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Dear Graeme,

**Smart meter guaranteed standards: Supplier Guaranteed Standards of Performance**

Thank you for the opportunity to respond to the consultation. TotalEnergies Gas and Power are a non-domestic only supplier who are strongly opposed to the extension of the smart meter Guaranteed Standards of Performance (GSoP) to the non-domestic market. We see multiple issues from a practical and operational perspective, it goes against the Government's policy of reducing red tape and financial burden on customers which impacts the UK’s competitiveness, and it will not deliver any of the expected benefits.

Non-domestic suppliers have existing regulations covering this area and powerful commercial and customer experience drivers to get as many smart meter installations as possible and ensure they work. We do not see what the GSoP’s will add, apart from additional costs for customers.

The inclusion of the non-domestic within the consultation seems an afterthought, no differences of the non-domestic market seem to have been considered. Also, the domestic suppliers have engaged with DESNZ and Ofgem we understand for around a year, yet this is the first communication about non-domestic.

I would be happy to discuss any of the matters we raise in this response.

Yours sincerely,

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Andrew Jones

Head of Regulation

TotalEnergies Gas & Power

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

For the non-domestic market, the 2015 regulations should not be updated. The proposed Guaranteed Standards of Performance have been written with the domestic market in mind and not for how the non-domestic market operates. There are a multitude of issues for introducing the proposed GSoPs into the non-domestic market and they are stated in the answers to Q’s 4, 9, 11, 13 and 18 as well as in Q1.

There are existing regulations, the new and replacement obligation and the operational licence condition (49), which are already regulated in these areas. This is duplication at a point when regulators are being asked by the government to reduce regulatory burden on suppliers to reduce energy bills to help Britain be competitive and grow.

Over the last 2 years TotalEnergies has met it’s rollout obligations and has prioritised maximising operational meters. A traditional meter or a non-working meter causes higher volumes of complaints, expensive meter reads when we already pay the DCC to support the meters, settlement and billing issues and costly operational work particularly in the field. We do not need extra costly incentives that customers will have to pay to install and operate remotely SMETS or advanced meters.

Over the summer of 2025 non-domestic suppliers are anticipating having some field staff shortages for dealing with business as usual smart metering work. This is due resources moving to support the proposed RTS wind down plan and have metering installers ready to deal with emergency heating and hot water situations. How the GSoP obligations would work during periods of other prioritisations is an area that has to be addressed We could easily see situations where at short notice we as an industry are notified of 2G switch offs in certain geographies and have to ensure the impact is minimised on customers. It is not impossible changes to metering are required in future to customers with Solar, Batteries or EVs to support the government’s net-zero aims and they are to be prioritised over other work.

The domestic market has been involved in conversations on this subject for a year, not so non-domestic suppliers. It therefore seems only an afterthought to include non-domestic customers, as we have not been provided the opportunity s to lay out the issues and concerns prior to the consultation all have to be raised now without discussion.

In the non-domestic market costs are not controlled by the price cap. So the new costs for managing the new obligations and provided to customers will just raise customer costs across the non-domestic market for no additional benefit. Our understanding is Ofgem should be reducing red tape and costs that impact the UKs economic effectiveness.

As a non-domestic only supplier, we can’t answer for the domestic market.

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

We answered no to Q1. The 2015 regulations should not be updated for non-domestic customers.

**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?**

This is not applicable to non-domestic suppliers for a number of reasons. One of the key reasons is that many non-domestic customers want installations more than 30 days into the future due to the need to have the powercut as part of the installation. Another reasons is that many customers in the non-domestic market ask for out-of-hours work to ensure their business is unaffected by the rollout, which suppliers only have a limited resource availability that quickly gets filled up. Not to repeat all the points in Q4, please refer to that for more details.

**Q4. Do you agree that six weeks is an achievable timeframe to meet?**

There are a number of scenarios where this is not achievable.

* The site is remote, we have seen from the RTS closedown that there are difficult sites to schedule, and its not feasible for smaller suppliers to have installers permanently based in remote locations for such small amounts of work.
* A business with many (hundreds or thousands) of sites may decide to have all their meters replaced, and such a spike in work would overwhelm the available resources.
* A business may require an out-of-hour installation, so it does not impact on their operations. These take time to schedule due to the limited availability of this type of installation.
* Business customers can choose their own metering agents and suppliers have little to no leverage in the relationship between the two parties.
* Non-domestic gas customers with larger meters may require site surveys, pressure tier checks, pre-fabrication of pipes/parts and replacement meters may have longer lead times and six weeks is just not achievable.
* Gas meter set ups can also be complex with legacy installations and ancillary equipment, of which installers are unaware until the site visit, inevitably causing further installation delays.
* There are fears that smaller suppliers will not get the required resources to meet the obligation given metering companies may prioritise the needs of larger suppliers who provide them with a higher % of their revenue.
* Suppliers may have other priorities, which are out of their control, over the course of the next few years, such as a 2G switch off being announced at short notice, and priority needing to be given to maintaining the existing sites. A little like suppliers have experienced with the RTS switch off.
* In the non-domestic market there are sites which take a long time to organise access; unmanned remote sites, those with significant safety issues such as alongside railway lines, security considerations like MOD sites and airports, and multiple other considerations that are not in the domestic market.

**Q5. Do you agree this should apply to new/first time smart meter appointments only**?

This should not apply to either new or first time smart meter appointments in the non-domestic market.

**Q6. 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?**

We are opposed to this applying in all cases, or just technically eligible.

**Q7. Are there any other exemptions that should be considered with this standard?**

For non-domestic sites, for all of the reasons outlined in Q’s 1 & 4.

**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?**

Particularly for business sites there are scenarios, as laid out in Q4, that will mean some customers and particularly TPIs could start using the process as a revenue scheme, and raising the costs other customers will have to pay.

**Q9. Are there any other factors not clearly outlined you think need to be considered?**

In the non-domestic market suppliers are not obligated to offer every customer a contract. Raising the regulatory risk for dealing with some customers in particularly remote situations, it could lead to them from being excluded from the more competitive elements of the market.

**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?**

We do not agree for the non-domestic market. Non-domestic suppliers have enough incentives to get an installation right and working as soon as possible. It adds costs, complaints, billing and settlement issues not having a smart meter installed and working properly.

It creates new regulatory risks for sites in remote situations, non-domestic customers can choose their own metering agents, with suppliers having little control on what happens on site. Additional costs of monitoring and providing GSoP payments that will just add to other customers’ bills without solving any problems, is something that goes against the government ambition to reduce regulation and customer bills to help make the UK more competitive.

Non-domestic sites have more complexity on average than in the domestic market, needing more technically difficult solutions which take time to understand and organise.

We have seen in the industry multiple situations in the RTS closedown where power supply's multiple buildings and customers within the wiring set up. RTS has clearly shown this can be an issue, but it's not only RTS sites where this will be found.

**Q11. Are there any scenarios within an energy suppliers’ control leading to failed smart meter installations that have not been covered?**

Poor industry data. In the non-domestic market the prevalence of diverse metering arrangements on site is much higher than in the domestic market. Examples include single phase whole current, 3 phase whole current, CT meters, U6, U16 etc. In the domestic market the vast majority are single phase whole current. We can only rely on the industry data we are provided in industry flows when determining which engineer to go to which sites with which metering equipment. If the industry data we received is poor it seems unfair to blame the supplier who finds this out and then cleans it.

This is not within the suppliers control, but is not a scenario discussed. In the non-domestic market customers can have direct relationships with metering agents, and the supplier can have nothing to do with the interactions until they receive a dataflow once the job is completed.

**Q12. Do you agree this should be applicable to both first time and replacement smart meter appointments?**

We do not agree this should be applicable to either scenario for non-domestic customers.

**Q13. Do you agree there should be no restrictions on the number of times a consumer could receive this compensation?**

We are worried the main beneficiaries of any new GSoP in the non-domestic market will be TPIs. If TPIs spot an opportunity to create a new revenue scheme for themselves, they will create a re-occurring raising of an issue for sites with no easy fix. This will create a limited income for consumers, but a steady new one for TPIs who could take a cut in the money, which then has to be recovered from the wider customer base.

**Q14. Are there any other factors not clearly outlined you think need to be considered?**

There are many of the high-level issues outlined in Q1, such as in the non-domestic market costs are not controlled by the price cap. So, the new costs for managing the new obligations will just raise customer costs across the non-domestic market for no additional benefit. Our understanding is Ofgem should be reducing red tape and costs that impact the UKs economic effectiveness.

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

No, we do not. We suspect in the non-domestic market the main beneficiaries will be TPIs. We have been working hard in the recent past to improve our installation rates, as we can concentrate on quality not quantity of installations, given we have reached our annual installation targets.

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

We do not install or operate prepayment meters, so this is not a question we can answer.

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

We have nothing else to add at this time.

**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?**

We do not believe it is right for consumers. When we think about consumers we have to think about all consumers, and not just those directly impacted by the GSoP. The system changes and monitoring across metering agents and suppliers will add costs to non-domestic customer bills, as will the GSoP payments, many of which may go to TPIs in some form.

Over the last 2 years TotalEnergies has met its rollout obligations and has prioritised maximising operational meters. A traditional meter or a non-working meter causes higher volumes of complaints, expensive meter reads when we already pay the DCC to support the meters, settlement and billing issues and operational work for our expensive field staff. We do not need extra incentives to install and operate remotely SMETS or advanced meters. If we can fix issues within our control we will, we don’t need a punitive obligation for this to be the reality.

In the non-domestic market customers can choose their own metering agents. The supplier has little or no control over the relationship in these circumstances and usually only find out if activity is happening on site by dataflows updating information post successful work having taken place.

We also see a risk that metering companies will prioritise the work of larger suppliers, meaning smaller suppliers are only able to offer a reduced service to their customers and have to pay high GSoP payments.

In the non-domestic market there are sites which take a long time to organise access; unmanned remote sites, those with significant safety issues such as alongside railway lines, security considerations like MOD sites, airports and multiple other considerations that are not in the domestic market.

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

This does not consider the situation of customers in the non-domestic market being able to select their own metering agents.

It also creates situations where customers in remote areas may be priced out of the best non-domestic deals in the market as suppliers should build location risk into their pricing. We have seen with RTS that there are some very remote sites which are very expensive and time consuming to support, we are happy to do so under the present regulatory framework even though we can choose which customers to offer contracts to, but new red tape obligations like this may alter the situation.

**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?**

We do not believe SMETS or Advanced Meters in the non-domestic market should be included in this proposal.

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

The 2G rollout is an interesting point, it is out of the supplier’s hands. The industry has been told the 2G technology is already degrading over time as 4G and 5G are prioritised for investment and maintenance and that some areas will have been 2G communication coverage then 4G.

There are situations where meters are located deep in basements or faraday cages, where nothing but PLC communications, as used in other rollouts, will solve.

**Q22. Do you agree that 90 days is an appropriate timeframe to resolve smart meters not operating in smart mode in the future?**

In the non-domestic market there are sites which take a long time to organise access; unmanned remote sites, those with significant safety issues such as alongside railway lines, security processes like MOD sites and multiple other considerations that are not in the domestic market.

Some smart gas meters in the non-domestic market are in separate areas to the smart electric meters and comms hubs, albeit within the same building. Ensuring these smart meters will operate in smart mode will take a long time to organise. Additionally, if the gas smart meter is not working due to a hot shoe, and the electricity meter is not smart and with another supplier, we have no influence over the timeframe for the electric meter being exchanged and may not be notified by the customer once it has.

We also see a risk that metering companies will prioritise work of larger suppliers, meaning smaller suppliers are only able to offer a reduced service to their customers and must pay high GSoP payments.

**Q23. Do you agree consumers should receive compensation for both gas and electricity meters if applicable?**

We contract customers by fuel and so don’t link accounts as contracts for fuels are often different. So, our data linking dual fuel is limited.

**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?**

How does this work where the meter operator is chosen by the customer and not the supplier? Also, where the meter was working and it no longer is due to 2G issues, but no 4G signal? There are well documented issues, especially in Scotland where the DCC coverage mapper shows it should be fine to install a smart meter, but the signal is not strong enough with the most common issue being unable to commission the meter.

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

We have covered the matters we have understood so far.

**Q26. Do you agree that the proposals under consideration in this consultation are beneficial for non-domestic consumers?**

For the reasons outlined throughout the consultation response we do not believe these are suitable for non-domestic consumers, indeed they will create new problems and costs for them.

**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?**

In no way do we agree with the rationale or proposed scope for the non-domestic sector and they should be excluded from any new obligations. This is a set of obligations made for the domestic sector and as an afterthought tried to be extended to a market they were not designed for. The domestic market has had 12 months of discussions on these GSoPs and the non-domestics none.

**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 nondomestic sector that we should consider?**

We don’t understand what benefits there would be for the non-domestic sector. The risks include:

* There are existing regulations on suppliers, the new and replacement obligation and the operational licence condition (49) which are already regulating these areas. This is duplication at a point when regulators are being asked by the government to reduce regulatory burden on suppliers to reduce energy bills to help Britain be competitive and grow.
* Over the last 2 years TotalEnergies has met their rollout obligations and has prioritised maximising operational meters. A traditional meter or a non-working meter causes higher volumes of complaints, expensive meter reads, when we already pay the DCC to support the meters, settlement and billing issues and operational work for our expensive field staff. We do not need extra costly incentives that customers will have to pay to install and operate remotely SMETS or advanced meters.
* We are likely over the summer of 2025 to have some field staff resource issues for business as normal smart metering work as we need to support the proposed RTS wind down plan and have metering installers ready to deal with emergency heating and hot water situations. How the GSoP obligations would work during periods of other prioritizations is another thing that has to be looked at. We could easily see situations where at short notice we as an industry are notified of 2G switch offs in certain geographies and must ensure the impact is minimized on customers. It is not impossible changes to metering are required in future to customers with Solar, Batteries or EVs to support the government’s net-zero aims and they are to be prioritized over other work.
* The domestic market has been involved in conversations on this subject for a year, it seems only an afterthought to include non-domestic customers which has provided no opportunity for us to lay out the issues and concerns prior to the consultation.
* In the non-domestic market costs are not controlled by the price cap. So, the new costs for managing the new obligations and provided to customers will just raise customer costs across the non-domestic market for no additional benefit. Our understanding is Ofgem should be reducing red tape and costs that impact the UKs economic effectiveness.
* The site is remote, we have seen from the RTS closedown that there are difficult sites to schedule, and it’s not feasible for smaller suppliers to have installers permanently based in remote locations for such small amounts of work.
* A business with many (hundreds or thousands) of sites may decide to have all their meters replaced, and such a spike in work would overwhelm the available resources.
* A business may require an out-of-hour installation, so it does not impact on their operations. These take time to schedule due to the limited availability of this type of installation.
* Business customers can choose their own metering agents and suppliers have little to no leverage on the relationship between the two parties.
* There are fears that smaller suppliers will not get the required resources to meet the obligation given metering companies may prioritise the needs of larger suppliers who provide them with a higher % of their revenue.
* Suppliers may have other priorities, which are out of their control, over the course of the next few years, such as a 2G switch off being announced at short notice, and priority needing to be given to maintaining the existing sites. A little like suppliers have experienced with the RTS switch off.
* In the non-domestic market there are sites which take a long time to organise access; unmanned remote sites, those with significant safety issues such as alongside railway lines, security considerations like MOD sites and multiple other considerations that are not in the domestic market.
* Particularly for business sites there are scenarios it will mean some customers and particularly TPIs could start using the process as a revenue scheme, and raising the costs other customers will have to pay.
* In the non-domestic market suppliers are not obligated to offer every customer a contract. Raising the regulatory risk for dealing with some customers in particularly remote situations could lead them from being excluded from the more competitive elements of the market.
* Poor industry data. In the non-domestic market the prevalence of diverse metering arrangements on site is much higher than in the domestic market. For example, single phase whole current, 3 phase whole current, CT meters, U6, U16 etc. In the domestic market the vast majority are single phase whole current. We can only rely on the industry data we are provided in industry flows when determining which engineer to go to which sites with which metering equipment. If the industry data we received is poor it seems unfair to blame the supplier who finds this out and then cleans it.
* We are worried the main beneficiaries of any new GSoP in the non-domestic market will be TPIs. If TPIs spot an opportunity to create a new revenue scheme for themselves they will create a re-occurring raising of an issue for sites with no easy fix. This will create a limited income for consumers, but a steady new one for TPIs who could take a cut of the money, which then has to be recovered from the wider customer base.
* Non-domestic sites have more complexity on average than in the domestic market, needing more technically difficult solutions which take time to understand and organise.
* We have seen in the industry multiple situations in the RTS closedown where power supply's multiple buildings and customers within the wiring set up. RTS has clearly shown this can be an issue, but it's not only RTS sites where this will be found.

**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?**

We do not agree

**Q30. Do you agree that the compensation amount for the Guaranteed Standards under consideration could be further tailored to the non-domestic sector?**

No, it should not. It will just create a revenue stream for TPIs. Also, the costs will just be added to other non-domestic customers.

**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?**

Neither option is suitable, the higher the charge the more TPIs can take and the more energy bills for customers will rise. We are meant to be reducing energy bills, not finding new opportunities to raise them.

**Q32. Do you have any other considerations to determine the compensation amount for non-domestic consumers?**

The non-domestic market has prevalent TPI participation, whilst this has many advantages for customers and the market, it may also be a way for them to make additional revenue at the expense of suppliers and other customers who will have to cover the costs.