

This response is submitted on behalf of Northern Powergrid Metering Ltd, a Meter Asset Provider (MAP), with our primary focus on the domestic energy metering sector.

We support the intent to modernise the 2015 regulations to reflect the smart metering landscape. Clarity in definitions especially around meter faults, installation failures, and asset responsibility is required to avoid unnecessary accountability or needless meter removals. We stress that updates must clearly distinguish the differences between faults with meters and those related to communications hubs or In-Home Displays (IHDs).

While broadly supportive of the proposed consultation, we raise caution where increased compensation incentives might unintentionally drive early asset removals. Fault attribution must be clear to prevent MAPs from bearing responsibility for issues outside their control, such as failed communications or supplier-led installation errors. Any standards affecting MAPs particularly around SMNOSMs (Smart Meters Not Operating in Smart Mode) should ensure regulations do not mislead to where abouts the issues lie.

Question	Response
Q1. Do you agree the 2015 regulations should be updated to reflect the current metering landscape and explicitly mention smart meters?	Yes. As the metering landscape is now predominantly 'Smart', it is essential the regulations reflect this to provide clarity. There is potential for MAPs to be drawn into accountability if certain asset responsibilities are not clearly defined.
Q2. If yes, what areas of the 2015 regulations do you consider should be updated to reflect that they apply to smart metering?	There must be clear definitions of meters, appointment setting, and differing faults.
Q3. Do you agree that a new standard to ensure requests for smart meter installation	Yes, the new standard would be beneficial but may increase demand on MOPs to provide resource and may also have an impact on increased meter removals.

appointments are fulfilled within a set number of weeks is right for consumers?	
Q4. Do you agree that six weeks is an achievable timeframe to meet?	As a MAP we have no view.
Q5. Do you agree this should apply to new/first-time smart meter appointments only?	As a MAP we have no view.
Q6. Do you agree this should only apply in cases where a consumer is technically eligible to have a smart meter installed, and what do you consider those cases to be?	As a MAP we have no view.
Q7. Are there any other exemptions that should be considered with this standard?	As a MAP we have no view.
Q8. Do you agree a consumer could receive this compensation every six weeks should a supplier not be able to offer an appointment in that time frame?	This may lead to excess meter removals.
Q9. Are there any other factors not clearly outlined you think need to be considered?	MAPs may be penalised indirectly via contracts despite external factors not in their control.
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?	Yes, anything that encourages a supplier to install a working and operating smart meter is positive.

Q11. Are there any scenarios within an energy supplier's control leading to failed smart meter installations that have not been covered?	As a MAP we have no view.
Q12. Do you agree this should be applicable to both first-time and replacement smart meter appointments?	Yes. From the consumer perspective, the expectation of a successful install applies in both cases. However, this could increase reverse logistics costs for MAPs if more meters are returned as part of failed installs.
Q13. Do you agree there should be no restrictions on the number of times a consumer could receive this compensation?	As a MAO we have no view.
Q14. Are there any other factors not clearly outlined you think need to be considered?	Fault definition & designation must be clear, including distinction between install errors and asset defects as vague fault categorisation could lead to financial claims.
Q15. Do you agree that this standard would support customers with suspected problems with their smart meters and IHDs?	Yes. MAPs may see higher volumes of incorrectly flagged "faulty" meters requiring investigation and return due to a faulty IHD not related to a meter fault.
Q16. Do you agree the best approach is to expand on the existing "Faulty meter" and "Faulty prepayment meter" standards?	N/A
Q17. Are there any other factors not clearly outlined you think need to be considered?	Misdiagnosis could increase MAPs apparent failure rates.
Q18. Do you agree a new standard to ensure consumers receive compensation for a smart meter that does not operate in smart mode,	Yes, but again it requires clear identification between supplier/network/comms and asset responsibility.

which is within a supplier's control to resolve, and has not been resolved, is right for consumers?	
Q19. Do you agree with our initial views of "in scope" and "out of scope"?	N/A
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?	N/A
Q21. How do you consider "actions of another party" could be clearly defined for this proposal?	N/A
Q22. Do you agree that 90 days is an appropriate timeframe to resolve smart meters not operating in smart mode in the future?	As a MAP we have no view.
Q23. Do you agree consumers should receive compensation for both gas and electricity meters if applicable?	Yes, if both meters are not operating in smart mode, but for MAPs this may lead to removal of dual-fuel assets even when only one is at fault.
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?	As a MAP we have no view.

Q25. Are there any other factors you think need to be considered that have not been covered in this section for this proposal?	N/A
Q26. Do you agree that the proposals under consideration in this consultation are beneficial for non-domestic consumers?	Yes, anything that encourages a supplier to install a working and operating smart meter is positive but should not be an incentive to remove the meter.
Q27. Do you agree with the rationale and proposed scope (both in terms of business size, meter type and timeframes, where applicable) of the proposed Guaranteed Standards under consideration in the non-domestic sector?	Yes
Q28. Across all the Guaranteed Standards, are there any other opportunities or risks with respect to the applicability of the proposed Guaranteed Standards to the non-domestic sector that we should consider?	N/A
Q29. If you agree that the Guaranteed Standards under consideration in their present form should be applicable to the non-domestic sector, do you have any suggestions to tailor or alter the details and scope of the Guaranteed Standards to better suit the needs of non-domestic consumers?	N/A
Q30. Do you agree that the compensation amount for the Guaranteed Standards under consideration could be further tailored to the non-domestic sector?	Somewhat, Compensation proportional to business size could be considered.

Q31. Which (if any) of the proposed options (Option 1 and Option 2) do you agree with for determining the compensation amounts for non-domestic consumers?	N/A
Q32. Do you have any other considerations to determine the compensation amount for non-domestic consumers?	N/A