

28th April 2025

By email:

smartmetering@ofgem.gov.uk

Consultation on Smart Meter Guaranteed Standards of Performance

Alt HAN Co welcomes the opportunity to respond to the joint DESNZ/Ofgem consultation on Smart Meter Guaranteed Standards of Performance.

As the proposals affect energy suppliers, who will be best placed to respond, we have limited our responses to the questions which are directly or indirectly relevant to Alt HAN Co and Alt HAN services.

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

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

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?

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

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

AHC response: No comment on Q1-5.

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?

AHC response: Yes, we agree that an appointment should only be confirmed when the Supplier has an expectation that they can complete a smart installation. As well as known WAN availability we also note circumstances below which may warrant the need to defer an installation.

AHC undertakes a service (Crowded Meter Room service) on behalf of energy suppliers which is aimed at enabling the installation of smart metering and the Alt HAN solution where a spatial or other technical constraint would otherwise prevent an installation. It would therefore seem sensible that, where a customer with a meter in a room that has been reported and/or

confirmed as being subject to CMR investigation and CMR works, that the Supplier should be exempt from making an appointment which may otherwise lead to an aborted visit.

If Suppliers do not have the capability to defer an appointment when the meter is in a building subject to a CMR investigation the following risks arise:

- a) The Supplier may have to abort the installation and will have to await the resolution of the CMR anyway leading to an unsatisfactory customer experience and an abort cost;**
- b) The Supplier may be able to complete an install utilising what limited space is available but in doing so may exacerbate the spatial issues in the meter room and the meter may still need to be moved to resolve the room for all customers. This would lead to further disruption for the customer.**

Therefore, it would be in the best interests of the customer for Ofgem to consider that, where a meter is in a room subject to CMR investigation, that the 6 weeks appointment countdown starts at the point the Supplier is notified that the room is 'smart ready' following the completion of the CMR activity.

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

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?

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

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?

AHC response: No comment on Q7-10.

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

AHC response: The consultation notes the scenario that the Supplier does not have the 'correct meter/installation assets' as within the control of the Supplier. It is unclear whether this applies to installations that require Alt HAN to complete the installation, if so, this should be stated for avoidance of doubt.

We note from experience from Suppliers who are currently installing using Alt HAN that sometimes Alt HAN is needed where it was not originally expected to be required. The safest way to ensure an installation can always be completed would be to ensure engineers always carry Alt HAN stock alongside other spare stock to meet the various installation scenarios.

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

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

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

AHC response: No comment on Q12-14.

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

AHC response: We note that where a consumer has the Alt HAN solution and is experiencing loss of data to the IHD this may be due to the customer having removed or switched off the bridge plugged into the property which is conveying the signal to the IHD. This does not change the proposed obligation on the Supplier to investigate but should form part of any initial engagement with the customer. In the event of customer churn/change of tenancy a Supplier should check if Alt HAN devices were installed during the original installation.

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

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

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?

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

AHC response: No comment on Q16-19.

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?

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

AHC response: We note that SMETS equipment is in scope but the IHD is not. There is a scenario where the ESME is operating but the GSME is not due to loss of HAN signal due to customer action.

The Alt HAN solution is used where the signal from the Communications Hub cannot reach the IHD or GSME. In this regard the Alt HAN solution can also be used to address ‘non-operating’ (or intermittent) GSME. However, the Alt HAN solution does require the customer to keep a device in the home plugged in and switched on. Loss of signal to the GSME would occur where the bridge is unplugged and/or switched off at the socket.

Caution should be used therefore when assessing any new obligation on a Supplier to resolve ‘non-operating’ GSME which relies on customer action (or inaction) due to the use of the Alt HAN solution.

In the event of customer churn/change of tenancy a Supplier should check if Alt HAN devices were installed during the original installation.

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

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

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?

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

AHC response: No comment on Q22-25 or the subsequent questions relating to non-domestic.

If you would like to discuss any of our response I would be grateful if you could liaise with my colleague David.jones@althanco.com in the first instance.

Yours sincerely

A handwritten signature in blue ink that reads "Paul Cooper". The signature is stylized with a large 'P' and a cursive 'C'.

Paul Cooper
Managing Director
AltHAN Co