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LANDIS+GYR RESPONSE TO CONSULTATION ON PROPOSED CHANGES TO SMART METER GUARANTEED STANDARDS: SUPPLIER GUARANTEED STANDARDS OF PERFORMANCE

Dear Sir

Please see below Landis+Gyr's response to the above consultation

Best regards

Tony Pile

Landis+Gyr

Landis+Gyr response to OFGEM consultation on Smart meter Guaranteed Standards: Supplier Guaranteed Standards of Performance

Landis+Gyr welcome the opportunity to respond to this consultation. As a long-established meter manufacturer, we have provided more than 21 million smart meters to GB energy suppliers and are intimately involved in initiatives to support improved smart metering operations for all our customers. We applaud the goal of driving improvements for end-consumers and feel this initiative will ultimately benefit all stakeholders and improve public perception of smart metering.

As a manufacturer of smart gas and electricity meters our focus is supporting energy suppliers in delivering the best possible smart experience to consumers. We recognise that energy suppliers and consumer bodies are the key stakeholders for these proposed changes to the Smart Meter Guaranteed Standards. Therefore, we will limit our consultation responses to those questions relevant to our industry position and focus on areas where we believe improvements can support the goals of delivering improved standards of performance

Landis+Gyr responses to specific consultation questions are set out below. If the question is not listed below, then we are not offering a response

Investigating smart meter operational issues

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

Landis+Gyr recognises consumer frustration where constituent parts of the smart metering system do not work as expected. Creating a standard by which energy supplier should advise customers of their investigation into a suspected fault is a positive step in supporting the customer

However, within the smart metering system there are a multitude of possible reasons for an error or fault which might involve; individual devices, network system, HAN/WAN communications and local systems. Whilst some faults are

common, well understood and resolvable (e.g. through a remote reset of the Comms Hub) there are many apparent fault conditions that are difficult and resource consuming to diagnose. These may require the energy supplier bringing together a wide range of parties to investigate and determine the underlying issue. In some cases, the issue may be within the supplier's control but just establishing the point of failure can be an incredibly complex task

Landis+Gyr has over a decade of experience working with energy suppliers to triage, diagnose and resolve smart metering issues. During the initial stages of the smart metering rollout the DCC had the role of testing interoperability across all smart devices and systems. DCC were able to receive incident reports from suppliers and use their position as network operator to conduct a full analysis of the root cause. Device manufacturers were then approached to resolve specific weaknesses or interoperability issues. This led to steady improvements in performance and reliability as the smart meter rollout accelerated

Where suppliers identify customer impacting issues, their ability to reach a prompt resolution is hampered by the complexity of the smart system. In recent years, this centralised fault diagnosis and resolution capability has reduced. Efforts to resolve complex smart meter problems are time consuming, often because it is not clear which component is the root cause. An individual manufacturer such as Landis+Gyr must rely upon the goodwill of other manufacturers and network parties to investigate and resolve issues. All this takes time and does not adequately support the suppliers in delivering the best possible smart metering service to their customers

Landis+Gyr consider that customers with smart meter problems will ultimately be best served through providing suppliers with improved issue resolution capability

We suggest Ofgem give consideration to a centralised smart meter diagnostic system that reviews all issues raised by customers and determines (using full network access and expertise) the root cause of the problem and the responsible component, whether that be a communication network, device or systems issue. We believe that logically, this capability would sit with DCC

In a number of cases, it may not be possible for a supplier to establish and resolve the issue between the time the incident is reported and the proposed point at which compensation is due. This will inevitably result in smart devices, or in some cases the full set (meters, Comm Hub & PPMID) being replaced. A recent report from PA Consulting¹ highlighted that 94% of smart meters returned to manufacturers suspected as faulty, had no identifiable fault. Suppliers continue to pay rental costs on de-installed devices and ultimately this drives inefficiency in the smart metering system with these costs ultimately passed on to energy consumers. Increasing the compensation payment is only going to drive this removal behaviour, whereas L+G believe suppliers should be better supported in identifying and resolving genuinely faulty meters more quickly, and where possible achieve this through remote action, avoiding the inconvenience of a customer visit and disruption to their power supply

¹ "A smarter approach to smart meters" PA Consulting