

Low Carbon Technology Information - Proposed changes to the Electricity and Gas Supply Standard Licence Conditions

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Contact:	Scott McPhillimy
Team:	Retail Market Operations
Email:	smartmetering@ofgem.gov.uk

We are consulting on proposed modifications to the Gas and Electricity Supply Licence Standard Licence Conditions. These proposed changes would enable suppliers, and their smart meter installers, to provide consumers with factual and non-promotional information on low carbon technologies (LCTs) during a smart meter installation visit. This could include information on their availability, energy efficiency, and potential costs and benefits.

The intent of this proposal is to remove unnecessary regulatory uncertainty that may prevent consumers from receiving factual and non-promotional information about LCTs during a smart meter installation visit, while maintaining protections against unsolicited marketing or sales activity in the home.

We welcome views from energy suppliers, organisations representing consumers or industry participants, and any individuals or organisations with an interest in LCTs or smart meter installation visits.

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Consultation Low Carbon Technology Information - Proposed changes to the
Electricity and Gas Supply Standard Licence Conditions

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1.Introduction

This section outlines the purpose of the consultation, related documents and an overview of consultation process.

Context

- 1.1 We are consulting on proposed modifications to Electricity Supply Licence Standard Condition 41 and Gas Supply Licence Standard Condition 35. The proposed changes would clarify when energy suppliers and their smart meter installers may provide domestic consumers with factual and non-promotional information about LCTs during a smart meter installation visit, without this being treated as marketing activity.
- 1.2 The intent of this proposal is to remove unnecessary regulatory uncertainty that may prevent consumers from receiving factual and non-promotional information about LCTs during a smart meter installation visit, while maintaining existing protections against unsolicited marketing or sales activity in the home.
- 1.3 We want consumers to have access to clear, balanced and objective information that helps them make informed choices about their energy use, costs and carbon emissions. Smart meter installation visits may provide an opportunity for consumers to receive general information about LCTs, such as heat pumps, solar panels, battery storage and electric vehicle charge points, where that information is relevant and helpful. Suppliers are already able to provide under their Standard Licence Conditions (SLC).¹
- 1.4 This proposal is targeted. It is not intended to permit sales activity, product promotion, lead generation, supplier-specific recommendations or pressure selling during a smart meter installation visit without the consumer's prior consent.
- 1.5 We welcome views from energy suppliers, organisations representing consumers or industry participants, and any individuals or organisations with an interest in low carbon technologies or smart meter installation visits.

Purpose of this consultation

- 1.6 This consultation sets out our proposed changes to Electricity SLC 41 and Gas Supply Licence SLC 35. The proposed changes would insert a new paragraph

¹ [Standard Licence Condition 35 of the Electricity and 41 of the Gas Supply Licences](#)

41.10A into Electricity Supply Licence Standard Condition 41, and a new paragraph 35.10A into Gas Supply Licence Standard Condition 35.

- 1.7 The consumer outcomes we are seeking are that domestic consumers can access factual and non-promotional information about LCTs; understand that they are under no obligation to engage with this information; and remain protected from unsolicited marketing, pressure selling or inappropriate commercial influence during a smart meter installation visit.
- 1.8 The proposed changes would allow suppliers and their smart meter installers to provide consumers with general information about LCTs, including their availability, energy efficiency, and potential costs and benefits. Any information provided should be factual, appropriately caveated, and must not specify, promote or recommend a particular brand, supplier, provider or product.
- 1.9 We propose to amend the licence conditions to:
 - Allow energy suppliers and their smart meter installers operatives to provide domestic consumers with objective information about LCTs including their availability, energy efficiency, and costs and benefits, during a smart meter installation visit, without having to obtain prior consent from the Domestic Customer.
 - Make clear that any discussion about LCTs must be secondary to the purpose of the smart meter installation visit and provided in a non-promotional manner.
 - Require that, where a domestic consumer or a member of their household indicates that they do not wish to discuss LCTs, the discussion must cease immediately
 - maintain the existing prohibition on marketing activity during smart meter installation visits unless the consumer has provided prior consent.
- 1.10 For the avoidance of doubt, the proposed changes would not permit suppliers or installers to market their own products or services, generate sales leads, arrange follow-up sales appointments, make supplier-specific recommendations, or present personalised financial or suitability assessments during the installation visit unless this is permitted under the existing rules and the consumer has given the necessary consent.
- 1.11 This consultation follows feedback received through the government's Call for Evidence, "Enhancing the smart meter installation journey towards Clean Power

2030”, published in August 2025.² The Call for Evidence sought views on opportunities to drive efficiencies and improve the consumer experience through closer alignment between smart meters and LCTs. We have closely engaged with colleagues from the Department of Energy Security and Net Zero about the responses they received to their CfE.

1.12 This consultation seeks stakeholders’ views on these proposed changes. We welcome all feedback on our proposals. This document outlines the scope and purpose of our proposed changes to the licence, and how you can get involved.

1.13 Subject to the outcome of this consultation, should we decide to proceed with the proposals, consequential code modifications would be required within the Retail Energy Code.

Related publications

The Electricity Supply Licence Standard Conditions can be found here:

<https://epr.ofgem.gov.uk/c/9wgWVKeHRymQ3pBbiptyqA/p/0196c209-4e4c-4e2b-92ae-525b634f2f51/wvp/9072336a-de0b-453a-8cef-5128fdfa1224>

The Gas Supply Licence Standard Conditions can be found here:

<https://epr.ofgem.gov.uk/c/xy42ijGNQHGZlwVFYcixCw/p/b30b97ae-de90-43e3-9526-3833c110b0fe/wvp/5cfcbdba-09b0-4d40-90e6-e9eb95eb1e3d>

Consultation stages

Stage 1 Consultation open: 24 September 2026

Stage 2 Consultation closes (awaiting decision). Deadline for responses: 22nd October 2026

Stage 3 Consultation decision November/December 2026

How to respond

We want to hear from gas and electricity licence holders, and anyone interested in this consultation. Please send your response to the person or team named on the front page of this document.

We have asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

² [Enhancing the smart meter installation journey towards Clean Power 2030 - GOV.UK](#)

We will publish non-confidential responses on our website at www.ofgem.gov.uk/consultations.

Your response, data, and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information. For example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations, or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those that you do not wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we will contact you to discuss which parts of the information in your response should be kept confidential and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the United Kingdom's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

If you wish to respond confidentially, we will keep your response confidential, but we will publish the number, but not the names, of confidential responses we receive. We will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

How to track the progress of a consultation

1. Find the web page for the call for input you would like to receive updates on.
2. Click 'Get emails about this page', enter your email address and click 'Submit'.
3. You will receive an email to notify you when it has changed status.

A consultation has three stages: 'Open', 'Closed (awaiting decision)', and 'Closed (with decision)'.

2. Background

This section explains the existing requirements on energy suppliers during smart meter installation visits, the issue raised through the Government’s Call for Evidence, our engagement with government on those responses and why we are consulting on a targeted licence change to clarify the boundary between factual information and marketing activity.

- 2.1 When smart meters are being installed in domestic consumers’ homes, energy suppliers must comply with the Consolidated Code of Practice (CoMCoP) and the relevant Supply Licence Conditions. CoMCoP Section 8.10 requires suppliers to provide free energy efficiency advice during the smart meter installation visit. This advice typically covers practical measures that can help consumers reduce their energy consumption and bills, such as installing insulation, using heating controls effectively or switching to LED lighting.
- 2.2 CoMCoP Section 18.12, together with Electricity Supply Licence Standard Condition 41 and Gas Supply Licence Standard Condition 35, also protects consumers from unsolicited marketing during smart meter installation visits. These provisions prohibit marketing activity during installation appointments unless the consumer has provided prior consent. This protection is important because installation visits take place in consumers’ homes, where consumers may feel less able to disengage from unwanted discussions, and where some consumers may be in vulnerable circumstances.
- 2.3 Since these requirements were introduced, LCTs have become more central to the transition to a lower-carbon energy system. Technologies such as heat pumps, solar panels, battery storage and electric vehicle chargepoints may, where suitable for the consumer and property, help consumers manage their energy use, reduce carbon emissions and potentially lower energy costs over time. Consumers may therefore benefit from clear, balanced and factual information about these technologies, including how they relate to smart meters and future energy use.
- 2.4 In August 2025, the government published a Call for Evidence (CfE), “Enhancing the smart meter installation journey towards Clean Power 2030”.³ This CfE sought

³ [Enhancing the smart meter installation journey towards Clean Power 2030 - GOV.UK](#)

views on opportunities to drive efficiencies and enhance the consumer experience through closer alignment between smart meters and LCTs.

- 2.5 We have engaged with colleagues in the Department for Energy Security and Net Zero on the responses received to the CfE, including the issues raised about the interaction between the current marketing restrictions and the provision of information about LCTs during smart meter installation visits.
- 2.6 Several respondents to the governments' CfE noted that CoMCoP Section 18.12 on marketing, together with the Electricity Supply Licence Standard Condition 41 and Gas Supply Licence Standard Condition 35, may create uncertainty about whether suppliers and installers can discuss relevant LCTs with consumers during smart meter installation appointments without this being treated as marketing activity. In particular, respondents were concerned that even factual discussion of technologies such as heat pumps, solar panels, battery storage or electric vehicle chargepoints could be interpreted as marketing unless the consumer had provided prior consent.
- 2.7 Having considered the issues raised through the Call for Evidence, and following our engagement with government, we consider there is merit in consulting on a targeted change to the relevant Supply Licence Conditions. The issue is not whether suppliers should be able to market low carbon technology products or services during smart meter installation visits without prior consent. They should not. The issue is whether the current framework is sufficiently clear that suppliers and installers may provide factual and non-promotional information about low carbon technologies, where this is separate from marketing activity and does not involve promoting or recommending a particular supplier, provider, brand or product.
- 2.8 We consider there may be value in clarifying this boundary. Without greater clarity, consumers may miss opportunities to receive useful general information during a smart meter installation visit, even where that information could help them understand future energy choices and the potential role of LCTs in reducing energy use, costs and carbon emissions. However, any such clarification must preserve the existing protections in CoMCoP Section 18.12, Electricity Supply Licence Standard Condition 41 and Gas Supply Licence Standard Condition 35 that prevent smart meter installation appointments becoming sales opportunities.
- 2.9 Our proposal is therefore targeted. We are consulting on whether to amend Electricity Supply Licence Standard Condition 41, by inserting a new paragraph 41.10A, and Gas Supply Licence Standard Condition 35, by inserting a new paragraph 35.10A. These proposed amendments would clarify that suppliers and their smart meter installers may provide objective information about low carbon

technologies during a smart meter installation visit without this being treated as marketing activity, provided the information remains factual and non-promotional and does not specify, promote or recommend a particular brand, provider, supplier or product.

- 2.10 Any discussion of LCTs must remain secondary to the purpose of the smart meter installation visit. It should not involve sales activity, product promotion, personalised suitability assessments, lead generation, follow-up appointment booking or pressure selling unless this is permitted under the existing rules and the consumer has given the necessary consent. The discussion must also cease immediately if the consumer, or any member of their household, indicates that they do not wish it to continue.
- 2.11 We consider this approach is consistent with our statutory duties. It seeks to support better consumer outcomes by enabling consumers to receive helpful, general information about low carbon technologies, while maintaining important safeguards against unsolicited marketing or inappropriate commercial influence during installation visits.

3. Proposed amendments to the Electricity and Gas Supply Licence Standard Conditions

This section sets out our proposed amendments, including proposed legal wording, to the Electricity and Gas Supply Licence Standard Conditions (SLCs). The proposed amendments would clarify when energy suppliers and their smart meter installers may provide domestic consumers with factual and non-promotional information about low carbon technologies during a smart meter installation visit without this being treated as marketing activity. The proposed amendments are intended to support informed consumer choices while maintaining existing protections against unsolicited marketing or sales activity in the home.

Summary of proposed amendments

- 3.1 Under the current regulation, energy suppliers are required to obtain prior consent from domestic consumers before carrying out marketing activity during a smart meter installation.
- 3.2 We are proposing to amend Electricity Supply Licence Standard Condition 41, by inserting a new paragraph, Condition 41.10A, with equivalent changes to Gas Supply Licence Standard Condition 35, with a new paragraph, 35.10A. These proposed amendments would clarify that suppliers and their Representatives may provide domestic consumers, or any member of their household, with factual and non-promotional information about LCTs during a smart meter installation visit without this being treated as marketing activity.
- 3.3 The proposed amendments would apply only where the information is limited to objective information about LCTs, including their availability, energy efficiency, and costs and benefits. Any information provided must not specify, promote or recommend a particular brand, provider, supplier or product. The proposed amendments would not permit energy suppliers to market their own products and services. Where suppliers collect personal data or seek consent for follow-up contact, they must continue to comply with applicable data protection and direct marketing requirements.
- 3.4 Energy suppliers will remain prohibited from carrying out marketing activity during the smart meter installation visit unless the Domestic Consumer has provided prior consent. The proposed amendments do not alter that underlying protection. Any discussion of low carbon technologies must remain secondary to the purpose of the smart meter installation visit.

The proposed amendments would also require any discussion of low carbon technologies to stop immediately if the domestic consumer, or any member of their

household, indicates that they do not wish the discussion to continue. This safeguard is intended to ensure consumers remain in control of the interaction, particularly where the discussion takes place in the consumer's home or involves consumers in vulnerable circumstances.

Proposed Standard Licence Condition amendments

- 3.5 To reflect the above within the Electricity Supply Licence Standard Conditions we are proposing to add a new paragraph, 41.10A, to Condition 41: Smart Metering Installation and Installation Code of Practice – Domestic Customers to include:

41.10A Without prejudice to the requirements of paragraph 41.10, the Domestic Installation Code:

(a) shall provide that the licensee and its Representatives may, during a visit to install a Smart Metering System and without the Domestic Customer having given explicit consent in advance of the installation visit, provide verbal advice and information to the Domestic Customer (or any member of their household) on the availability, energy efficiency, and costs and benefits, of low carbon technologies so long as any such information and advice does not involve specifying or recommending any brand or provider of low carbon technologies;

(b) shall provide that, for the purposes of paragraph 41.10, the provision of advice and information in reliance of sub-paragraph (a) does not constitute Marketing;

(c) shall, where it provides for the matters set out in sub-paragraph (a), provide that the provision of advice and information being given in compliance with sub-paragraph (a) cease immediately upon a request to do so by the Domestic Customer (or any member of their household).

- 3.6 To reflect the above within the Gas Supply Licence Standard Conditions we are proposing to add a new paragraph, 35.10A, to Condition 35: Smart Metering Installation and Installation Code of Practice – Domestic Customers, to include:

35.10A Without prejudice to the requirements of paragraph 35.10, the Domestic Installation Code:

(a) shall provide that the licensee and its Representatives may, during a visit to install a Smart Metering System and without the Domestic Customer having given explicit consent in advance of the installation visit, provide verbal advice and information to the Domestic Customer (or any member of their household) on the availability, energy efficiency, and costs and benefits, of low carbon technologies so long as any such information and advice does not involve specifying or recommending any brand or provider of low carbon technologies;

(b) shall provide that, for the purposes of paragraph 35.10, the provision of advice and information in reliance of sub-paragraph (a) does not constitute Marketing;

(c) shall, where it provides for the matters set out in sub-paragraph (a), provide that the provision of advice and information being given in compliance with sub-paragraph (a) shall cease immediately upon a request to do so by the Domestic Customer (or any member of their household).

Questions

- Q1. Do you agree with the proposed amendments to the Supply Licence Standard Conditions to clarify that suppliers and their Representatives may provide factual and non-promotional information about low carbon technologies during a smart meter installation visit without this being treated as marketing activity?
- Q2. Do you agree with the proposed amendments to the Supply Licence Standard Conditions to ensure that consumers can immediately end the discussion regarding low carbon technologies upon request?
- Q3. Do you agree with the proposed wording set out in paragraphs 3.1 and 3.2 relating to:
- A new paragraph, 41.10A of Electricity Supply Licence Standard Condition 41;
and
- A new paragraph, 35.10A(a) and 35.10A(b) of Gas Supply Licence Standard Condition 35?
- Q4. Do you have any additional comments that are relevant to this consultation?

Send us your feedback

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this consultation. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this document?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Are its conclusions balanced?
- Did it make reasoned recommendations?
- Do you have any further comments?

Please send your feedback to stakeholders@ofgem.gov.uk.

Appendix 1. Privacy policy

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, “Ofgem”). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

Department for Energy Security and Net Zero.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for 12 months after the consultation has ended.

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services

- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you

1. to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/> or telephone 0303 123 1113.

7. Your personal data will not be sent overseas.

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system.

10. More information For more information on how Ofgem processes your data, view our [Ofgem privacy policy](#).