

Guidance

Preparation and Submission of revised Smart Metering Deployment Plans for Relevant Period 2 onwards

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This document is for energy suppliers who supply more than 20,000 domestic meter points. It provides guidance on the expectations and requirements for the preparation and submission of the **revised Deployment Plan for Relevant Period 2 onwards**, as required under standard licence condition (SLC) 38 of the gas supply licence and SLC 44 of the electricity supply licence. It also provides guidance on the submission process and timeline, and outlines the assessment criteria that the Authority will have regard to when considering whether to accept or reject a Deployment Plan.

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1. Introduction

Scope and purpose

- 1.1 In May 2026, the new [Post 2025 Smart Metering Policy Framework](#) came into force. It requires energy suppliers to take all reasonable steps to:
- complete the smart meter rollout by installing smart meters in all remaining domestic premises by the end of 2030,
 - pre-emptively replace all legacy Communications Hubs (Comms Hub) and SMETS1 smart metering assets by 2033, which would otherwise cease to function as a result of Wide Area Network (WAN) services ending, and
 - ensure smart meters in traditional mode are back working in smart mode for consumers as soon as possible and no later than 90 days from the date energy suppliers are first aware.
- 1.2 The new Post-2025 Framework also requires energy suppliers to submit annual Deployment Plans to Ofgem, in which they must provide detail of the Annual Milestones they have set for each of the above obligations and outline the activities they will undertake to meet these milestones. These requirements are set out in detail in [standard licence condition \(SLC\) 38 of the gas supply licence](#) and [SLC 44 of the electricity supply licence](#) (the Relevant Licence Conditions).
- 1.3 Suppliers submitted an initial non-binding Deployment Plan in July 2026 for Relevant Period 1 (1st July – 31st December) onwards. Ofgem has assessed all submissions and outcomes have now been communicated to suppliers.
- 1.4 **This guidance is intended to support energy suppliers in preparing and submitting the revised Deployment Plan for Relevant Period 2 (2027) onwards.** Suppliers must have regard to this guidance when preparing and submitting their Deployment Plans as set out in paragraphs 15 of the Relevant Licence Conditions.
- 1.5 This Guidance is relevant to all gas or electricity supply licence holders authorised to supply domestic premises, where the Relevant Licence Conditions apply to the Licensee (in that the licensee, together with its Affiliates, supplies gas or electricity to Customers at Domestic Energy Premises via, in each case, more than 20,000 Energy Meter Points).
- 1.6 Suppliers should note that they are required to achieve the Relevant Period 1 Annual Roll-out Milestone, the Annual SMETS1 Milestone, and the Annual CH Milestone set out in their Deployment Plan (i.e. these Milestones will be binding), as set out in paragraphs 16 of the relevant licence conditions.

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- 1.7 Suppliers should also note that they will be required to publish the Annual Milestones set in their revised Deployment Plans for Relevant Period 2 onwards prominently on their website no later than two working days after 1 January 2027. If a Deployment Plan is rejected and a revised plan is requested, suppliers will be required to publish their Annual Milestones on their website two weeks after Ofgem communicates that the revised plan has not been rejected. Further information on publication requirements will be communicated to suppliers separately in due course.

Related publications

- 1.8 Suppliers should read this guidance in conjunction with any directions issued by the Authority relating to the submission of the Deployment Plans.
- 1.9 **Pursuant to the Relevant Licence Conditions¹, the Authority issues, alongside this Guidance, a direction which takes effect on the 21 September 2026 - “Direction to Submit Revised Smart Metering Deployment Plans”.** This direction replaces and revokes the previous ‘Direction to Submit Smart Metering Deployment Plans’ made on 2 June 2026.
- 1.10 The direction issued directs:
- Additional data requirements for the Deployment Plan,
 - The format required for the submission of the Deployment Plan, including the two templates (further guidance on the templates is contained in Chapter 2),
 - The submission of the Deployment Plan templates via the secure workspace,
 - The submission date for the revised Deployment of 30 October 2026, and
 - The dates by which, for an accepted Deployment Plan, the Annual Milestones must be published prominently on the supplier’s website.

Future requirements

- 1.11 We intend to issue a further direction in late 2026 which will set out the requirements for energy suppliers to prepare and submit to the Authority in early 2027 a Progress Report, to set out their performance and progress against the Annual Milestones for Relevant Period 1 (31st July – 31st December 2026) established in the previous non-binding Deployment Plan (as outlined in

¹ Including paragraphs 5, 8(e) and 19(f) of the Relevant Licence Conditions.

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paragraphs 17 of the Relevant Licence Conditions). Suppliers will have to publish this Progress Report prominently on their own website alongside the publication of their Annual Milestones.

- 1.12 Suppliers should note that they will be required to submit an annual revised Deployment Plan for every calendar year proceeding the next Relevant Period, with a submission required in advance of the start of the next Relevant Period, i.e. submission of a revised Deployment Plan for Relevant Period 3 onwards will be required in Q4 2027. Ofgem will issue updated guidance and templates for each annual submission.

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2. Completing the Deployment Plan templates

This section provides advice for suppliers to follow when completing both revised Deployment Plan Templates. **Suppliers should note that failure to follow the below requirements may result in rejection of the Deployment Plan and a requirement for re-submission.**

General guidance

2.1 There are two templates which must be completed and both must be submitted:

- **Template A - Post 2025 DP_Excel Template_Relevant Period_2** - an Excel workbook, which provides space for suppliers to provide quantitative data in relation to each question.
- **Template B – Post 2025_DP_Word Template_Relevant Period_2** - a Word document which requires suppliers to provide a supporting narrative and justification for the Annual Milestones they have set, and an explanation of how they intend to achieve the Milestones.

Template A is the definitive source of all numerical information. Template B should explain the rationale for those numbers and should not reproduce numerical tables unless specifically requested.

2.2 The Deployment Plan must be approved by the licensee's board of directors, and **both templates must be signed by a director of the licensee**, in accordance with paragraph 5 of the Relevant Licence Conditions.

2.3 **Suppliers should provide information once and cross-reference it where it supports more than one response.** Cross-references may be made to either another answer in Template B; the relevant worksheet, question, table or cell in Template A; or an item in the Evidence Index. A cross-reference should identify the precise location and briefly explain its relevance to the question. Ofgem does not expect duplicate narrative where a clear cross-reference has been provided.

2.4 Suppliers should also note the following general guidance:

- Suppliers should answer all questions. If a question is not relevant, please write 'Not Applicable' and provide a brief explanation as to why.
- Suppliers should keep responses concise, focused on material information and avoid generic statements. Word limits are maximums, not targets.

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- The Deployment Plans should include data, information and/or explanations related to domestic customers only.
- All Relevant Periods within this Deployment Plan run from 1 January – 31 December, with the second Relevant Period running 1 January – 31 December 2027.
- **The baseline data date for this Deployment Plan is 30 September 2026.**

Overarching Requirements

- 2.5 Suppliers are required to demonstrate within their Deployment Plans that they are meeting their obligations for the Smart Meter Roll out, Installation and Maintenance, and Operational Requirements, in that **they are taking All Reasonable Steps to achieve the outcomes set out in the Relevant Licence Conditions.**
- 2.6 **The Roll-out (Installation), Comms Hub replacement and SMETS1 replacement Milestones which suppliers set in their in revised Deployment Plan submissions from 2027 onwards are binding,** in that for each period commencing on or after 1 January 2027, the supplier must achieve the Annual Milestones set out in their Deployment Plans, per paragraph 16 of the Relevant Licence Conditions.
- 2.7 **Deployment Plans must include detailed, evidenced plans for the next Relevant Period and longer-term forecasts covering all future Relevant Periods.** These longer-term forecasts should be indicative and based on reasonable assumptions which must be clearly articulated and evidenced in Template B. Suppliers must clearly explain the inputs, rationale, constraints and limitations of their longer-term forecasts, ensuring they support delivery of the relevant obligations without introducing unnecessary risk. Ofgem appreciates that there is a degree of uncertainty within these forecasts and that they may evolve as evidence, policy detail and delivery experience develop. As such, we would expect suppliers to continuously review their Deployment Plan to ensure that the forecasts provided remain relevant throughout each Relevant Period. Suppliers may wish to refer to the Data Communications Company's Communication Services Availability Statement when completing their long-term forecasts.
- 2.8 **Suppliers should only provide information related to their actual operating model.** Ofgem does not expect suppliers to construct artificially fixed milestone-specific resource allocations, productivity measures or governance arrangements solely for the Deployment Plans where these are not used operationally. Where,

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for example, resources are shared or dynamically allocated, suppliers should provide the operational information which explains how overall capacity and competing priorities are managed, and how double counting is prevented. Suppliers should provide sufficient detail for Ofgem to understand whether shared or dynamically allocated capacity can credibly support the forecast Annual Milestones, and that the forecast activity is deliverable.

2.9 Deployment Plans are intended to be ‘living documents’ that suppliers revise and resubmit each year. Each iteration of the revised Deployment Plan should reflect material changes to evolving forecast Annual Milestones and delivery activity as evidence, assumptions and delivery experience develops. Ofgem does not expect suppliers to undertake a complete re-write of the plan each year.

2.10 The revised Deployment Plan for Relevant Period 2 onwards should build on the previously submitted initial non-binding Deployment Plan:

- Suppliers should review and update the forecast Annual Milestones to reflect changes in customer churn, delivery experience, and underlying assumptions, to ensure that projections remain accurate and fit for purpose.
- Suppliers should consider relevant feedback provided by Ofgem and learning from delivery, and responses should show how the supplier’s delivery approach, evidence and assumptions have developed.
- **Where a supplier has received a ‘Conditional Acceptance’ of their initial non-binding Smart Metering Deployment Plan, the supplier should substantially and significantly address the issues identified within the Conditional Acceptance letter.** This will form part of Ofgem's assessment criteria for the revised Deployment Plan, as set out in further detail below.

What has changed within the Templates for this submission?

2.11 Ofgem has revised both Templates for the revised Deployment Plan submission for Relevant Period 2 onwards, following a review of the submissions received for the initial non-binding Deployment Plans and feedback from suppliers and industry stakeholders. We have considered all stakeholder feedback in detail and the revisions to the Templates are intended to focus responses, address identified gaps and respond to and mitigate concerns.

2.12 The new Templates:

- Move away from a broad narrative design **to follow a more structured approach with clearer, targeted questions.** This is to provide greater clarity

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to suppliers with regards to the expectations of the information required and ensure greater consistency across supplier responses.

- **Reduce duplication of the narrative** by:
 - Removing the individual Milestone and gas and electricity splits within questions;
 - Focusing questions on ‘whole-plan’ delivery, assumptions, dependencies and risks, with a requirement for suppliers to only provide information in ‘Milestone-specific’ sections which creates or demonstrates an additional or different effect or impact for that Milestone.
 - Specifically enabling and encouraging cross-referencing throughout the Template to enable suppliers to submit more concise responses, ultimately reducing the volume of information required, and thus the regulatory burden.
- Place a stronger focus on the requirement for suppliers to **demonstrate that they are taking All Reasonable Steps to fulfil each obligation**, as required within the relevant licence conditions;
- Place a stronger focus on the requirement for forecasts, assumptions, dependencies, risks, justification and delivery approaches, etc. to be **quantified and evidenced where reasonably possible, through the inclusion of a supporting evidence index and a requirement for suppliers to upload evidence files to Huddle alongside their completed Templates**. This is to ensure that Ofgem can fully assess whether supplier submissions are credible, realistic and deliverable, as set out in the assessment criteria;
- Include additional questions to address gaps identified in the initial non-binding Deployment Plans, including:
 - A summary of the overall delivery position and the delivery transition from RP1 to RP2;
 - Discussion of the material changes made since the submission of the previous plan;
 - An explanation of learning from previous delivery;
 - A summary of the All Reasonable Steps taken by the supplier to achieve the obligations set out in the relevant licence conditions;
 - Detail of the suppliers’ governance, assurance and escalation processes;
 - A focus on the whole-plan delivery model, sequence and challenges;

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- Further detail on engineering capacity, resource allocation and deliverable capacity within a suppliers' actual operating model;
- Detail of material whole-plan assumptions, cross-cutting dependencies, and whole-plan risks and mitigations;
- An explanation for forecast residual Traditional meter population, including monitoring, opportunities for reduction and corrective action;
- Comparisons with previously reported Annual Rollout Milestones and progress monitoring for Relevant Period 1 activity.

Guidance for Template A - the Excel workbook

2.13 Completion requirements - suppliers must ensure that:

- All cells highlighted in white are completed in full.
- The guidance provided within each tab and for each question is followed.
- Data is submitted in the required format and structure, without amendment to formulas or template design.
- Validation checks are satisfied, including that the 'checksum' field does not display any errors.
- The data provided is consistent with the information submitted in Template B.

2.14 Data quality and integrity – suppliers must ensure that all data submitted is:

- Accurate and complete, with no missing or inconsistent fields.
- Internally consistent, including alignment between portfolio data and Annual Milestones.
- Based on robust and up-to-date evidence, reflecting the latest available data at the baseline date.
- Free from calculation and formatting errors.

2.15 Alignment with Annual Milestone – the data provided must support the Annual Milestones set out in the Deployment Plan:

- Portfolio data should provide a clear basis for the level and phasing of Annual Milestones.
- Milestones should be consistent with the size and composition of the supplier's portfolio.
- Any significant step changes or non-linear trajectories must be supported by corresponding data inputs or assumptions.

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2.16 Use of assumptions - where data relies on assumptions (for example, customer churn or portfolio changes), suppliers should:

- Ensure assumptions are reasonable, evidence-based, and clearly defined.
- Apply assumptions consistently across the template.
- Ensure that assumptions are reflected in both the data in Template A and the supporting narrative in Template B.

2.17 Consistency with Template B - Information provided in Template A must be consistent with the narrative set out in Template B:

- Annual Milestones in the Excel template must match those described in the Word template.
- Key assumptions and drivers reflected in the data must be clearly explained in the narrative.
- Any adjustments or scenario-based changes must be consistently applied across both templates.

2.18 Common issues to avoid – suppliers should take particular care to avoid:

- Missing or incomplete required fields.
- Inconsistencies between different sections or tabs.
- Misalignment between Annual Milestones and underlying data.
- Errors in validation checks (including ‘checksum’ failures).
- Unexplained discrepancies between Template A and Template B.

Guidance for Template B – the Word document

2.19 Template B provides the narrative supporting the data submitted in **Template A**.

It is a critical component of the Deployment Plan and will be used by Ofgem to assess whether the plan is evidence-based, credible, and deliverable. Suppliers should use this template to clearly articulate how their delivery model supports achievement of their proposed Annual Milestones. Responses must go beyond high-level statements and provide clear, structured explanations that demonstrate how the Annual Milestones have been derived and how delivery will be achieved. Suppliers should explain not only what they forecast to deliver, but why the forecast is achievable, what could affect delivery, and what action they will take if delivery is not progressing as expected.

2.20 Completion requirements – Suppliers should ensure that:

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- All required sections are completed in full.
- The guidance provided within each section and for each question is followed.
- Responses are submitted in the required structure, without amendment to the template design.
- Responses must directly and fully address the question asked.
- The narrative must be clear, concise, and specific. Suppliers should avoid generic statements and take note of word limits.
- The information provided is consistent with the data submitted in Template A. Where a response relies on information in Template A, provide the exact worksheet, question, table or cell reference within your answer. Where a response relies on supporting evidence, provide the evidence reference recorded in Section 10 of Template B.

2.21 Consideration of relevant feedback and learning from delivery. Where this have resulted in a change to the forecasts, assumptions, evidence, risks, controls or delivery approach, suppliers should explain that change in the relevant section.

- Where a supplier has received a 'Conditional Acceptance' of their initial non-binding Smart Metering Deployment Plan, the supplier should demonstrate that they have substantially and significantly addressed the issues identified within the Conditional Acceptance letter.

2.22 Derivation and explanation of Annual Milestones - Suppliers must clearly set out Annual Milestones for each Relevant Period and explain where requested:

- How the Annual Milestones have been derived, including the methodology used.
- The key drivers underpinning the Annual Milestones (e.g. portfolio size, demand, operational capacity).
- What the supplier plans to deliver during Relevant Period 2 and how this delivery supports achievement of the relevant obligation by its deadline.
- The rationale for any phasing or prioritisation of delivery.
- Each response should make clear the link between the milestone forecast, portfolio data, the evidence used, the key assumptions, the associated risks or dependencies, and the corrective action that would be taken if delivery is not on track.
- Suppliers should ensure that they do not double count activities or resources. Where the same activity or resource supports more than one Annual

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Milestone, explain how it supports each milestone and how double counting has been prevented.

- Annual Milestones in the Template B must match those in the Template A.

2.23 Clear distinction between and explanation of facts, forecasts, assumptions, dependencies and risks. Suppliers must provide:

- Evidence supporting key assumptions (for example, customer demand, churn, or delivery capacity), a clear explanation of how assumptions have been derived and applied and justification for any assumptions that materially impact delivery.
- Evidence identifying key risks to delivery (for example, operational, resource, or system constraints), the potential impact of these risks on milestone delivery and the mitigations in place to manage these risks.
- Identification of any material data limitations and explain how this affects confidence in the plan. Where reasonably possible, the effect on delivery should be quantified, including the affected volume, timing and any remaining delivery gap.

2.24 Delivery strategy and sequencing – suppliers must describe:

- Their overall delivery approach across the relevant Obligations and Relevant Periods.
- How activities will be prioritised and sequenced over time.
- How delivery will address known challenges (e.g. non-operating meters, underserved groups).
- Responses should demonstrate that the proposed approach is practical, coordinated, and aligned with achieving consumer outcomes.
- Residual population sections should focus only on the population forecast to remain after planned delivery activity and the action that may be available to reduce that population.

2.25 Quality and clarity of responses – suppliers must ensure responses are:

- Evidence-based, not descriptive or aspirational. Ofgem will consider whether the evidence provided supports the specific forecast, assumption or delivery judgement being made. The existence of supporting evidence will not, by itself, demonstrate that a forecast is credible. Suppliers must explain the relevance of that evidence and how it supports the proposed Annual Milestones and delivery profile.
- Provide sufficient detail to allow Ofgem to understand and assess delivery plans.

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- Clearly explain how the narrative supports the milestones provided in Template A.

2.26 Consistency with Template A – suppliers must ensure that:

- Annual Milestones in the Word template must match those described in the Excel template.
- Key assumptions and drivers explained in the narrative must be reflected in the data.
- Any adjustments or scenario-based changes must be consistently applied across both templates.

2.27 Common issues to avoid – suppliers should take particular care to avoid:

- Missing or incomplete answers.
- Providing limited, unclear or unevidenced justification for Annual Milestones.
- Relying on unsupported assumptions or outdated evidence.
- Submitting narrative which does not match the data provided.
- Failing to explain step changes or non-linear delivery profiles.
- Omitting discussion of risks or delivery constraints.
- Providing generic responses that do not directly answer the question.
- Unexplained discrepancies between Template A and Template B.

Evidence Index requirements

2.28 Suppliers must provide supporting evidence where reasonably possible for all forecasts, assumptions, dependencies, risks, all reasonable step justification or delivery approach discussed within either Template, where this evidence materially supports the detail being provided. In each relevant response, suppliers should briefly explain what the evidence demonstrates and how it supports the point being made.

2.29 The volume and detail of evidence should be proportionate to the materiality of the matter it supports, and Ofgem does not expect a separate item of evidence or file for every statement. Significant forecast changes, material assumptions and major delivery dependencies are likely to require stronger evidence than limited operational matters. Suppliers should prioritise evidence according to the potential effect of the matter on milestone delivery and confidence in the plan.

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- 2.30 **Each item of evidence must be assigned a unique evidence reference number and recorded in the Evidence Index in Template B.** Each evidence reference number should identify one controlled evidence item. There may be scenarios where one file contains multiple distinct items of evidence, in which case the file will require separate evidence reference numbers for each item of evidence. Suppliers should provide the relevant page, section, tab or extract reference within the evidence index. Conversely, the same evidence item may support multiple responses. In this case, evidence should be indexed once and reused through cross-reference.
- 2.31 **Each evidence file must be uploaded once to the suppliers' designated Huddle workspace.** Evidence filenames should begin with the corresponding evidence reference number. Suppliers should not upload duplicate evidence files. Where the underlying evidence is held in a live system, dashboard or larger document, suppliers should provide a controlled extract or evidence summary containing the relevant information. The submitted item must be accessible to Ofgem and sufficient to identify and verify the evidence relied upon.
- 2.32 Further details of the supporting evidence requirements can be found within the Evidence Index in Section 10 of Template B.

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3. Assessment approach and criteria

This section sets out the delivery priorities that suppliers should consider in their revised Deployment Plans, the baseline requirements that all Deployment Plan submissions must meet and the substantive assessment criteria that the Authority will have regard to when considering whether to accept or reject a revised Deployment Plan. Suppliers should note that failure to consider the below assessment criteria may result in rejection of the Deployment Plan and a requirement for re-submission.

Delivery priorities for the Deployment Plans

- 3.1 The new smart metering framework places increased emphasis on smart meter operability and pre-emptive asset replacement, alongside completion of the roll out. Suppliers should therefore ensure their Deployment Plans clearly demonstrate a focus on delivering reliable, accessible and high-quality smart metering services to ensure positive consumer outcomes.
- 3.2 Taken together, we recognise that the three new obligations represent a higher level of activity than seen over the previous five years. The number of installations required to meet the Annual Rollout Milestone alone between 2026-2030 is broadly comparable to the volume of meters installed under the previous framework (2020-2025). We acknowledge the practical challenges associated with delivering these obligations concurrently and, given the scale of activity required, suppliers are encouraged to adopt a targeted and prioritised approach to delivery, focusing activity first on areas which will have the greatest impact for consumers.
- 3.3 Our regulatory experience, including recent compliance activity on the previous rollout framework, non-operating meters and the replacement of Radio Teleswitch (RTS) meters, demonstrates that clear prioritisation, supported by transparent expectations and active engagement, leads to improved delivery outcomes and better consumer experiences. Therefore, progressing all obligations at the same pace may not be appropriate where this would reduce overall effectiveness or consumer benefit.
- 3.4 Suppliers should therefore demonstrate in their Deployment Plans how they will prioritise delivery that will support the following outcomes:
 - **Improved performance and reduced performance variation across suppliers**, including demonstrable progress in addressing individual areas of

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historical underperformance, particularly where there has been previous regulatory feedback or compliance action;

- **Improved access to smart meters for those who want them**, with a focus on meeting unmet demand amongst consumer groups who have historically fallen behind, such as prepayment meter customers and geographical regions with low levels of smart coverage; and
- **Reliable and functioning smart meter services**, which is critical for enabling consumers to consistently receive the benefits of smart meter functionality and improve trust in the programme.

3.5 Suppliers should also demonstrate **how they have identified and applied relevant lessons learned from previous large-scale delivery programmes** (for example, the RTS replacement programme), including how these lessons have informed their prioritisation, sequencing, and approach to delivery.

3.6 Prioritising outcomes that aim to improve the quality and fairness of delivery is about sequencing, not reducing ambition. Suppliers must still meet all their obligations as set out in the licence conditions and, from 2027 onwards, achieve their Annual Milestones. However, by focusing on different priorities at different times, there is an opportunity to better align delivery with sustained consumer benefits and reduce the risk that structural constraints undermine performance.

Assessment criteria

3.7 The Authority will have regard to the below criteria when considering whether to accept or reject a Deployment Plan.

Baseline Requirements:

- 3.8 A Deployment Plan will be rejected automatically if it does not meet the following criteria:
- Both Templates A (Excel) and Template B (Word) must be submitted within the designated Huddle workspace and named in the required format.
 - Submissions must be fully accessible and capable of assessment without any technical issues (including file corruption or inaccessible formats).
 - Both Template A and Template B must be signed by a director of the licensee, in accordance with paragraphs 5 of the Relevant Licence Conditions.
 - All questions must be answered and there must be no change to the format, design or formulas within the templates.

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- The baseline data date for the 2026 Deployment Plans must be **30 September 2026**.
- For Template A, all data submitted must be complete, accurate, and in the required format with no inconsistencies. This includes passing all validation checks (including checksum checks).
- For Template B, all questions must be completed in full, with detailed, evidenced responses that directly address the questions asked.
- Both templates must be internally consistent - there must be clear alignment between the Annual Milestones and underlying portfolio data and the narrative provided in **Template B** must align fully with the data submitted in **Template A**.

Standards for an acceptable Deployment Plan:

- 3.9 Once the baseline requirements have been met, we will then make a substantive assessment on whether the Deployment Plan is acceptable. Ofgem will assess the quality, relevance and consistency of the information provided, rather than the volume of information or repeated narrative.
- 3.10 A credible and acceptable Deployment Plan will demonstrate that it is evidence-based, deliverable, and clearly focused on achieving positive consumer outcomes. Ofgem will consider whether the evidence provided supports the specific forecast, assumption or delivery judgement being made. **The existence of supporting evidence will not, by itself, demonstrate that a forecast is credible.** Suppliers must explain the relevance of that evidence and how it supports the proposed Annual Milestones and delivery profile.
- 3.11 We will consider whether a supplier has demonstrated that the Deployment Plan meets the following criteria:
- **Clear, rational, and ambitious evidence-based milestones** – sufficiently ambitious, realistic and achievable Annual Milestones which are supported by robust, up-to-date data and a transparent methodology. Suppliers must demonstrate that each forecast Annual Milestone represents the maximum level of delivery reasonably achievable through the All Reasonable Steps (ARS) available to them. The identification of a constraint, risk, dependency, historic delivery rate, existing business plan or current level of resource will not, by itself, justify a lower Annual Milestone. Suppliers must explain:
 - the effect of the matter on delivery;
 - the steps taken or planned to address it;

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- any further actions considered;
 - why those further actions will not be taken, where applicable; and
 - the corrective or additional action that would be taken if circumstances change or delivery is not progressing as expected.
- **Credible assumptions and realistic phasing/ delivery profiles -**
Assumptions are clearly defined, evidence-based, and applied consistently. Delivery profiles are realistic, with any step changes or non-linear trajectories clearly justified.
 - **A coherent and deliverable strategy -** The plan sets out a practical delivery approach, including how activities will be prioritised and sequenced across the relevant obligations. All forecast delivery is sufficiently resourced and takes into account operational constraints and interdependencies.
 - **Clear explanation of material differences in delivery approaches between cohorts -** The plan explains any material differences in the delivery approach between fuels, consumer groups, meter types or other relevant cohorts. It demonstrates a targeted approach to delivery, focusing effort on areas that will have the greatest impact on consumer outcomes as discussed in this guidance, including a focus on reducing variation in areas of historical underperformance.
 - **Clear identification of assumptions, dependencies and risks -** Key risks to delivery are identified and assessed, with proportionate and credible mitigation strategies, contingencies and pathways for corrective action in place.
 - **Learning from previous delivery experience -** The plan clearly demonstrates how lessons learned from previous large-scale delivery programmes (for example, the RTS replacement programme), compliance action, regulatory feedback and operational experience have been identified and applied. This should include how these lessons have informed the supplier's forecast Annual Milestones and delivery approach including sequencing, coordination, and risk management. Where a supplier has received a 'Conditional Acceptance' of their initial non-binding Smart Metering Deployment Plan, the plan substantially and significantly addresses the issues identified within the Conditional Acceptance letter.

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Acceptance, rejection and resubmission

- 3.12 Where we decide that the Deployment Plan has been approved, we will confirm this in writing.
- 3.13 Where we decide to reject a Deployment Plan, we will also confirm this in writing and will set out clear reasons for the rejection and highlight the areas that need improving. The supplier will be required to re-submit a further Deployment Plan by the date specified in the correspondence, at which point we will re-assess the re-submitted Deployment Plan.

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4. Submission process and timeline

This section outlines the details of the submission process and the timeline for the submission and assessment process.

Submission process

4.1 Before submission, suppliers:

- Should ensure the final versions of both Template A and Template B are complete, consistent and fully reconciled, with any differences clearly explained.
- Should confirm that the plan has been reviewed for internal consistency, including consistency between the whole-plan sections, milestone-specific sections, residual population forecasts and supporting evidence. Supporting evidence should be clearly referenced and any draft or estimated information identified.
- Must obtain board approval and the signature of a director as set out in the relevant licence conditions.

4.2 Ofgem established a dedicated Huddle workspace for each supplier during the Relevant Period 1 Deployment plan submission process. For Relevant Period 2, a dedicated folder will be created within each supplier's existing Huddle workspace. Supplier must use this folder to submit their Deployment plans and supporting evidence.

4.3 Suppliers must submit both **Template A (Excel)** and **Template B (Word)** using the prescribed file naming conventions set out below. These conventions are required to ensure consistency and facilitate efficient processing and assessment.

Template A (Excel):

YYYY.MM_Supplier name_DP Excel submission_Relevant period_n

Template B (Word):

YYYY.MM_Supplier name_DP Word submission_Relevant period_n

Where:

- "YYYY.MM" refers to the submission date (year and month)
- "Supplier name" is the full legal name or recognised trading name of the licensee

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- “Relevant period_n” refers to the Relevant Period number (e.g. “2” for the second Relevant Period)

For example, for the second Relevant Period (this submission), a supplier named “XXX” should submit files named:

2026.10_XXX_DP Excel submission_Relevant period_2

2026.10_XXX_DP Word submission_Relevant period_2

4.4 Suppliers are responsible for ensuring that:

- Both templates are uploaded in the correct format and to the correct location
- File names follow the required naming conventions exactly
- Submissions are complete and submitted by the specified deadline
- Uploaded evidence filenames match the evidence references recorded in the evidence index in Template B.

4.5 Failure to follow the above requirements will result in an automatic rejection of the Deployment Plan and the supplier will be required to re-submit.

Timeline

Date	Action	Notes
21 September 2026	Ofgem publishes the direction and guidance and issues Deployment Plan templates to suppliers	
30 October 2026	Supplier submission deadline	As set in the Direction issued alongside this Guidance, pursuant to the relevant licence conditions.
27 November 2026	Latest date by which Ofgem will communicate to a supplier if their Deployment Plan has been rejected, and a revised Deployment Plan is required.	Ofgem has 28 days from the submission date to determine whether to reject the Deployment Plan and require a revised plan. Where revisions are required, we will write to

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		supplies and advise when they need to re-submit by, and Ofgem will have a further 28 days to re-assess.
5 January 2027	If a Deployment Plan is not rejected, this is the latest date by which suppliers must publish their Annual Milestones on their website.	

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Send us your feedback

We are keen to receive your feedback about this guidance. We would also like to get your answers to these questions:

Do you have any comments about the quality of this guidance?

Do you have any comments about its tone and content?

Was it easy to read and understand? Or could it have been better written?

Do you have any further comments?

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