

Consultation Response: Smart Meter Communication Licence

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Consultation: Draft Smart Meter Communication Licence (Published 18 September 2025)

Background and Industry Experience

Aston & Co UK Ltd has extensive experience in renewable energy systems, energy data logging, and billing infrastructure. Our work includes:

- Solar PV and GSHP installations
- [Persnore Hydro](#) scheme (energy generation and billing)
- Design and deployment of 11kV/415V private substation and private grid connected network
- Smart meter data logging and invoicing via licensed meter operators and data aggregators (originally UPL, later SMS)

The systems we helped design functioned reliably until the licensed MOP was acquired and a generic web dashboard was imposed. This led to serious billing errors — including invoices approaching £100,000 due to harmonic spike misinterpretation and code faults. We hold documentary evidence of this from August 2020, involving a net-exporting private generator, Npower and the former Western Power Distribution (DNO).

Recent Domestic Concerns

In the past 12 months, we raised concerns with Scottish Power regarding meter accuracy, data aggregation, and billing. Despite stable load patterns in 2023 and 2024, our 2025 bills nearly doubled. Scottish Power's own app graphically highlights the discrepancy.

Yet:

- We were denied access to half-hourly (HH) data
- The issue remains unresolved more than 8 weeks after escalation
- Our original HH data request (March 2024) was also denied

This matter has now been escalated to the energy regulator.

Monopoly Oversight and Transparency Failures

We reviewed Ofgem's concerns about the smart meter incumbent's monopoly position. Upon visiting the incumbent's website, we found key consultancy documents heavily redacted — and tonight, several weblinks failed entirely.

This raises serious concerns about:

- Quality assurance in the smart meter rollout
- Consumer vulnerability due to lack of transparency
- Inaccessibility of HH data for MPAN holders
- Errors in metering, aggregation, and invoicing that cannot be independently verified — even by technically literate users, let alone vulnerable consumers

This must be addressed in the new licensing regime. The current system is open to abuse by both the monopoly operator and suppliers relying on flawed rollout infrastructure

Case Summary

1. Consumer Access to Billing Data

Domestic Example: Scottish Power

Key issues:

- **Inconsistent visibility:** Some billing periods show 2–3 months of data, others only one
- **Insufficient bill detail:** PDF bills lack clear, plain-English breakdowns. To enable reconciliation, all bills should:
 - Be issued monthly
 - State total energy used (kWh)
 - Show tariff applied (p/kWh)
 - Specify number of days covered and any standing charge
 - Present a clear, itemised calculation of total cost
- **Inaccessible archives:** Links to older PDF bills (beyond 2–3 months) often fail

This undermines consumer auditability and violates expectations of data retention. The Communication Licence must enforce:

- Minimum standards for data visibility (e.g. 18-month rolling access)
- Mandatory inclusion of timestamped usage breakdowns
- Supplier accountability for broken links and inaccessible archives

2. Transparency Failures in Smart Meter Governance

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We reviewed Smart DCC's published consultations and tender documents. One key example is the dashboard-related consultancy tender under the External Contract Gain Share (ECGS) mechanism. The document includes proposals for dashboard development and data visualisation — yet over 90% of the content is redacted, including:

- Cost breakdowns
- Service provider terms
- Strategic risks and delivery assumptions

This level of opacity is unacceptable in a regulated monopoly. It prevents consumers, analysts, and suppliers from understanding how smart meter infrastructure is governed and funded.

We urge Ofgem to:

- Require transparent publication of consultancy findings
- Justify redactions under public interest tests
- Commission an independent review of smart meter rollout efficacy — especially regarding consumer-facing tools like dashboards

3. Technical Evidence from Independent Monitoring

We have deployed a forensic-grade energy logger that captures 1s, 10s, and 1m granular data. In checks against a domestic Elster SMETS2 meter, this revealed:

- Discrepancies between SMETS2 dashboard readings and actual appliance usage
- Apparent overbilling exceeding £1,200 in 2025
- Supplier refusal to provide half-hourly data despite multiple requests

This highlights the need for:

- Mandatory consumer access to raw HH data

- Supplier obligation to reconcile billing with technical evidence
- Support for independent validation tools to protect consumers

Submitted by:

Aston & Co UK Ltd

