



Utility Customer Service Management Ltd.

Submission to Ofgem
April 2025

Smart meter Guaranteed Standards: Supplier Guaranteed Standards of Performance

UCSM Ltd. is a Utilities consultancy spanning all utilities predominantly across the south of England and targeted towards small to medium sizes developments – often managed by small scale developers, over 85% of our work is in the area of domestic supplies.

We are not a third-party intermediary but do interreact with suppliers on behalf of our Customers.

We have in the past been active in stakeholder engagement with various DNO's and Ofgem and, continue this engagement where there is evidence of added value for Customers and/or the industry as a whole.

	Question	Response
1	<i>Do you agree the 2015 regulations should be updated to reflect the current metering landscape and explicitly mention smart meters?</i>	Yes. Include metering aspects but don't create a metering subset i.e. smart and non-smart meters – this just complicates matters and we feel it needs to be kept simple for all concerned. At same time, address regulation 17 as there is in our view, no justification for excluding connections.
2	<i>If yes, what areas of the 2015 regulations do you consider should be updated to reflect that they apply to smart metering?</i>	Further Guaranteed Standards that refer to “meter” and not a sub set of metering.
3	<i>Do you agree that a new standard to ensure requests for</i>	Yes but, it should apply to all metering.



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	<i>smart meter installation appointments are fulfilled within a set number of weeks is right for consumers?</i>	
4	<i>Do you agree that six weeks is an achievable timeframe to meet?</i>	Yes
5	<i>Do you agree this should apply to new/first time smart meter appointments only?</i>	No – it should apply to all.
6	<i>Do you agree that 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?</i>	No – it should apply to all.
7	<i>Are there any other exemptions that should be considered with this standard?</i>	No – exemptions create an opportunity for suppliers and places additional burden on Ofgem to “Police”. By keeping it simple, it is much easier to follow indeed, the regulations (we feel) need to be made simply for all to easily understand.
8	<i>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?</i>	Yes, most certainly. We have just spent 6 month trying to get a supplier to do some metering works which is wholly wrong – unless Ofgem disagree?
9	<i>Are there any other factors not clearly outlined you think need to be considered?</i>	Yes, 42 pages of consultation – it needs to be kept simple!
10	<i>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?</i>	Yes, it is also right for the supplier and the industry as a whole but, please don't create a metering sub-set.
11	<i>Are there any scenarios within an energy suppliers' control leading to failed smart meter installations that have not been covered?</i>	Yes, some suppliers will find whatever excuse they can to avoid such failures (sometimes with the support of Ofgem). By keeping it simple, this should be harder to do.
12	<i>Do you agree this should be applicable to both first time and replacement smart meter appointments?</i>	Yes and for all meters – smart and classic!
13	<i>Do you agree there should be no restrictions on the number of times a consumer could receive this compensation?</i>	Yes – but up held! By having a relaxed approach now will cause compliance issues in the future resulting in failed Customer trust.
14	<i>Are there any other factors not</i>	Yes, by keeping it simply, this reduces the



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	<i>clearly outlined you think need to be considered?</i>	burden on all parties including Ofgem and should lead to regulatory cost savings.
15	<i>Do you agree that this standard would support customers with suspected problems with their smart meters, and IHDs?</i>	On the face of it yes provided it is kept simple.
16	<i>Do you agree the best approach is to expand on the existing "Faulty meter" and "Faulty prepayment meter" standards?</i>	Yes
17	<i>Are there any other factors not clearly outlined you think need to be considered?</i>	Yes, regulation 17 detailed above and steps toward simplification.
18	<i>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?</i>	Yes – it is a service failure.
19	<i>Do you agree with our initial views of "in scope" and "out of scope"?</i>	Yes
20	<i>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?</i>	Provided it is kept simple, we would agree.
21	<i>How do you consider "actions of another party" could be clearly defined for this proposal?</i>	Another party in this context is likely to be a party contracted to the supplier – all based upon the original "Supplier Hub" principle which simply does not work and is not upheld by Ofgem. Even this month we have been forced to correspond with an appointed meter operator (good as they are in this instance) in relation to residential suppliers. This has come about because suppliers have been allowed to "get away with it" and hence, recovery is challenging. It is very much based on this we would say – if new regulations are introduced, keep them simple and ensure they are complied with – this means determination request should commence on the basis that the supplier is wrong – unlike what occurs now.
22	<i>Do you agree that 90 days is an appropriate timeframe to resolve smart meters not operating in smart mode in the future?</i>	Yes
23	<i>Do you agree consumers should</i>	Yes – but when will this approach be



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	<i>receive compensation for both gas and electricity meters if applicable?</i>	upheld? Indeed, we feel there is value in merging gas and electricity Guaranteed Standards completely.
24	<i>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?</i>	Yes – why not?
25	<i>Are there any other factors you think need to be considered that have not been covered in this section for this proposal?</i>	Yes – please see answer to forgoing questions.
26	<i>Do you agree that the proposals under consideration in this consultation are beneficial for non-domestic consumers?</i>	Yes – however, Ofgem have created sub-sets of Customer when there is really no need and this just causes additional work and complexities. All this is to protect Customers – and fails! There are indeed, further steps that can be taken to protect Consumers e.g. when an appointed supplier is required to upgrade a meter – it can take months and the Customer is unable to go to an alternative supplier for the service – leaving the Customer completely un-protected.
27	<i>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?</i>	No - see answer to question 26.
28	<i>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?</i>	Yes – many and the core issue is lack of support from the Energy Ombudsman and extends to the and is with the full knowledge of, Ofgem.
29	<i>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</i>	Yes – no need for sub-sets which have already been created.



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	<i>consumers?</i>	
30	<i>Do you agree that the compensation amount for the Guaranteed Standards under consideration could be further tailored to the non-domestic sector?</i>	No - no need for sub-sets – keep it simple.
31	<i>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?</i>	Neither – why complicate the matter – keep it simply and have same for both sectors.
32	<i>Do you have any other considerations to determine the compensation amount for non-domestic consumers?</i>	Yes, lift the profile of Guaranteed Standards, it is not in the best interested of poor operators to promote these and as a direct result – Customers are failed and in the absence of reasonable protection and/or support – this will continue and get worse.

General

The above answers are very much based upon first hand experience with a number of DNO's, The Energy Ombudsman and Ofgem and directly related to Guaranteed Standards. In this respect we have found it very easy for DNO's and suppliers to disregard Guaranteed Standards which in itself could be considered tolerable however, when this is supported by Ofgem – the regulator itself then this dilutes the very foundation for which the Guaranteed Standards stand for.

Our recent experience in this regard the request for 6 determinations as follows;

- Determination requests ruled for Customer – 1
- Determination requests ruled against the Customer with zero justification – 1
- Determination requests declined with little or zero justification – 4

Based on this, we fail to see how introducing yet more Guaranteed Standards can help Customers when existing Guaranteed Standards are not maintained by the regulator. Indeed, we would go further and suggest this is one of the root issues with how the market and in particular Customers view the industry.