with respect to Regular Cyclic Read skip codes. Skip codes would become mandatory to enter into the Central Systems where a Regular Cyclic Read cannot be obtained. Additionally, the consultation conducted by the Market Operator demonstrated that some Trading Parties had concerns regarding potentially high implementation costs and operational impacts.

Our decision and reasons for our decision

We have considered the issues raised by the Change Proposal and the supporting documentation provided in the CCC's FRR and have decided to approve the proposal with modifications to the legal drafting (see Appendix A). We have concluded that the implementation of CPW162 will better facilitate the objectives and principles of the Wholesale Retail Code detailed in Schedule 1 Part 1 Objectives, Principles and Definitions, and is consistent with our statutory duties.

We agree with the CCC's assessment that this Change Proposal will further the primary principle as the current list and variety of skip codes used can inhibit market focus or activity to resolve matters preventing meters from being read. We consider that mandating use of a consistent set of skip codes can also be used to inform routes to resolution for long unread and legacy long unread meters. Where these data are used to inform action to reduce the number of skipped meter reads, this can contribute to improved settlement and customer billing accuracy, thereby also reducing the number of back bills which can result in bill shocks for customers.

The work that has been undertaken to refine the list of skip codes to an agreed list of 15 codes to be used in CMOS has resulted in a solution that better aligns with the principles to be simple, cost effective and secure, as well as proportionality. We consider that use of a consistent set of skip codes centrally will create greater transparency and clarity across the market around issues which result in skipped meter reads. Analysis of this data set can be used to define and drive market improvement initiatives where required. While Trading Parties are expected to use the centralised list of skip codes in CMOS, they have the option to map existing skip codes to the centralised list, rather than being required to replace existing codes used outside CMOS. This contributes to ensuring a more proportionate operational burden associated with implementation.

We note that the roll out of smart meters should help reduce the number of skipped meter reads over time. However, we consider that implementation of this solution will help to generate data and information that can contribute to reducing the number of long unread and legacy long unread meters in the meantime.

With regard to the housekeeping changes that have been included in the Change Proposal, we consider that these further the principle of transparency and clarity. For example, these changes seek to correct errors and ensure alignment with existing CMOS functionality.

Our amendments to the legal drafting have been made to correct typographical errors, to ensure correct use of defined terms and to ensure it is clear that the skip code obligations relate to Regular Cyclic Reads.

Decision notice

In accordance with paragraphs 6.7.5 of the Market Arrangements Code and s.66DA / s.117F of the Water Industry Act 1991 and having carried out the procedure required by s.66DB and s.117G of the Water Industry Act 1991, the Authority approves this Change Proposal.

Shaun Kent
Director, Business Retail Market

Appendix A: modifications to legal drafting

The revisions to the proposed legal drafting are shown in red below.

CSD0202: Meter Read Submission Process

6. Submission of Skip Codes

- 6.1. In the event that a ~~Regular Cyclic~~~~Meter~~ Read cannot be obtained (e.g due to technical issues or access restrictions), ~~as a result a Meter Read cannot be provided~~, a corresponding Skip Code shall be provided as set out in CSD 0301 (Data Catalogue) to the Market Operator within fifteen (15) Business Days, using the Data Transaction T106.R/ T106.W (Submit Skip Code) to indicate the reason as to why the meter could not be read.
- 6.2. For the avoidance of doubt, the submitted Skip Code shall not have an impact on charging and shall therefore be excluded from all Settlement.
- 6.3. Once a ~~-~~Skip Code entry is recorded in the Central ~~Market~~ Systems, a Trading Party may not change or update it. Instead, the entry must be removed using the Data Transaction TCORR182.R /TCORR182.W (Remove Skip Code), to remove ~~either~~ the Skip Code.

Skip Code Submission

6.4. Process description

Step a – Submit Skip Code (T106.R / T106.W (Submit Skip Code)

- 6.4.1. The process descriptions in this CSD should be read in conjunction with the process diagram and the interface and timetable requirements in each subsequent section. The step references appear beside each action or decision symbol in the process diagram. Reference shown thus TXXX.M relate to the associated Data Transaction, as set out in the CSD 0301 (Data Catalogue).
- 6.4.2. The Market Operator responds to all Data Transactions submitted by Trading Parties with a T109.M (Accept or Reject). The T109.M notifies either rejection of the Data Transaction submitted or acceptance of the Data Transaction submitted. If the Data Transaction is rejected an appropriate error code is provided in the T109.M. If the Data Transaction is accepted and the Market Operator needs to provide additional information back to the Trading Party, it will send the relevant information in a different Data Transaction in addition to the T109.M sent to notify acceptance. For simplicity of presentation, the T109.M may not be identified explicitly in the process steps, process diagrams and interface and timetable requirements.
- 6.4.3. All Skip Codes shall be submitted to the Market Operator using Data Transaction T106.R / T106.W (Submit Skip Code).
- 6.4.4. The deadline for the submission of Skip Code by both the Retailers and Wholesalers is within ~~fif~~teen (15) Business Days from the date ~~of~~ the ~~Meter~~Regular Cyclic Read could not be taken.

6.6 Interface and timetable requirements

Skip Code submission process

<u>Step</u>	<u>Action/ Decision</u>	<u>Process Step</u>	<u>From</u>	<u>To</u>	<u>Time parameter</u>	<u>Comments</u>	<u>Data Transaction</u>
a	A	Submit Skip Code	Retailer or Wholesaler	Market Operator	Within 15 BDs of the date of the failed Meter Read		T106.R, T106.W

CSD0301: Data Catalogue

Data Item Number	D3047
Data Item Name	Skip Code
Data item Logical Type	UTF-8string (12)
Member of unique serial set	No
Member of Valid Set	Yes
Data Owner	Retailer or Wholesaler
Description	Used to submit Skip Code when a Meter Regular Cyclic Read cannot be obtained
Used in Data Transaction	T106.R, T106.W, T106.M, TCORR182.R, TCORR182.W, TCORR182.M

Data Item Number	D3048
Data Item Name	Skip Date
Data Item Logical Type	Date
Member of unique serial set	No
Member of Valid Set	No
Data Group	Meter
Data Owner	Retailer or Wholesaler
Description	Indicates the date when a Meter Regular Cyclic Read could not be obtained.
Further Details	
Used in Data Transaction	T106.R, T106.W, T106.M, TCORR182.R, TCORR182.W, TCORR182.M

Transaction Name	Notify Skip Code	
From	Market Operator	
To	Wholesaler, Other Wholesaler (unless Other Wholesaler is Water), Retailer, Other Retailer (unless Other Retailer is Water), Incoming Retailer, Outgoing Retailer, plus any relevant Wholesalers and Retailers if meter is in a Meter Network	
Data Item Number	Name	Notes
D2001	SPID	Will be included if provided in T106.W or T106.R
D3013	Meter Manufacturer	Will be included
D3014	Manufacturer Meter Serial Number	Will be included
D3047	Skip Code	Will be included
D3048	Skip Code Date	Will be included
D4003	Text Comment Field	Will be included if provided in T106.W or T106.R
Description	A notification from the Market Operator of a Meter Regular Cyclic Read to the Retailer, Wholesaler, Other Retailer and Other Wholesaler as relevant.	
Additional Notes		

CSD0105: Error Rectification and Retrospective Amendments

Remove Skip Code Entry

6.2.51 In accordance with the process in section 6.1, Trading Parties may submit the TCORR182.W or TCORR182.R (Remove Skip Code) Data Correction Transaction to remove a Skip Code entry in the Central ~~Market~~ Systems.

CSD0302: Standing Reports and Data Extracts

The following changes are required to be made to the proposed text in CSD0302:

- Update to the contents page to include the new section 20, and
- Amend section 20.4.1:

20.4.1 The Report shall include:

(a) Meters that ~~did not have a could not be~~ successfully Regular Cyclic Read; and

CSD0601A: Bilateral Data Catalogue (Part A Data Items and Valid Sets)

Data Item Number	D8602
Data Item Name	Skip Code Additional Information Reason
Data Item Logical Type	UTF-8string(1024)
Member of unique serial set	no
Member of Valid Set	no
Data Group	Service Request
Data Owner	Originator
Description	Indicates additional information surrounding the skip code reason or description for the failed Regular Cyclic Read meter read attempt or skip details to obtain a meter read for the meter.
Further Details	
Used in Data Transaction	T351.R, T351.W, T351.M

Data Item Number	D8651
Data Item Name	Skip Date
Data Item Logical Type	Date
Member of unique serial set	No
Member of Valid Set	No
Data Group	Service Request
Data Owner	Wholesaler
Description	Indicates the date when a meter r Regular Cyclic Read could not be obtained.
Further Details	
Used in Data Transaction	T351.R, T351.W, T351.M

6.5.

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

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