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9 May 2025

Dear Graeme

Smart meter guaranteed standards: Supplier Guaranteed Standards of Performance

Thank you for the opportunity to respond to your Consultation dated 28 March 2025. This response is on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. We are Great Britain's largest electricity Distribution Network Operator, dedicated to delivering a safe, secure and sustainable electricity supply to 8.5 million homes and businesses.

We believe the review of the Supplier Guaranteed Standards of Performance is necessary given the current metering landscape and support the proposed amendments. Our responses to relevant questions are in the appendix below.

If you have any questions, please do not hesitate to contact me in the first instance.

Yours sincerely

Paul Measday
Regulatory Compliance & Reporting Manager
UK Power Networks



Appendix

Q1. Do you agree the 2015 regulations should be updated to reflect the current metering landscape and explicitly mention smart meters?

UK Power Networks believes that the 2015 regulations should be updated to reflect the current metering landscape and include explicit reference to smart meters.

Q2. If yes, what areas of the 2015 regulations do you consider should be updated to reflect that they apply to smart metering?

UK Power Networks believes explicit reference to smart meters and In Home Displays (IHDs) within the General Interpretation section would offer the removal of any ambiguity when considering whether guaranteed standards apply for smart meters and/or IHDs. In addition to the above, UK Power Networks believes that a reference to energy monitoring applications (e.g. those on mobile devices) could be made here, for example if the Smart Meter and the supplier's application on the customers mobile phone are operating in Smart Mode, but the IHD is non-functioning, the regulations should be clear on whether this falls in scope or out of scope.

Q3. Do you agree that a new standard to ensure requests for smart meter installation appointments are fulfilled within a set number of weeks is right for consumers?

UK Power Networks, as a Network Party, do not provide appointments for the installation of smart meters and we are therefore not commenting on what timeframes should be in the standard, but believe that it must be unambiguous in how the timeframe is calculated to cater for bank holidays. The regulations should also be drafted so as to not penalise suppliers (i.e. shorter timescales) in bank holiday heavy seasons such as Easter and Christmas.

Q10. Do you agree a new standard to ensure consumers receive compensation for failed smart meter installations, where the failure is within a supplier's control, is right for the consumer?

UK Power Networks, as a Network Party, believe that this standard must be consistent with the guaranteed standards in place for DNOs where DNOs are responsible for compensation payments for failures both from the licensed company and any agents/contractors undertaking work on their behalf.

Q15. Do you agree that this standard would support customers with suspected problems with their smart meters, and IHDs?

UK Power Networks agrees that this standard would help support customers with suspected or proven problems with their smart meters and/or IHDs.

Q16. Do you agree the best approach is to expand on the existing "Faulty meter" and "Faulty prepayment meter" standards?

UK Power Networks agrees that the best approach is to expand the existing "faulty meter" and "faulty prepayment meter" standards, but also believe a further expansion to clarify the situation for IHDs and supplier applications would be required to remove any potential ambiguity of the standard and ensure it was applied correctly.

Q17. Are there any other factors not clearly outlined you think need to be considered?

Please see our response to Q16.

Q18. Do you agree a new standard to ensure consumers receive compensation for a smart meter that does not operate in smart mode, which is within a supplier's control to resolve, and has not been resolved, is right for consumers?

UK Power Networks agrees that a new standard in this regard is right for consumers and would mark a notable step forward moving the focus from installation to functionality. This shift in focus will help ensure the benefits of smart meters can be delivered.

Q19. Do you agree with our initial views of “in scope” and “out of scope”?

UK Power Networks agrees with the initial views of “in scope” and “out of scope”.

Q20. Do you agree with our initial views on what constitutes a “smart meter” and “not operating in smart mode” for the purposes of this proposal only?

UK Power Networks believes that further clarification is required for “not operating in smart mode”. This is because it is unclear as to what types of readings are covered and also the required accuracy of those readings.

By way of examples:

- if a meter is “operating in smart mode” for consumption readings but not for voltage readings, would this count as “in scope” or “out of scope”?
- if the meter was “operating in smart mode” but the readings were clearly erroneous or impacted by clock drift issues, would this count as “in scope” or “out of scope”?

Q21. How do you consider “actions of another party” could be clearly defined for this proposal?

We believe this could be more clearly defined as “solely actions of another party (or parties)” as this would remove ambiguity and keep consumers protected where actions are required by more than just the supplier.

Q24. Do you agree that for each instance of an “in scope” smart meter not operating in smart mode, the consumer should receive another compensation payment if the meter remains not operating for 365 days, and for every other 365-day period thereafter?

UK Power Networks agrees that compensation for long-standing issues is good for consumers and should also encourage the resolution of the underlying issue. We believe clarity would need to be provided on how long the meter has to be “fully operational” for before it is considered to be “operating in smart mode” otherwise intermittent communication issues could occur, and remain out of scope of these standards leading to a poor experience for consumers, especially considering that 365 consecutive days is a long period of time.

Q25. Are there any other factors you think need to be considered that have not been covered in this section for this proposal?

UK Power Networks believes that intermittent issues need to be considered by the proposed standards.

By means of an example:

- A Smart Meter “operates in smart mode” for one month, and then “does not operate in smart mode” for three months, returns to “operating in smart mode” for one month.

In this example the customer would be initially in scope for the period of one month, and then no longer in scope, this would mean that for intermittent issues they would not be in scope for additional payments outlined in Q24.

We believe that including a provision in the standards to address repeat or multiple instances of a smart meter “not operating in smart mode” would be beneficial for consumers.