**SMART METER GUARANTEED STANDARDS: SUPPLIER GUARANTEED STANDARDS OF PERFORMANCE**

**CONSULTATION RESPONSE TO OFGEM ON SUPPLIER GUARANTEED STANDARDS OF PERFORMANCE FROM SICAB**

Shetland Islands Citizens Advice Bureau (SICAB) have received the Ofgem consultation on new Guaranteed Standards of Performance for specific elements of the smart meter consumer experience and would like to offer our views on the questions asked in the document.

Q1. SICAB welcome the update to the 2015 regulations in that they now specifically mention smart meters but think that they still fall short of recognising the current metering landscape in rural and remote locations like ours and being able to access a smart meter.

Q2. We consider that the four key aspects that are described in part 2 paragraph 17 of the consultation document are equally important in the updating process. Consumers must have energy suppliers who are able to install and operate meters properly, investigate and address issues for their customers in a timely manner and provide adequate compensation when this does not happen for their customers. Consumers should also not be penalised for where they live and the prolonged connectivity issues that they experience.

Q3. Whilst SICAB agree, in principle, that a new standard to ensure requests for smart meter installation appointments are fulfilled within a set number of weeks is right for consumers, we are concerned that this may lead to smart meters being installed quickly in homes, regardless of connectivity issues, and then being, in effect, dumb meters. We also do not think that £40 compensation is enough for having to endure 90 days plus of estimated billing and waiting on your energy supplier to return and sort out the connectivity issue. SICAB are aware of smart meter engineer appointments being arranged but either then cancelled at short notice or installation not being possible due to various reasons, including connectivity.

Q4. Whilst SICAB recognise that six weeks should be an achievable timeframe to meet, experience has shown us that it is taking far longer to not only arrange the initial appointment with customer to get a smart meter fitted but when there are metering and connectivity issues it is delaying the whole process, especially in rural areas where booking ferries, accommodation etc. have to be factored in too.

Q5. SICAB do not agree that any changes to the regulations should only apply to new or first time smart meter appointments only as this will have the capacity to leave a swathe of customers with smart metering issues left behind whilst energy companies concentrate in getting initial appointments and installations done first. A customer with a smart metering issue should be just as important as a new installation situation.

Q6. SICAB do not agree that any changes to the regulations should only apply in cases where a consumer is technically eligible to have a smart meter installed. SICAB feel that the term “technically eligible” is too ambiguous and needs careful clarification. The fact that an energy company does not already have the technical ability to fit a smart meter should not rest on the shoulders of the consumer. This would then also create a second tier of customer to the energy suppliers who would concentrate on easy and straightforward installations.

Q7. Constant non-connectivity areas in remote and rural locations must be taken into account in the changes to the regulations to ensure that no consumer is left behind in the smart meter roll out just because of where they live. What provision of urgency will be considered if customers are off-supply for whatever reason.

Q8. SICAB agree that consumers should be able to receive compensation every six weeks should a supplier not be able to offer an appointment in the proposed time frame.

Q9. SICAB would again like to highlight the concern about the statement that was included in the **PROPOSED OFGEM POLICY OUTCOMES** regarding the fact that there will be no obligation on suppliers to provide electricity to consumers with an RTS meter after the cessation of support for RTS meters. Does this mean that consumers still awaiting help from their energy companies regarding their metering and smart meter issues will just be told that their supplier is giving up on them. Where are the regulations to ensure that does not happen?

Q10. SICAB are not sure that 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 as this could give leeway to energy suppliers saying that it is beyond their control and not doing anything further for their customer. It is critical that OFGEM must ensure that regardless of failure of installation that compensation must be paid to stop “grey areas of fault”.

Q11. As connectivity issues along with metering problems are a big problem in our locality, what evidence is required by regulatory bodies to ensure that energy suppliers are coming up with the technology required to counter this?

Q12. SICAB agree that any changes in regulations should be applicable to both first time and replacement smart meter appointments.

Q13. SICAB think that there should be no restrictions on the number of times a consumer could receive the regulated compensation as this would surely trigger energy companies to ensure that they dealt with smart meter installations and issues in a timely manner. Such payments should be viewed as a warning for suppliers to get these cases dealt with quicker.

Q14. SICAB feel that energy suppliers should be open and highlighting what they are doing to help customers with connectivity and metering issues along with the offering of any compensation. It is difficult for consumers to access information regarding this on any energy supplier’s websites or to be offered it when contacting the supplier themselves. Information should be transparent and all communication channels should be open so that customers can be kept informed.

Q15. SICAB would agree that this standard would support customers with suspected problems with their smart meters along with their IHD’s as this is not the case at the moment. More information needs to be available to customers on how to work the IHD, in particular, when topping up the smart meter PPM but the connectivity is not available for it to happen remotely.

Q16. Whilst SICAB agree that the best approach is to expand on the existing “faulty meter” and “faulty prepayment meter” standards, we are unsure if the energy suppliers would be able to meet the suggested requirements of completing an initial installation in that time period. Especially in remote and rural areas where travelling time and accommodation need to be taken into consideration. We are also unsure if the energy suppliers would be able to carry out the regulatory actions within the timescale.

Q17. SICAB feel that the energy suppliers would have the default position of saying that the issues with faulty meters and faulty PPM’s are beyond their control and not doing anything further for the customer.

Q18. SICAB know that consumers are saying “why do I have to get a smart meter fitted when we know that it is not going to work due to no connectivity in my area”. Where is the incentive for the consumer to engage with the entire process? Why can’t things stay the same? We agree that there should be compensation for a smart meter that does not operate in smart mode. However, the part about it being in within the supplier’s control to resolve, and has not been resolved, is again, letting the supplier lead the situation in saying it is not within their control to do so and not helping the customer any further. Energy Suppliers have to take responsibility for the connectivity issues that their customers are experiencing.

Q19. With regard to the outlines of “out of scope” and “in scope”, SICAB agree with the definitions as laid out.

Q20. SICAB agree with the initial views on what constitutes “a smart meter” and “not operating in smart mode” for the purposes of this proposal only.

Q21. SICAB do not feel that enough information has been included in the updated regulations as to what constitutes “another party” and the actions required of them to help ensure that any smart meter in customer’s homes are working correctly. Apportioning responsibility to a BroadBand provider, for example, to deal with connectivity issues means that there is the potential for energy supplier’s to state that they have done all they can for their customer and not do anything further for them. SICAB feel that there is too much scope here to cause confusion on who is responsible for what and for blame to be apportioned to other parties.

Q22. As we have already seen in rural and remote areas who do not have Broad Band connectivity, many have been waiting years for this to be resolved for them, so it is unlikely that a 90 day period would be sufficient.

Q23. SICAB agree that consumers should receive compensation for both gas and electricity meters if applicable.

Q24. SICAB 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.

Q25. SICAB is wondering if any of these changes will force limited tariff choices on the consumer due to issues outlined?

Q26 – Q32. SICAB agree in principle to the proposals under consideration for non-domestic consumers but feel unable to comment further due to little experience in this sector.

**General Feedback**

While we welcome the proposal by Ofgem to update The Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015, SICAB cannot emphasis enough that the smart meter rollout in Shetland has been extremely problematic and is currently stagnating due to lack of available appointments for consumers to access a smart meter, not to mention the connectivity and metering issues which are impeding the installations.

It is looking more and more likely that energy suppliers will not be meeting the required targets of smart meter installations before the RTS switch off at the end of June. This has created an atmosphere of anxiety within consumers in our locality who are understandably worried about what is going to happen to their meters, heating systems and costs.

While SICAB think that the updated compensation figures look appealing, we know from experience that energy suppliers appear to be quite happy to continue to pay ongoing compensation costs to their customers without then taking any action to sort out the issue. It is not unusual to hear of customers getting multiple compensation payments for cancelled engineer appointments. This is one of the reasons that we do not think that the compensation figures are equable to the length of time customers have to endure estimated billing, lack of communication and waiting for technology to catch up.

SICAB feel that there are too many chances for energy suppliers to avoid responsibility for not being able to install a smart meter in a customer’s home and then decide that they do not want to be their supplier any more.