

Smart Meter Guaranteed Standards: Submission from the Scottish Federation of Housing Associations (SFHA) – May 2025



Response overview

SFHA is the membership body for, and collective voice of, housing associations and cooperatives in Scotland. We exist to represent, support and connect our members and together, we work to ensure that everyone has a safe, warm and affordable home.

We support the principle that consumers who want a smart meter should be able to get one installed quickly and they should work as intended. As noted in the consultation document, and reflected in feedback from our members, many households have experienced delays in getting a smart meter, whilst others have had challenges with their operation once installed.

We therefore welcome the further improvements to the Guaranteed Standards of Performance for smart meters and routes to compensation when these are not met. However, there are some circumstances where the suggested timescales for meter installations and resolving operational issues will still result in considerable consumer detriment. In the social housing sector in particular, there could also be further opportunities to align activities and ensure timely smart meter installations when properties become void or where there are planned heating system upgrades.

Consultation Questions:

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

Yes

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

We agree that the terminology should be updated to clarify that the 2015 regulations apply to smart meters. The sections on appointments and faulty meters are of particular importance given that the continuing roll out of smart meters will require additional activity on first installations and ongoing support in resolving technical issues giving the more complex infrastructure and commissioning requirements when compared to traditional meters.

Smart meter installation appointment availability

3. 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?

Yes. However, there must also be assurances that the installation will be successful rather than focussing only on the timescale for the appointment.

4. Do you agree that six weeks is an achievable timeframe to meet?

Yes. However, it may be useful to set out circumstances where appointments should be prioritised and potentially delivered within a shorter timescales (e.g. Priority Services Register customers).

5. Do you agree this should apply to new/first time smart meter appointments only?

If an existing smart meter is not working correctly and requires a further engineer appointment, this should also be delivered within a reasonable timeframe. We note that the consultation proposes a 90 day window for resolving such cases however this is a considerable length of time during which the customer could be experiencing detriment, particularly if impacting on billing, access to tariff and awareness of energy use.

6. 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?

If the obligations on appointment timescales are only to apply to consumers who are 'technically eligible' for an installation, it is unclear how further progress will be made in more complex cases where solutions are not yet available. We have seen various examples of this as part of the Radio Teleswitch Service shutdown, with customers requesting smart meter installations but then being told there are no suitable meters available, primarily due to the lack of WAN coverage.

We note that other solutions are being developed, including options for a temporary pre-programmed smart meter which is not operating in smart mode. If the customer has made contact to request a smart meter, the supplier must offer additional information on the alternatives. While the pre-programmed options may not be a 'working' solution, it would at least allow progress and temporary solutions rather than requiring the customer to restart the engagement process at a later date.

7. Are there any other exemptions that should be considered with this standard?

n/a

8. 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?

Yes

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

While the focus here is on the experience of individual domestic customers, feedback from our members has highlighted the poor experiences of social landlords who have also been involved in facilitating the smart meter rollout. While tenants are free to choose their own energy suppliers and make decisions on the installation of smart meters, when properties become vacant, housing associations can take on the responsibility of the supply during the void period. This offers an opportunity for the social landlord to liaise with the suppliers and arrange for a smart meter to be installed. This has benefits for both parties in terms of increasing the rate of smart meter installations, overcoming the challenges of engaging with individual customers, and improving efficiencies down the line (e.g. remote account management for future tenancy changes).

For this process to work effectively, the energy supplier timescales for installation must also align with void turnaround times. Based on the most recent data for 2023/24¹, this takes an average of 39 days. However, our members have been experiencing significant delays in recent years, with delays to meter installations being one of the key reasons cited. By comparison, void turnaround times were 26 days on average in 2019/20. In either case, from discussions at our recent workshop with social landlords and energy suppliers there was a call for an expedited route for meter installations in vacant social housing. While financial penalties may offer some incentive, we would like to see this coupled with further action to ensure social landlords can also access timely appointments.

Similar principles should also apply for social housing retrofit programmes where there is a need to align Smart Meter installations with clean heating upgrades for example. Given Smart Meters are necessary for accessing Time of Use tariffs and supporting particular technologies, delays to appointments and failed installations could lead to significant detriment to social tenants if they are unable to access the most cost effective tariffs for their home.

Smart meter installation failures

10. 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.

¹ <https://www.housingregulator.gov.scot/landlord-performance/national-reports/national-reports-on-the-scottish-social-housing-charter/national-report-on-the-scottish-social-housing-charter-headline-findings-2023-2024/>

It may also be the case that technical challenges are not apparent until the installation attempt. Would these circumstances still result in compensation if there is a failed installation (as per Question 10) or would they be considered exempt if the reason for the failed installation is that the customer is not technically eligible?

11. Are there any scenarios within an energy supplier's control leading to failed smart meter installations that have not been covered?

n/a

12. Do you agree this should be applicable to both first time and replacement smart meter appointments?

Yes.

13. Do you agree there should be no restrictions on the number of times a consumer could receive this compensation?

Yes.

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

n/a

Investigating smart meter operational issues

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

n/a

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

n/a

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

n/a

Smart meters not operating in smart mode

18. 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?

Yes.

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

n/a

20. 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

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

n/a

22. Do you agree that 90 days is an appropriate timeframe to resolve smart meters not operating in smart mode in the future?

As noted in Q5, the 90 day timeframe for resolving such cases is a considerable length of time during which the customer could be experiencing detriment, particularly if impacting on billing and access to tariffs. As noted in the consultation, consumers should not have to wait a substantial amount of time for suppliers to resolve these types of issues. Ofgem should explore have a shorter timeframes for priority issues.

23. Do you agree consumers should receive compensation for both gas and electricity meters if applicable?

Yes.

24. 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?

This proposal will not incentivise to resolve issues quickly and could leave consumers without working meters for considerable lengths of time if the further compensation payments will only be triggers on an annual basis.

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

n/a

Non-domestic

26. Do you agree that the proposals under consideration in this consultation are beneficial for non-domestic consumers?

n/a

27. 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?

n/a

28. 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

29. 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

30. Do you agree that the compensation amount for the Guaranteed Standards under consideration could be further tailored to the non-domestic sector?

n/a

31. 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

32. Do you have any other considerations to determine the compensation amount for non-domestic consumers?

n/a