

Smart Metering Team

Ofgem

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Dear Smart Metering Team,

Thank you for the opportunity to provide feedback on the consultation regarding the Smart Meter Guaranteed Standards: Supplier Guaranteed Standards of Performance. After reviewing the proposals, we would like to share our comments.

100Green supports actions aimed at improving the energy market and delivering benefits to all consumers in both domestic and non-domestic markets—and especially to those in vulnerable situations.

We would like to reiterate our concerns about the growing regulatory burden on us. The impact of increased oversight, stricter obligations, and new requirements is driving up operational costs. While we support efforts to improve the market and protect consumers—especially those in vulnerable situations—we believe the current approach lacks sufficient engagement with the concerns we have raised. A more balanced and collaborative process is essential to achieving fair and sustainable outcomes for all parties.

Below is a summary of our position in response to this consultation. While we may not have responded directly to each individual question, our feedback is provided within the overall framework of the consultation.

We look forward to continuing a constructive dialogue aimed at improving the energy system for all consumers and particularly for those in vulnerable situations.

Yours sincerely,

Antonis Lamaj,

Energy Regulation & Compliance Manager

A handwritten signature in black ink, appearing to read "Antonis Lamaj", with a stylized flourish extending to the right.

1. Smart Meter Guaranteed Standard Proposals

In response to the questions in this section, we agree that a review of the 2015 regulations is necessary. With the Smart Meter Rollout Phase ending on 31 December 2025, it is important that the regulatory framework is updated to reflect the current metering landscape. Since 2015, the energy sector has undergone significant transformation, and smart metering now plays a vital role in enabling a more efficient, responsive, and customer-focused energy system.

From an energy supplier perspective, we encourage Ofgem to focus on the following key areas when updating the regulations:

- **Definitions and terminology:** Clear and consistent definitions of smart meters and associated technologies are needed to remove ambiguity and ensure alignment across the industry.
- **Wider responsibility for smart meter rollout:** We believe the obligation to install smart meters should not rest solely with suppliers. If the goal is to achieve full smart meter coverage across Great Britain and meet the Government's targets, we strongly encourage Ofgem to involve additional stakeholders in the rollout process.
- **Customer engagement and interaction:** The regulations should reflect the unique aspects of smart meter installation and maintenance, including remote support options and the importance of obtaining informed customer consent for remote operations. We also urge Ofgem to consider a more balanced approach when evaluating supplier performance in relation to customer engagement. In many cases, despite our best efforts to inform and support customers, engagement levels may fall short due to factors outside our control. Greater collaboration across the industry is needed to rebuild trust and foster stronger consumer participation.

We believe a modernised, collaborative and smart approach to regulation will better support the successful adoption of smart metering and deliver long-term benefits to all consumers.

2. Smart Meter Installation Appointment Availability

We support the principle of improving access to smart meter installation appointments, as timely availability plays a key role in building consumer trust and encouraging engagement. However, we encourage Ofgem to ensure that any new standards introduced are both practical and reflective of the operational challenges faced by us.

While a six-week timeframe may be achievable in many instances, it does not always align with real-world conditions—particularly in rural and remote areas where the availability of qualified engineers is limited. Geographic disparities, seasonal fluctuations in demand, and ongoing supply chain constraints must be taken into account when determining feasible expectations across the industry.

We agree that any appointment availability standard should apply specifically to new or first-time smart meter installations where the consumer is technically eligible. Eligibility should consider factors such as meter type, property location, safety conditions, and communications network coverage. Additionally, exemptions should be made for

circumstances in which customers are unresponsive, cancel appointments repeatedly, or where access issues or third-party infrastructure limitations make timely installation unfeasible.

Regarding compensation, while we acknowledge the intent to ensure accountability, we believe any scheme should be applied with care and proportionality. Compensation should not be automatic or recurring without a fair assessment of the reasons for delay, particularly when delays result from factors outside our control. We encourage Ofgem to take a balanced approach that promotes consumer protection while also recognising operational realities and the importance of shared responsibility in achieving rollout targets.

3. Smart Meter Installation Failures

As a supplier, we understand that consumers should be compensated when a smart meter installation fails because of something that is our fault. This promotes accountability and helps improve service. However, compensation rules need to be clearly defined and should only apply when the failure is genuine our responsibility. This is essential to ensure fairness.

There are many situations that are outside our control and can lead to a failed installation. These include cases where customers give incorrect information, are not at home, cancel at the last minute, require DNO work to be carried out or other common issues across the industry.

We believe compensation rules should apply only to first-time installations. Replacement smart meter appointments are often more complicated and may involve technical issues, system upgrades, or compatibility problems that can cause delays. These challenges should be recognised, and a more balanced approach is needed.

When it comes to how often compensation should be paid, we think a fair and balanced approach is necessary. While it's important to protect consumers, unlimited compensation could lead to misuse—especially when delays are caused by customer actions.

Finally, external factors like extreme weather, third-party infrastructure and safety issues around existing installations can also prevent installations from going ahead. It's important that we are given the chance to show what actions were taken to fix the issue prior to any engagement by Ofgem.

4. Investigating Smart Meter Operational Issues

As an energy supplier, we understand the importance of supporting customers who experience problems with their smart meters or in-home displays. Providing clear and timely support helps build trust and confidence in the smart meter rollout. However, any new or updated standards must be practical, proportionate, and should not introduce additional obligations that place unreasonable pressure on us. It is essential that these standards reflect the wide range of technical issues that can occur, and the challenges involved in resolving them.

We believe that building on the existing “Faulty meter” and “Faulty prepayment meter” standards could be a sensible step, as long as it avoids creating confusion or overlap with current requirements. Clear definitions of what constitutes a fault—and where responsibility lies—are vital, especially in cases involving third-party communications infrastructure, network faults, or user-related issues that are not within our control.

There are also important practical factors that must be taken into account. Smart meter and IHD faults are not always easy to diagnose, especially when problems are intermittent or not visible remotely. In some cases, engineer visits may be needed, and this can be challenging in rural or remote areas where availability is limited. These real-world scenarios must be considered when setting expectations for response times and resolutions.

Finally, with smart technologies continuing to evolve, any new standards must be flexible and future-proof to avoid becoming quickly outdated or adding unnecessary burden.

5. Smart Meters Not Operating in Smart Mode

We support the goal of smart meters, which are meant to provide consumers with better billing accuracy and improved energy management. However, any new compensation system needs to be fair, targeted, and realistic, considering the operational challenges of the smart meter system, including factors beyond our control.

We agree that compensation may be necessary if a smart meter fails to work in smart mode due to an issue we can control. But it's important that the system clearly separates faults that are our responsibility from those caused by third parties or external factors. This will ensure that the rules are fair and that we are not unfairly penalised for things outside of our control.

We agree with the proposed “in scope” and “out of scope” categories, as long as the definitions are clear and based on what we can reasonably detect and fix. The system must be straightforward to avoid confusion and ensure that responsibility is assigned correctly.

We also support clear definitions of what a “smart meter” is and what it means for it to be “not operating in smart mode.” These definitions should focus on the meter’s core functions, like sending automatic readings and supporting time-of-use tariffs, instead of things like the consumer’s tariff type or additional services.

It’s also important that “actions of another party” are clearly defined. This should cover problems caused by entities like the DCC, WAN providers, manufacturers, or even consumer-related issues, such as tampering or difficulty accessing the meter. We should be able to provide evidence when the issue falls outside of our control.

We also believe that Ofgem should be proactive in seeking assurances from MEMs, while we recognise that suppliers are the licensed entity it is a well-known facet of the market that MEMs are responsible for physical accessing and installing/ commissioning/ repairing/ replacing the meter. Ofgem penalising suppliers for the performance of their MEM is an outdated regulatory technique and favours larger suppliers whose contracts are more important to a small number of MEMs who are working for multiple suppliers. Ofgem reviewing the performance of MEMs across the board and engaging with them directly

around performance issues would seem to us to be a more progressive regulatory technique.

The proposed 90-day resolution timeframe for smart meters not working in smart mode seems reasonable, as long as it starts when we identify or are notified of the issue, rather than retroactively. We also believe this timeframe should be flexible for complicated cases or situations where access to the property is restricted, as long as we can justify and document the delay.

We agree that consumers should receive compensation for both gas and electricity meters if both are affected. However, the compensation system should be carefully structured to avoid paying multiple times for the same issue and should reflect the actual inconvenience experienced by the consumer.

We understand the logic behind recurring compensation payments if an issue is unresolved for a long time, such as after 365 days.

Lastly, there are a few other things that we encourage Ofgem to consider in the final proposal. These include clear communication by consumers about the status of their smart meter, a transparent process for resolving disputes by everyone involved and targeted public education on how smart meters work and basic troubleshooting.

6. Non-Domestic

From our point of view, we recognise that the proposals being considered have the potential to benefit non-domestic consumers by offering greater certainty and reliability in services like smart meter installations, functionality, and issue resolution. Clearer standards would help businesses avoid unnecessary disruptions and improve their interactions with energy suppliers. However, it's important to acknowledge that implementing such standards comes with operational challenges for us. We must be able to meet these expectations across a broad range of non-domestic consumers, and a balanced approach is essential to prevent unrealistic burdens on suppliers or operational inefficiencies.

We also understand the rationale behind extending Guaranteed Standards to the non-domestic sector but believe the proposed scope should be carefully reviewed. Given that non-domestic consumers vary greatly in terms of business size, meter type, and energy complexity, a one-size-fits-all approach may not always be effective. Large enterprises with more complex energy needs may require more specialised solutions and longer resolution times than small businesses. Additionally, certain meter types might present specific technical challenges that could affect the ability to meet resolution timelines. Therefore, it is critical to incorporate flexibility within the framework based on the diversity of non-domestic consumers to ensure that the standards are practical and achievable for all.

The proposals present an opportunity to enhance the reliability and accountability of energy supply to non-domestic consumers, but we must consider the variety of operational needs these businesses have. Non-domestic customers are typically far more concerned about the prospect of powering down to allow for smart installations and it would seem unfair to penalise a supplier for attempting to accommodate the customers wishes. Non-domestic consumers often operate under different working hours, may have specialised energy needs, and may be located in remote areas where access can be limited. These

variations could make it difficult to comply with rigid timelines. It is essential to ensure that the Guaranteed Standards are flexible enough to accommodate these differences. A tailored approach that addresses these unique challenges will be key to the success of the proposed standards.

To better align the Guaranteed Standards with the needs of non-domestic consumers, we encourage Ofgem to consider the following adjustments.

- First, the timeframe for resolving issues should be flexible and based on business size, energy complexity, and meter type. Large businesses with intricate energy systems may need more time to resolve operational issues, while smaller businesses might benefit from quicker resolutions.
- Second, the proposed Guaranteed Standard for smart meter installation appointment availability is important, but we recommend that these appointments be flexible to account for the wide range of non-domestic business operations. Some businesses may only be able to accommodate installations outside regular hours, and this flexibility should be considered.

Moreover, we agree that extending the Guaranteed Standards to cover issues that are under our control for non-domestic consumers is important. However, the compensation or mitigation for such failures should take into account the scale of the business and its reliance on continuous operations. For smaller businesses, a failed installation may cause greater disruption than for larger companies with backup systems. Additionally, for some meter types or technical issues, there may be challenges in resolving issues within standard timeframes, especially for complex or older installations. It would be beneficial if the framework allowed for appropriate leeway in such cases, with clear communication about the reasons for delays.

7. Non-Domestic Guaranteed Standard compensation value

When considering compensation frameworks for the non-domestic sector, it is important to highlight a number of real-world operational challenges and risks that we may face. The non-domestic market is highly diverse, covering a wide range of business types, meter configurations, and energy usage profiles—from small shops to large industrial sites. This diversity creates complexities that a single, uniform compensation approach may struggle to accommodate effectively.

One key challenge is that non-domestic installations often require specialist engineering expertise, access permissions, and coordination with business operations, which may include shutting down critical equipment. In such scenarios, installation delays or failures could arise from factors outside our control, such as health and safety restrictions, restricted site access, or unavailable business personnel. These complexities may lead to disputes about the cause of a service failure and whether compensation is applicable.

In addition, high-volume portfolio customers—such as facilities management companies or franchises—may expect consolidated reporting and bulk handling of compensation claims, which introduces additional administrative burdens for us. Meanwhile, smaller non-domestic customers might require more tailored support or experience disproportionately high impacts from even brief service disruptions, complicating any universal compensation model.

Further, if compensation levels were to scale with energy spend or operational impact, we would need access to detailed and up-to-date customer usage profiles and business impact assessments, which are not always readily available or practical to obtain at short notice. This could create disputes over eligibility or fairness and result in delays or inaccuracies in compensation processing.

The proposal to extend GSOPs into the commercial market may be perceived as a regulatory marketing initiative rather than a response to identified systemic service gaps. Applying domestic-style standards to a fundamentally different market may result in increased costs for everyone involved, administrative burdens for us and potentially customer dissatisfaction without necessarily improving customer outcomes.