Department for Energy Security & Net Zero

Smart Metering Policy Framework - Post 2025

Government response to a consultation on obligations for energy suppliers to improve smart meter operations and complete the domestic smart meter rollout by the end of 2030

March 2026

Contents

Interpretation

In this document:

‘communications hub’: a communications hub is installed in homes and businesses to connect the DCC's secure network to smart gas and electricity meters and allow smart meters and in-home displays to connect to each other. The communications hub typically sits next to or on top of the electricity smart meter.

‘customer-driven churn’ refers to consumers switching between energy suppliers as a result of the consumer’s active choice.

‘Data Communications Company (DCC)’: is the holder of the Smart Meter Communication Licences (currently Smart DCC Limited) and is regulated by Ofgem. It is responsible for linking smart meters in homes and small businesses with energy suppliers, network operators and energy service companies, via a centralised data and communications network.

‘DESNZ’ or **‘the department’** refers to the Department for Energy Security and Net Zero, that has published the consultation on behalf of the UK Government.

‘domestic’ refers to premises at which a supply of gas or electricity (or both) is taken wholly or mainly for a domestic purpose (see Gas Supply Licence and Electricity Supply Licence standard condition 6).

‘4G in the North’ refers to the extension of the fourth generation (4G) communication network into a defined northern region negotiated by the DCC.

‘Guaranteed Standards of Performance (GSOP)’ refers to regulations that require energy suppliers to meet specific service standards, such as fulfilling requests for appointments, and provide automatic compensation to consumers if they fail to do so.

‘In-Home Display (IHD)’ refers to the device that is offered alongside smart meters at installation, which displays near-real time energy consumption information in pounds, pence, and kilowatt-hours (kWh).

‘Home Area Network (HAN)’ refers to a wireless network used within homes or businesses to connect smart metering system devices in the premises which include communications hub, smart meters (electric and gas), In-Home Displays (IHDs) and Consumer Access Devices (CADs) and other devices.

‘non-domestic’ refers to designated premises in scope of the smart meter rollout. These are smaller sites with electricity meters in profile classes 1-4 or with gas consumption below 732 MWh per year.

‘Ofgem’ stands for the Office of Gas and Electricity Markets. It is the energy regulator for Great Britain and its role is to protect the interests of energy consumers.

‘Smart Energy Code (SEC)’ refers to a multi-party agreement which defines the rights and obligations of the DCC, energy suppliers, network operators and other relevant parties involved in the end-to-end management of smart metering in Great Britain.

‘Smart Energy GB (SEGB)’ is the organisation responsible for the delivery of national consumer engagement in relation to smart metering under Electricity and Gas Supplier Licence Conditions 45 and 39 respectively.

‘Smart meter operating in traditional mode' refers to a smart meter when it does not provide automatic meter readings, cannot be read remotely, and therefore has to be read manually like a traditional meter.

‘SMETS1’ (Smart Metering Equipment Technical Specifications - first generation) refers to the first generation of the technical specifications for smart metering equipment qualifying to meet licence rollout targets.

‘SMETS2’ (Smart Metering Equipment Technical Specifications - second generation) refers to the second generation of the technical specifications for smart metering equipment qualifying to meet licence rollout targets.

‘the government’ refers to the UK Government.

‘the Programme’ refers to the Smart Metering Implementation Programme which includes the department’s Smart Metering Team and the wider group of partners and stakeholders responsible for delivering the rollout.

‘the Targets Framework’ refers to the smart meter installation obligations under which suppliers were set annual smart meter installation targets from 1 January 2022 to 31 December 2025.

‘Smart tariffs’ refers to energy pricing plans that vary the cost of electricity based on the time of day.

‘Virtual WAN (VWAN)’ refers to an arrangement where, providing the consumer consents to the use of their broadband, smart meters can connect to the DCC via the internet. DESNZ and DCC have been working together to implement this arrangement for consumers that live in premises that have no WAN coverage.

‘we’ refers to the UK Government.

‘Wide Area Network (WAN)’ the WAN is used for communication between smart meters and the DCC via a communications hub, enabling (amongst other things) suppliers to receive meter readings remotely.

Executive Summary

Smart meters are an essential upgrade to our national energy infrastructure. They bring significant benefits to consumers and underpin a modern, clean and flexible energy system.

Smart meters help consumers take control of their energy use, cut their energy bills, and unlock the benefits of the transition to clean power. By supporting grid resilience and flexibility, they also play a vital part in the government's commitment to deliver Clean Power 2030.

The government is committed to ensuring that all consumers can benefit from smart meters as soon as possible. To support the Clean Power Mission and ensure no one is left behind, we consulted on a framework to enable the vast majority of consumers to have smart meters by the end of 2030.

To meet this ambition, the government previously introduced a four-year 'Targets Framework' from 2022 to end 2025, under which energy suppliers were set annual smart meter installation targets to the end of 2025.

Consumers are at the heart of the smart meter rollout. However, we know that not all consumers have received the quality of service that we expect across the country.[1] Improving the consumer experience of smart metering is a priority. We are working at pace alongside industry partners to improve smart meter services across all areas of Great Britain.

The proposals set out in the August 2025 'Smart Metering Policy Framework – Post 2025' consultation aimed to deliver a step-change in consumer experience, provide certainty to industry, and drive the completion of the rollout to support the transition to Clean Power. That means making sure that smart meters work as they should, transitioning the smart meter network to use the 4G communications network before the 2G and 3G communications networks are switched off by 2033, and ensuring the vast majority of consumers benefit from a smart meter by the end of 2030.[2]

Government decisions

We received 64 responses to the August 2025 consultation from a range of stakeholders, including consumer groups, delivery partners, energy suppliers, members of the public and trade bodies. We thank them all for their invaluable feedback and the supporting information they provided.

The large majority of respondents to the consultation were in agreement with the benefits of smart metering, and the principles of the consultation proposals, which were to deliver a high

[1] 8.3% of smart and advanced meters were operating in traditional mode at the end of September 2025: Q3 2025 Smart Meters Statistics Report
[2] Smart Metering Policy Framework – Post 2025 consultation

quality and improved consumer experience; provide certainty to enable investment and underpin the transition to Clean Power 2030; and provide delivery flexibility to the sector, whilst ensuring progress and accountability.

The majority of respondents agreed with the overarching framework proposed in the consultation, with some alternative views or caveats regarding specific proposals. These are covered in further detail in relation to the relevant consultation questions and responses below.

The decisions set out in this document reflect the responses received to the consultation, as well as the government's commitment to ensuring that all consumers can benefit from working smart meters as soon as possible. The key decisions are as follows:

- We will strengthen the existing Operational Licence Condition which requires energy suppliers to take all reasonable steps to ensure smart meters operate in smart mode, by requiring suppliers to take all reasonable steps to 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.
- We will clarify the existing Operational Licence Condition by explicitly requiring suppliers to take all reasonable steps to pre-emptively replace smart metering assets so that they continue to communicate when they will otherwise stop as a result of Wide Area Network (WAN) services ending, such as the switch-off of 2G and 3G mobile services by end of 2033. We will also require the Data Communications Company (DCC) to issue a 'Statement of Availability of Communication Services'. This statement will be required to clearly set out dates from when the DCC will not be able to provide SMETS1 and 2G/3G communication services.
- We will introduce an obligation for energy suppliers to take all reasonable steps to complete the domestic smart meter rollout by installing smart meters in all remaining domestic premises by the end of 2030. This will replace the current Targets Framework for domestic meters, which concluded at the end of 2025.
- We will require energy suppliers to submit annual deployment plans to Ofgem, outlining the activities they will undertake to meet their domestic installation, operational and replacement obligations.
- The annual milestones for new installations and pre-emptive replacements will be binding and without tolerances from January 2027. When assessing annual compliance with licence conditions, we expect Ofgem, as a reasonable Regulator, would consider a holistic approach to assessing performance which aims to ensure that licence holders demonstrate overall resilience and responsibility in managing their obligations.
- The time in which Ofgem will have the option to reject a deployment plan will be reduced from 40 days to 28 days.

Introduction

Smart metering rollout to date

Smart meters are upgrading Great Britain's energy system, bringing significant benefits to consumers, and playing a vital role in building a flexible and decarbonised power system.

Consumers are at the heart of the rollout, as smart meters bring an end to manual meter readings and estimated bills, whilst providing households with near-real time information which they can use to save energy and cut their bills. There is robust evidence from the rollout to date that consumers with smart meters are achieving sustained savings using their smart meters and In-Home Displays (IHDs) of 3% for electricity and 2.2% for gas credit.[3] This is particularly beneficial at a time of high global energy prices. In addition, the wider system savings enabled by smart meters flow back to help reduce all consumer bills.

Prepayment customers see particular benefits from smart meters, which enable consumers to top-up remotely as well as track their balance easily, reducing the risk that they unknowingly run out of credit. Smart prepayment meters also make it easier to access government cost of living support. For example, the £400 Energy Bills Support Scheme discount was applied automatically for those on smart prepay between October 2022 and March 2023, with no need to redeem a voucher.[4]

Smart meters help consumers unlock the benefits of clean power and clean technology like heat pumps, batteries and solar panels. Smart meters allow consumers to access the Demand Flexibility Service, which was launched by the National Grid Electricity System Operator (ESO) in winter 2022 and now runs year-round, and which rewards consumers for reducing their energy usage during Demand Flexibility Service events.[5] Smart meters enable consumers to access optional smart tariffs, which reward consumers for using electricity flexibly, and can be particularly beneficial for consumers using clean technology like heat pumps, batteries, solar panels and electric vehicles, for example saving electric vehicle customers up to £900 per year.[6] Smart meters also provide significant benefits for gas consumers. Mains gas is still prevalent in Great Britain, serving around 80% of premises and supplying a substantial portion of cooking and space heating energy needs. Gas forms a substantial part of both consumer savings and carbon reductions, and many of the benefits from smart meters – both for suppliers and for consumers – are realised when both fuels are served by smart meters, such as remote top-up for prepayment customers and more accurate billing without manual meter readings.

[3] Impacts of smart metering roll-out on household energy use
[4] Energy Bills Support Scheme GB: payments made by electricity suppliers to customers
[5] Demand Flexibility Service explained
[6] Table 1, Future default tariffs Call for evidence

The government is committed to decarbonising all sectors of the UK economy to accelerate the transition to net zero. A low carbon future will deliver benefits to the planet, the economy and energy security, and will significantly reduce household bills.

Smart meters underpin the cost-effective delivery of the government's commitment to achieve Clean Power 2030 and net zero greenhouse gas emissions by 2050. They enable a flexible modernised energy system, that changes the way we use energy and provides significant benefits to consumers and suppliers. A more flexible energy system will allow us to scale up the use of renewables and reduce reliance on imported fossil fuels, giving us greater control of our energy security. The data from smart meters is helping Distribution Network Operators (DNOs) to more actively plan and manage their networks, as well as respond to outages more quickly.

The government previously introduced a four-year 'Targets Framework' from 2022 to end 2025, under which energy suppliers were set annual smart meter installation targets. As of the end of September 2025, 70% of all meters are now smart or advanced meters.[7]

The smart meter rollout has delivered significant benefits to date, as found by recent analysis which showed that smart meters installed to the end of 2024 will deliver a total Net Present Value (NPV) of £2.2 billion over the appraisal period. Each new installation is expected to deliver additional net benefits.[8]

However, we know that not all consumers have received the quality of service that we expect across the country. Too many smart meters have not been operating in smart mode (8.3% of smart and advanced meters operating in traditional mode at the end of September 2025).[9] This means that some consumers are not receiving the full benefits of smart meters and we recognise that this can undermine trust in smart meters. Industry is responsible for installing smart meters and for ensuring they are working correctly, with suppliers responsible for smart metering assets, and the Data Communications Company (DCC) responsible for the smart metering communication network and service.

Principles for the Post 2025 Framework

As we move to the next phase of the smart meter rollout, our aim is to deliver a step-change in consumer experience, ensure a smooth transition to 4G communications, and give industry certainty to enable appropriate investment to continue to roll out smart meters at scale. This will ensure that, by the end of 2030, nearly all consumers will have working smart meters, to support the Clean Power 2030 Mission and to give consumers the positive experience they rightly expect and deserve.

[7] Smart meters in Great Britain, quarterly update September 2025 - GOV.UK
[8] 2011 prices, discounted to 2019. DESNZ (2025) Smart_Metering_2025_Costs_and_Benefits_Report.pdf
[9] Smart meters in Great Britain, quarterly update September 2025 - GOV.UK

The achievement of these aims means making sure that smart meters work as they should, transitioning the smart meter network to use the 4G communications network before the 2G and 3G communications networks are switched off by the end of 2033, and ensuring the vast majority of consumers benefit from a smart meter by the end of 2030.

Consultation proposals

With the Targets Framework coming to an end at the end of 2025, the consultation published in August 2025 sought views on the following requirements for energy suppliers to take all reasonable steps to:

- 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
- pre-emptively replace smart metering assets so that they continue to communicate when they will otherwise stop as a result of Wide Area Network (WAN) services ending, such as the switch-off of 2G and 3G mobile services by end of 2033
- complete the smart meter rollout by installing smart meters in remaining domestic premises by the end of 2030

We also consulted on an underpinning requirement for energy suppliers to submit annual deployment plans to Ofgem, outlining supplier domestic activities to meet their installation, operational and replacement obligations.

We gathered evidence on IHDs and other feedback tools, to better understand consumer and industry requirements for accessing real-time energy consumption data.

Proposals with respect to resolving smart meters operating in traditional mode and clarifying obligations to pre-emptively replace smart metering assets apply to both domestic and non-domestic energy suppliers.

A consultation on proposals to drive new smart meter installations in the non-domestic sector followed in October 2025 and closed on 16 January 2026.[10]

We look forward to engaging with stakeholders and to working together to deliver our shared objective of delivering a universal smart metering service across Great Britain that works for everyone by the end of 2030.

[10] Non-domestic smart meter rollout post-2025: consultation document (accessible webpage) - GOV.UK

Related measures

In addition to the core proposals in the consultation, we set out a number of measures which government, working with key delivery partners, is overseeing to improve the availability of smart metering, improve the consumer experience, and support consumer demand.

In addition to the measures described here, we will continue to consider other ways in which government policy can support the rollout, including further potential measures to support consumer experience, demand and conversion.

Improving the availability and reliability of smart metering services

4G in the CSP-North: The DCC now offers 4G communications in the CSP-North. This enables suppliers to use either the 4G mobile network or the Long-Range Radio network in the CSP-North, in support of improved first-time installation success rates.

DCC SMETS1 service contract extensions: The DCC has extended its contracts with key service providers to enable service provision for the majority of SMETS1 meters to 2033. This will allow energy suppliers to maximise the asset life of installed equipment and reduce early replacements.

Virtual WAN: In 2026 the DCC will launch a Virtual WAN (VWAN) service so that, with consumer consent, broadband can be used to connect homes without WAN coverage to the national communications network for smart metering. This means that remaining consumers who do not have a WAN service, but have broadband, may be eligible for smart meters.

4G communications hub only exchange site visits arrangements: In August 2025, the government published its conclusions on 4G communications hub only exchange site visit arrangements, along with proposals on the DCC charging mechanism and legal changes.[11] In September, Ofgem and DESNZ launched a joint consultation on the methodology for calculating the centralised reimbursement price for these visits, the conclusion to which was published in February on the Ofgem website.[12]

Consumer protections, experience and rights

Guide to consumers' rights and expectations: The government has published new guidance for consumers, setting out what they should expect from their smart metering experience.[13]

[11] Smart Metering Implementation Programme: DESNZ conclusions on 4G Communications Hub only exchange site visit DCC charging mechanism and legal changes - Smart Energy Code
[12] 4G Communications Hub only exchange site visits: proposed methodology for calculating a centralised price | Ofgem
[13] Smart meters: Your rights and expectations - GOV.UK

Guaranteed Standards of Performance: Ofgem has introduced new Guaranteed Standards of Performance (GSOP) for smart metering to support faster appointment fulfilment, smoother installations, and quicker support and resolution of post-installation issues which, if not met, will result in automatic compensation for consumers.

Consumer engagement: The national smart metering campaign, run by not-for-profit organisation Smart Energy GB (SEGB), has played a vital role in driving the uptake of smart meters to date. There will continue to be a need for a large-scale national consumer engagement campaign, underpinned by targeted and local activity, led by SEGB to support the rollout.

Tenants' rights: We are exploring ways to drive the uptake of smart meters amongst renters and are considering the primary powers that may be necessary to deliver any policy. To the extent that new primary powers are required, we will seek to identify an appropriate legislative vehicle which will be dependent on parliamentary time.

In-Home Displays: We used the August 2025 consultation to gather evidence on IHDs and other feedback tools. We will continue to engage with stakeholders to better understand consumer and industry requirements for accessing real-time energy consumption data.

Smart metering installation experience: In August 2025 we published a call for evidence to seek industry's views on how to enhance the consumer installation journey towards Clean Power 2030, including by looking at the potential to drive efficiencies or integration in both smart meter and low carbon technology (LCT) installations. We are currently reviewing all responses and will undertake further engagement with stakeholders on the initiatives proposed during 2026.

Local authority co-branding: SEGB has a range of campaign resources that are available for co-branding with local authorities and has worked with several local authorities to deliver targeted campaign activity on a number of occasions. We will continue to ensure such opportunities are available.

Further interventions to support consumer demand for smart meters

Flexibility and low carbon technology: The Clean Power 2030 Mission is expected to drive higher demand for smart metering benefits, such as smart tariffs, particularly for users of low carbon technology, as well as leveraging benefits provided by the Market-wide Half Hourly Settlement.[14] We note that, in line with the government's Warm Homes Plan, we expect low carbon technology use to rapidly increase across Great Britain in this period. We would encourage suppliers to make full use of these opportunities by deploying smart-contingent tariffs and related incentives.

14 An industry-led programme transitioning all consumers to half hourly meter readings, to allow a move to a smarter, more flexible energy system where settlement reflects actual real-time energy usage.

Energy efficiency funds: We have ensured advice on the benefits of smart meters was provided to recipients of retrofit measures, such as the Home Upgrade Grant, the Local Authority Delivery scheme, and the Social Housing Decarbonisation Fund.

The Future Homes and Buildings Standards (FHBS):
Government has consulted on enhanced guidance to help ensure that new builds are smart-meter-ready from the outset, and will publish its response to the consultation in due course.

Energy Performance Certificates*:* We have met our commitment to include a check for the presence of a smart meter when a full[15] or reduced[16] assessment of a home's energy and environmental performance takes place, with advice on how to get a smart meter reflected on the Energy Performance Certificates (EPCs) of properties where one is not present. Further to this, we are working towards reforming EPCs, including considering how and where to best reflect smart capability within future metrics.[17] A consultation was launched to this effect on 21st January 2026, including recommending smart meters are necessary to achieve a "Smart Readiness Metric" rating of C.

Minimum Energy Efficiency Standards (MEES) Regulations: Related to the wider EPC reform, consultations took place in 2025 on improving the energy efficiency of privately rented homes in England and Wales, and of socially rented homes in England. Both consultations sought views on actions the government could take to increase deployment of smart meters in the rented sector. The government published a summary of responses to the Social Rented Sector MEES consultation in January 2026.[18] The government also published a response to the Private Rented Sector MEES consultation in January 2026.[19]

Electric vehicles: We will continue to work with stakeholders to raise awareness that smart meters enable smart tariffs which can help reduce the cost of charging for electric vehicle users, such as updated advice on the Energy Savings Trust website.[20]

Heat pumps: We are working to ensure that relevant information is provided to householders having heat pump installs, with messaging on the benefits of smart meters now provided as part of a new government webpage which supports a clean energy consumer campaign.[21]

Smart Export Guarantee (SEG): A smart meter or an export meter capable of half-hourly readings is required under the Smart Export Guarantee scheme, which replaced the Feed-In Tariffs scheme.

[15] SAP 10.2 specification 14-03-2025
[16] RdSAP 10 Specification 10-06-2025
[17] Home Energy Model: Future Homes Standard assessment - GOV.UK, DESNZ (2023)
[18] Consultation outcome: Improving the energy efficiency of socially rented homes in England: summary of consultation responses. – GOV.UK, DESNZ (2026)
[19] Consultation outcome: Improving the energy performance of privately rented homes: government response – GOV.UK, DESNZ (2026)
[20] Electric vehicles: all you need to know - Energy Saving Trust
[21] Save energy in your home - Clean Energy Homepage

Consultation events

Following publication of the consultation in August 2025, the department conducted 6 stakeholder engagement events as well as a series of bilaterals during September and October 2025. Stakeholders involved included large and small energy suppliers covering the domestic sector, consumer groups, trade bodies, meter installer organisations, and other delivery partners.

The stakeholder engagement events were organised to ensure attendees had the opportunity to understand the consultation proposals and their implications, and to address points for clarification. A summary of post-publication engagement is given in Table 1 below.

Table 1: Post-publication stakeholder engagement events

Date	Organisation Type
02/09/2025	Consumer Reference Group (CRG): large/ medium energy suppliers, consumer groups and other industry stakeholders
04/09/2025	Smart Metering Delivery Group (SMDG): large/ medium energy suppliers and consumer groups
09/09/2025	British Electrical and Allied Manufacturers' Association (BEAMA) and Energy and Utilities Alliance (EUA) trade associations
09/09/2025	Energy Networks Association and DNO smart leads
10/09/2025	Independent Suppliers and Meter Equipment Managers Forum (ISMF): small energy suppliers and smart metering supply chain
10/09/2025	Community of Meter Asset Providers (CMAP)
Sept-Oct 2025	We also held a series of bilaterals with energy suppliers and other stakeholders

Consultation responses

The closing date for the consultation was 3 October 2025. A total of 64 responses were received. A list of individual respondents can be found in Annex A of this document. Table 2 below provides a summary of respondents by type.

Table 2: Summary of consultation responses (by respondent type)

Organisation Type	Number of respondents	Percentage of Total
Consumer Group	5	7.8%
Delivery Partner	4	6.3%
DNO / Energy Transporter	2	3.1%
Energy Supplier	13	20.3%
Individual / Community Group	15	23.4%
Meter / IHD Manufacturer	5	7.8%
MOP / MAP	4	6.3%
Other	10	15.6%
Trade body	6	9.4%
TOTAL	**64**	**100%**

This document provides high-level summaries of the responses to each of the 18 consultation questions. It sets out the government's response to each of the questions and confirms our intentions for the Post 2025 Smart Metering Policy Framework. Section One covers Questions 1 – 4. Section Two covers Questions 5 – 8, Section Three covers Questions 9 – 11, Section Four covers Questions 12 – 17 and Section Five covers Question 18. There is an overall conclusion summarising the government decisions at the end of each section.

Questions

Question	Questions as consulted on in August 2025
Q1	What evidence can you provide on both the cost savings and energy consumption savings to consumers of non-IHD feedback tools in comparison to IHDs? Are these realised for all groups of consumers?
Q2	Thinking about the current role of IHDs and how this could evolve; is there evidence of the role that additional functionality may play in supporting a more flexible and dynamic Clean Power system?

Q3 What evidence can you provide on additional, broader benefits to consumers of non-IHD feedback tools in comparison to IHDs? Please make reference to specific functionality and features of non-IHD feedback tools in your response, where appropriate.

Q4 What evidence can you provide on the specific needs of vulnerable and low-income consumers in relation to feedback tools, including IHDs?

Q5 Do you agree that we should introduce an obligation on energy suppliers to take all reasonable steps to recover smart meters operating in traditional mode, in both domestic and non-domestic sectors, as soon as possible and no later than 90 days, building on the existing obligation on suppliers requiring they maintain all smart meters in smart mode? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

Q6 Do you agree that we should amend the Operational Licence Condition to require suppliers pre-emptively replace communication hubs (and any associated smart metering equipment) by prescribed dates, supported by a new obligation on DCC under their Licence to issue a statement of dates setting out when DCC will no longer be able to provide specific communication services, so it is clear by when suppliers need to have completed replacements in order to avoid any impact on consumers? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

Q7 Do you agree with proposals to clarify that the existing smart metering Operational Licence Condition (SLC 49 electricity and SLC 33 gas) applies to all SMETS meters in designated premises moving forward? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

Q8 Do you have views on any nuances specific to the non-domestic sector which interact with the proposals to introduce an obligation on energy suppliers to take all reasonable steps to recover smart meters operating in traditional mode within 90 days, and to amend the Operational Licence Condition, supported by a new obligation on DCC under their Licence to issue dates, so it is clear by when suppliers need to pre-emptively replace smart metering systems before relevant communication services terminate? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

Q9 Do you agree with the proposed All Reasonable Steps obligation for energy suppliers to complete the domestic rollout by the end of 2030 set out in Section 2. We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

Q10 What are your views on the benefits and risks of the approaches, outlined under 'Alternative approaches considered'? Please provide evidence and rationale to support your answer.

Q11 Do you agree with the proposal to extend the Data Request powers to five years after 31 December 2030? Please provide rationale and evidence to support your answer.

Q12 Do you agree that we should require energy suppliers to provide Ofgem with annual deployment plans and report progress against those deployment plans, with annual milestones setting out what activities they will undertake each year for the domestic sector, to meet their smart meter installation, pre-emptive replacement, and operational obligations? If you disagree, please suggest alternative approaches that would enable monitoring and achieve accountability to ensure energy suppliers take sufficient action each year to meet the obligations set out in Sections 1 and 2 of the consultation. We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

Q13 Do you agree that (a) the annual milestones for new installations and pre-emptive replacements should be binding and without tolerances, and (b) the annual milestone for smart meters operating in traditional mode should be non-binding? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

Q14 Do you agree that energy suppliers should (a) be required to submit updated deployment plans annually, and (b) be able to request re-submission to Ofgem in-year, in response to exceptional events that have a significant and negative impact on their ability to meet their annual milestones? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

Q15 Do you agree that the date from which the annual milestones for new installations and pre-emptive replacements should be binding is 1 January 2027? If you disagree, please provide an alternative earliest date, including rationale for how this would be achieved.

Q16 Do you agree with the following measures to ensure deployment plans are of high quality and provide confidence that suppliers will meet their obligations:

a. Ofgem should be given the option to reject the plan and the option to provide guidance to suppliers on when it might reject the plan? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

b. That suppliers should be required to provide evidence to support justification of the annual milestones, including justification for any numerical difference between the milestones provided for new installations and pre-emptive

replacements, and a straight-line path to the relevant end-date, and supporting information on workforce and consumer engagement? Are there additional quantitative or qualitative information requirements that should be included in the deployment plan to support the assessment and justification of milestones? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

c. Do you agree that each supplier's deployment plan should be (a) approved by the supplier's Board and (b) milestones and progress against those milestones published on the supplier's website? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

d. If you disagree, with Q16. a), b) or c), are there alternative or additional design approaches that would reduce the risk of activities concentrated towards the end-dates within the plan and/ or to subsequent revisions to that plan? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

Q17 Do you agree that all energy suppliers, except those that supply gas or electricity, or both, to domestic sector customers via, in each case, fewer than 20,000 energy meter points, should be required to submit deployment plans? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

Q18 Do you agree that the legal drafting (in Annex B) implements the policy intentions proposed in Section 1, Section 2 and Section 3 of this document? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

Section One: Delivering a high-quality, improved consumer experience

It is a priority of the government to improve the consumer experience of smart metering and is working at pace alongside industry partners to share best practice and improve smart meter connectivity across all areas of Great Britain.

The decisions set out in this Government Response will strengthen consumer experience by driving installations, unlocking the benefits of smart metering for consumers who have not yet taken up the offer, and by placing clear requirements on energy suppliers to take more urgent action on maintenance, repair and replacement activity that will keep consumers benefitting from smart meters long into the future.

In August 2025 we set out a range of additional work to complement the policy proposals in the consultation. This included publishing a new guide to consumers' rights and expectations - helping all consumers understand what they should expect from their end-to-end smart metering experience, and working closely with Ofgem on the development of their new Guaranteed Standards of Performance (GSOP) for smart metering, which see consumers compensated when certain standards of service are not met.

We also summarised how, to progress the rollout in the private rented sector, the government will continue exploring ways to strengthen the rights of domestic tenants to request a smart meter and will work closely with industry to ensure consumers using traditional prepayment meters are not left behind in the transition to smart meters. These activities are underpinned by the continued need for targeted consumer engagement campaigns, and the vital role that SEGB will play in the next phase of the smart meter rollout.

Although we did not consult on new consumer measures as part of the Framework, many respondents highlighted a range of consumer topics in their response, reflecting strong stakeholder engagement and interest in ensuring all consumers can receive the benefits of smart metering.

Guaranteed Standards of Performance for smart metering

In the consultation, we highlighted recent proposals by Ofgem to introduce new GSOPs for smart metering, on which Ofgem were consulting at the same time. We explained how the objectives of those proposals aligned with the policy proposals set out by the DESNZ smart metering policy framework and asserted our support for initiatives designed to compensate consumers who experience poor service. We consider that Ofgem’s GSOPs will be essential in helping to drive better performance and increase consumers’ trust and confidence in smart metering.

Respondents to the consultation provided general feedback on Ofgem's proposals as well as specific feedback where Ofgem's proposals directly interacted with our own. This response document will not cover views which only pertain to the GSOP proposals, since they were not in scope of the consultation and given these views will also have been shared with Ofgem as part of their consultation. Ofgem published their Final Decision on 30 January 2026, which includes further detail on the proposals being taken forward. Where feedback highlighted ways the Ofgem proposals may interact with our own, we have responded to those points in the relevant section below.

It remains our view that the smart metering policy framework and GSOP proposals can not only exist alongside one another but can directly complement one another. We have worked closely with Ofgem to ensure the policies are fully aligned and mutually effective.

A continued role for coordinated consumer engagement campaigns

In the consultation, we set out our views on the importance of having a coordinated national campaign of multi-channel consumer engagement for the next stage of the smart metering rollout. The role of the national smart metering campaign, run by not-for-profit SEGB, was not in scope of the consultation. A few energy supplier responses did however offer views on the role of SEGB.

The government's position is unchanged: the national campaign run by a central delivery body has already provided value for money; it will continue to be vital in converting the remaining third of consumers to smart meters; it will be needed to engage those who already have smart meters to accept maintenance activity associated with the 4G transition and to maximise the benefits of behaviour change.

While we used the consultation to indicate the type of work SEGB would need to be doing once the current Targets Framework ends, SEGB's Board, on which representatives of large energy suppliers and consumer groups sit, has overall accountability for ensuring SEGB achieves its objectives. Moreover, SEGB has established and is held accountable to its Performance Management Framework, which sets and monitors SEGB's performance against key metrics and targets. We are satisfied that existing governance structures allow different parties to appropriately influence and shape SEGB's direction and activities to meet its objectives. We encourage energy suppliers in particular to continue engaging through these channels.

Consumers in vulnerable circumstances

Several respondents highlighted the importance of ensuring that consumers with disabilities and those in vulnerable circumstances are fully supported across all areas of the smart meter rollout. This remains a core principle of the smart meter rollout, which is inclusive by design, and is underpinned by comprehensive and robust consumer protections principally set out in the Electricity and Gas Supply Licence Conditions (SLCs).

Energy suppliers are obligated to treat all domestic consumers fairly and, as part of this, are required to identify and respond to the needs of those in vulnerable situations (SLC 0). Suppliers must also establish and maintain a Priority Services Register (SLC 26) and there are specific protections for consumers whose smart meters are in prepayment mode and may be at risk of self-disconnecting, (SLCs 27a and 28).

The installation process for smart meters is set out in the Consolidated Metering Code of Practice (CoMCoP), which is part of the Retail Energy Code. CoMCoP requires that domestic energy meter installers receive training to understand how and when a consumer might be classed as vulnerable, are able to identify potential vulnerability cases, and offer guidance which is responsive to the consumer's needs. Where a consumer has been identified as potentially vulnerable by the energy company, this information should be passed onto the installer to ensure that the design of the visit is appropriate for their needs.

Energy suppliers are required to provide communications in a format that is appropriate for the needs of the consumer, for example, those with a visual impairment or for whom English is not their first language. Web accessibility is also important, and we note that SEGB and all large energy suppliers have stated a commitment to ensuring their websites and mobile applications are accessible and inclusive and provide assistive technology tools and services such as SignVideo Relay for BSL users.

Accessible IHDs (AIHDs), which contain additional accessibility features, are also available and the government strongly encourages energy suppliers to ensure these are offered to consumers who may benefit, including when requested after the smart meter installation date. Energy suppliers and their partners should ensure that their installers carry AIHDs, are trained in their use, and can proactively identify where a consumer may benefit from one.

DESNZ and Ofgem are committed to ensuring that consumers in vulnerable circumstances and those with accessibility needs receive whatever additional support is necessary to help realise the benefits of smart meters, which are particularly effective for these types of consumers. We will continue to work closely with a range of organisations, including Citizens Advice and National Energy Action, to monitor supplier performance and make appropriate interventions if issues arise. We also welcome opportunities to further engage other stakeholders who have responded to the consultation to identify new opportunities to engage different audiences.

Question 1

Summary of responses to Questions 1-4

What evidence can you provide on both the cost savings and energy consumption savings to consumers of non-IHD feedback tools in comparison to IHDs? Are these realised for all groups of consumers?

Thinking about the current role of IHDs and how this could evolve; is there evidence of the role that additional functionality may play in supporting a more flexible and dynamic Clean Power system?

What evidence can you provide on additional, broader benefits to consumers of non-IHD feedback tools in comparison to IHDs? Please make reference to specific functionality and features of non-IHD feedback tools in your response, where appropriate.

What evidence can you provide on the specific needs of vulnerable and low-income consumers in relation to feedback tools, including IHDs?

We are grateful for all views and information provided in response to the consultation questions relating to energy consumption feedback tools. While a range of views and experiences were shared, respondents provided limited new evidence, with some referring to existing public research already known to the department. Several organisations indicated a willingness to share further findings from internal research on a bilateral basis.

The consensus among respondents was that energy feedback tools enable consumers to realise the benefits of smart meters, supporting both energy usage monitoring and cost savings, and contributing to a more flexible and dynamic energy system. However, views differed on the most appropriate types of feedback tool and the circumstances in which they should be provided.

Current requirement to offer IHDs

Generally, energy suppliers called for a change to the current requirement to offer an IHD to all consumers at the point of installation and to maintain it for the following 12 months, advocating instead for the provision of more digital-based tools, including the use of Wi-Fi enabled Consumer Access Devices (CADs). However, consumer groups and IHD manufacturers cited evidence of the ongoing benefits of IHDs and AIHDs, raising concerns that removing the requirement to offer them could risk excluding, in particular, vulnerable consumers.

Consumer engagement

Some respondents noted that IHDs remain widely used, citing recent research by Citizens Advice which found high levels of regular engagement with IHDs among consumers who were provided with one.[22] However, some respondents indicated a proportion of consumers do not use IHDs over the long term, with some noting that such consumers may have already developed energy-saving habits using the information provided by their IHD and therefore no longer need to refer to it. Other respondents argued that this suggested a lack of demand for ongoing access to the data provided by IHDs, and that alternative feedback tools were able to provide more detailed insights.

[22] Get Smarter: Ensuring people benefit from smart meters

Benefits of IHDs

Several respondents noted the benefits of IHDs for consumers, highlighting that the accessibility of near real-time information about their energy usage and costs supports greater awareness, enabling informed decisions and positive behaviour changes that can contribute to household savings and reduced consumption.

These respondents also noted that access to a physical feedback tool with an ambient display screen, whether it be an IHD or AIHD, enables all consumers in the household, regardless of ability or circumstances, to engage with their energy consumption data without having to seek it out, for example by opening an application on their smartphone.

Additionally, respondents noted that the interoperability of SMETS-compliant IHDs supports switching behaviour, and the use of the Home Area Network (HAN) means they are not dependent on the mobile phone network or internet coverage.

Many respondents argued that IHDs and AIHDs are of particular benefit to vulnerable consumers, especially those with accessibility needs related to visual impairment, pensioners, digitally excluded consumers, and those in low-income households.

Consumer confidence around the use of IHDs

Some respondents who were generally supportive of IHDs raised concerns around cases where consumers, after accepting an IHD, had not been provided with a demonstration or sufficient support on how to use them as required under the current regulations. These respondents emphasised the importance of ensuring consumer confidence in using an IHD, in order to maximise engagement with their energy consumption and mitigate against the potential loss of benefits.

Benefits of other energy feedback tools

Some respondents argued that, due to limitations in its functionality, the IHD is less suited to the more flexible Clean Power energy system we are moving towards. Some respondents referred to other energy feedback tools currently in use, such as CADs and mobile apps, that could offer more detailed insights to help consumers contextualise and understand their energy consumption and may be more suitable for providing enhanced benefits to consumers and supporting the energy transition. Some respondents noted that the increased functionality and greater insights offered by these tools would particularly benefit consumers on flexible energy tariffs, those using low-carbon technology or wider smart household systems, those who wished to monitor energy consumption while outside of the home, and vulnerable and low-income consumers.

Respondents discussed the increased potential for innovation in the evolution of these feedback tools compared to IHDs, suggesting that features such as push notifications communicated over an internet connection could alert consumers to network problems or turn-down events. Respondents also noted that, unlike an IHD’s HAN interface, devices such as CADs could overcome connectivity issues by offering Wide Area Network (WAN) and Virtual WAN (VWAN) capabilities.

Furthermore, unlike physical devices, mobile apps can be updated regularly with new features, offering increased longevity. Some energy suppliers also shared a view that other feedback tools can be cheaper to offer than IHDs and create less waste.

When considering the benefits of feedback tools generally, many respondents acknowledged that IHDs and non-IHD feedback tools can be complementary, with some highlighting the benefits of using a combination of a digital and physical device. A few respondents had seen evidence that the highest energy savings can be achieved when consumers use multiple feedback tools, such as an IHD along with a mobile app, or a CAD linked to a mobile app.

When considering the continued relevance of IHDs, some respondents noted an increase in the use of digital-only feedback tools, such as mobile apps, offered by energy suppliers and third parties. A few respondents observed a significant recent increase in digital skills and smartphone access, arguing that app-based tools are already the norm in other sectors, and therefore smart metering should begin to follow suit.

Supporting the needs of vulnerable consumers

When asked how feedback tools, including IHDs, could best support the needs of vulnerable and low-income consumers, relatively limited evidence was provided by respondents on the extent to which they could do so. Whilst a large number of respondents highlighted the need to provide an accessible feedback tool, a few shared the view that accessibility should be fundamental to the design of all energy feedback tools and digital platforms. A few respondents called for further research into the needs of vulnerable consumers, specifically their use of digital platforms and smartphones, before considering whether to extend the provision of dedicated accessible feedback devices.

The principle of consumer choice was widely supported by many different stakeholders, recognising the diversity of consumer preferences and circumstances and suggesting that households should have the opportunity to select the feedback tool that best meets their needs. Energy suppliers were generally supportive of this principle, with some arguing that they were better placed to respond to the needs of the customer base, integrate products with other services they provide, and deliver greater benefits. However, as there are no requirements for interoperability with supplier-specific tools, other respondents raised concerns that this may discourage customers from switching supplier.

A range of respondents agreed that, should the current requirement for offering IHDs and AIHDs be reviewed, they should remain available to consumers who want or could benefit from one. However, responses were mixed around the demand and availability of AIHDs. Many energy suppliers reported a decrease in demand, while several consumer groups raised concerns around cases where, despite suppliers being required to support vulnerable consumers, AIHDs were not available or offered to consumers during installation or were not supplied when consumers had requested one.

Government response to Questions 1-4

The government is clear that all consumers with smart meters should be able to easily access and engage with their energy consumption data. The feedback provided by IHDs is a key enabler in helping consumers save energy and manage bills by monitoring their energy use in near-real time through a widely accessible, easy to use device. There is evidence that regular use of an IHD supports households in reducing their energy consumption.[23] [24]

We recognise, however, that there have been changes in general consumer behaviour since the introduction of IHDs, partly driven by increasing levels of digital access and literacy. We also recognise that the needs of different households may have changed in that time, for example, as more consumers adopt smart meter-enabled flexible tariffs. These points were raised by some respondents to indicate that there should now be greater support for alternative digital feedback tools, such as mobile apps. However, the government remains mindful of other factors to consider, including consumers' digital confidence and digital platform accessibility. We believe it is not enough to consider smartphone ownership alone; we must also understand how frequently and effectively consumers use their devices.

The government believes that no consumer should miss out on the benefits of engaging with their energy use due to digital exclusion or any other barrier. We expect industry to support our ambitions to deliver a fully accessible smart meter rollout and to meet its obligations towards the specific needs and safeguarding of vulnerable and low-income consumers. Currently, this includes ensuring the provision of an AIHD for those consumers who may benefit from them and providing all consumers with a demonstration of how to use their IHD or AIHD at the point of smart meter installation.

We will continue to monitor the availability, usage and potential of different energy feedback tools, including IHDs, and commit to undertaking further engagement with key stakeholders in 2026 in light of the diverse views received through the consultation. We will seek further evidence on how the specific needs of different consumers, especially those who are vulnerable and low-income, can be met through different energy feedback tools without compromising on delivering smart metering benefits.

Section One - Conclusion

DECISION 1: We will continue to monitor the availability, usage and potential of different energy feedback tools, including IHDs, and commit to undertaking further engagement with key stakeholders in 2026. We will seek further evidence on how the specific needs of different consumers, especially those who are vulnerable and low-income, can be met

[23] Reviewing energy supplier evidence on impacts of smart metering on domestic energy consumption
[24] Impacts of alternatives to In-Home Displays on customers' energy consumption

through different energy feedback tools without compromising on delivering smart metering benefits.

Section Two: Ensuring consumers benefit from operating smart meters

Question 5

Summary of responses to Question 5

Do you agree that we should introduce an obligation on energy suppliers to take all reasonable steps to recover smart meters operating in traditional mode, in both domestic and non-domestic sectors, as soon as possible and no later than 90 days, building on the existing obligation on suppliers requiring they maintain all smart meters in smart mode? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

	Agree	Agree with Caveats	Neutral	Disagree with Caveats	Disagree	No Response
Respondents	12	21	1	2	14	14

Of a total of 64 respondents, 50 provided an answer to this question. Of those, a majority (66%, 33 of 50) agreed, or agreed with caveats, with the proposal to introduce an obligation on energy suppliers to take all reasonable steps to recover smart meters operating in traditional mode, in both domestic and non-domestic sectors, as soon as possible and no later than 90 days. A minority (32%, 16 of 50) disagreed, or disagreed with caveats, and the remaining one response was neutral.

Respondents generally supported the proposal as a means of improving consumer experience and providing clear expectations on the timeframe for recovering smart meters operating in traditional mode.

Some disagreement centred on the interaction with Ofgem's proposals for new Guaranteed Standards of Performance (GSOP) relating to smart metering, specifically the proposal to require suppliers to address smart meters operating in traditional mode within 90 days or pay compensation to consumers.

A few respondents argued that the proposal is unnecessary, as the current Operational Licence Condition already requires all reasonable steps to be taken to resolve smart meters operating in traditional mode.

Views were also shared on premature replacements, exemptions and the proposed timeframes.

90-day timeframe

Some respondents agreed with the 90-day period, considering it a sensible requirement to ensure that smart services are restored for consumers as soon as possible. Several acknowledged that 90 days was appropriate, even though they recognised that some problems may be beyond the supplier's control. One respondent noted their own findings that at least a third of issues can be fixed remotely and suggested amending the 90-day requirement to include a further mandate to attempt recovery of smart meters operating in traditional mode remotely within 7 days.

Some respondents argued the timeframe should be shorter, arguing that 90 days is a significant period for a customer with a pre-payment meter or a Time of Use or Electric Vehicle (EV) tariff to not work as it should, which could result in significant costs or lost savings for consumers. Such respondents also suggested that vulnerable customers should be prioritised.

Some respondents who disagreed with the proposed timeframe suggested that a longer period may be necessary due to reliance on external factors such as consumer availability and engagement with the Data Communications Company (DCC), along with balancing this work with ongoing obligations to complete the rollout. Some noted that Ofgem's proposed 90-day GSOP proposed an additional 30 days for engagement with the DCC where there are Wide Area Network (WAN) issues.

Exemptions and extensions

A small number of respondents argued that the proposal should not apply to gas meters, with one referring to industry comparators showing that gas smart meters are twice as likely as electricity meters to not be operating in smart mode. A few respondents noted that gas meters require both WAN and Home Area Network (HAN) to function, and therefore it should be made clear that the obligation only applies where it is technically possible.

One respondent suggested a nuanced approach, distinguishing between meters that previously communicated with the DCC but had lost functionality, which would fall under the recovery obligation, and those that have never communicated, which should be resolved via a different measure to avoid diverting resources away from restoring meters. Another noted that they considered the proposals were not consistent with the existing requirements in the supply licence regarding reactive 'install and leave', whereby suppliers are required to take all reasonable steps to fulfil obligations at the relevant premises as soon as reasonably practicable after the notified date, the notified date being when the DCC has confirmed to the supplier that there is WAN coverage at the premises. The respondent noted that, in these circumstances, suppliers should not be expected to establish a smart connection until the DCC has notified the supplier that they have resolved the WAN issue. The responses regarding the exemptions and extensions proposed in Ofgem's 90-day GSOP proposal are covered in the 'Interaction with Guaranteed Standards of Performance' section below.

Customer refusal and disengagement were also noted as factors for consideration, with two respondents arguing that customer refusal or disengagement contributed to the overall figure of smart meters operating in traditional mode, such due to a lack of customer response to suppliers' communications requesting that they book an appointment to address their smart meter operating in traditional mode.

Interaction with Guaranteed Standards of Performance

Respondents generally agreed with the introduction of the 90-day obligation in Operational Licence Conditions on its own. However, some argued that introducing the 90-day obligation in both the Operational Licence Condition and as a GSOP may lead to suppliers being penalised twice for the same infraction, as they would be at risk of enforcement action from Ofgem for breaching the Operational Licence Condition, as well as having to pay compensation to the customer under the GSOP regulations.

A small number of respondents considered it was important that the 90-day proposal in Operational Licence Condition and the 90-day proposal in the GSOP were aligned. A few respondents noted the absence of exemptions for suppliers where the reason for the meter not operating in smart mode was out of suppliers' control, highlighting that Ofgem's 90-day GSOP allows for an additional 30 days in such circumstances, or includes an exemption in the case of the customer not completing the required action.

One respondent called for consistency between Ofgem, the department and Smart Energy Code (SEC) on the interpretation of the proposal and clarity around whose responsibility this was, adding that clear and agreed definitions of "all reasonable steps" and "technical issues" must be provided in relation to smart meters being prevented from operating in smart mode.

Operational impact

A few respondents noted workforce shortages as an issue, highlighting that energy suppliers are lacking trained engineers due to redundancies as well as competing obligations, such as heat pump installations. One respondent claimed the lack of trained engineers is particularly apparent in remote and rural areas, where poor planning by suppliers has also been a contributing factor.

A small number of respondents raised concerns that the proposals could lead to premature replacement of smart meters without identifying the root cause of the issue, which may not be the meter itself, resulting in unnecessary costs and time for suppliers. Respondents raised concerns around the risk that premature replacement could result in smart meters reverting to traditional mode, as the root cause was unidentified. One respondent suggested that any issues raised by suppliers with the DCC should only be closed once the supplier has received communication from the meter as expected.

A small number of respondents raised concerns about increased costs, such as energy suppliers being liable for premature replacement charges to meter asset providers (MAPs) unless they can demonstrate a fault with the meter.

Non-domestic sector

More details on the inclusion of the non-domestic sector in this proposal, and any nuances raised by stakeholders with respect to these aspects, are addressed in Question 8.

Government response to Question 5

90-day timeframe

We confirm that we are proceeding with the proposal to require suppliers to take all reasonable steps to resolve smart meters operating in traditional mode as soon as possible and within 90 days.

We remain of the view that 90 days is a reasonable period to set within which to resolve a smart meter operating in traditional mode. Most cases require a site visit following triage by suppliers, the DCC and other industry parties to diagnose and address the underlying issue. These steps (identifying the root cause, scheduling an appointment, and completing the onsite work) represent similar operational processes that suppliers follow for a standard smart meter installation, with the addition of diagnostic and coordination activity beforehand. As respondents provided limited evidence to justify either shorter or longer timeframes, we have relied on established expectations for how long these activities should ordinarily take.

Ofgem's 8 August 2025 statutory consultation states, in response to their 28 March 2025 consultation on GSOPs, that 'the majority of respondents agreed that six weeks was a reasonable timeframe in which to fulfil most requests for a smart meter installation appointment, and a small number suggested other timeframes would be preferable'.[25] This suggests that six weeks is considered a reasonable timeframe in which to undertake a site visit. We see no reason why a site visit to resolve a smart meter operating in traditional mode should take longer than a site visit for a new installation. In a 90-day timeframe, suppliers would have 48 days, over and above the six weeks (42 days) considered reasonable for site visits, to undertake any additional actions needed for resolution, such as triaging or resolution with the DCC.

We can see the arguments for shortening the 90-day period on the basis that we want any consumer detriment to be minimised. Historically a proportion of smart meters operating in traditional mode have been fixed remotely, and given this precedent, we could expect that a proportion could be resolved remotely in the future and so potentially more quickly than the 90-day requirement.

We consider the proposed requirement achieves an effective balance by setting a feasible target that enhances consumer services while recognising the length of time that may be required for resolution. As a 90-day requirement obliges suppliers to take all reasonable steps to resolve smart meters operating in traditional mode '*as soon as possible* and no later than 90 days from the date they first become aware of an issue' (emphasis added), it therefore covers

[25] Supplier Guaranteed Standards of Performance: Statutory Consultation

the cases which can be resolved more quickly than 90 days. We expect suppliers to act as quickly as possible in all circumstances, which should mean that the length of time it takes for resolution would be determined by the minimum time taken to resolve technical issues, including where action is needed from other parties (e.g. DCC or consumer acceptance of a site visit). We would also expect suppliers to have regard to the circumstances of their consumers, particularly vulnerable consumers.

We propose the 90-day limit should be triggered as soon as suppliers become aware the smart metering system (SMS) is not operating in smart mode. We would, for example, expect the triggers to include but not be limited to: becoming aware at the time of installation (e.g., meter cannot be commissioned on the day), customer notification, change of supplier (e.g., supplier is unable to take over operation of the meter on the change of supply date), loss of remote meter reads and via DCC non-communicating devices reports or a supplier's own reporting on smart meter health.

Exemptions and extensions

We acknowledge the concerns that suppliers raised regarding external factors that may hinder their ability to meet the 90-day recovery requirement. However, we consider that, as the obligation is to take all reasonable steps to resolve within 90 days, it already provides sufficient flexibility for circumstances where a supplier could have been found to have taken all reasonable steps and yet taken longer than 90 days to resolve the smart meter operating in smart mode, such as due to factors beyond the supplier's control.

As regards reactive No WAN 'install and leave' scenarios, we note that the forthcoming introduction of Virtual WAN (VWAN) will provide suppliers with the opportunity to offer this to consumers, subject to consumer consent, where there would otherwise be no other means of establishing a WAN connection.

We will proceed with applying the same 90-day timeframe to both gas and electricity smart meters. This will require consistent high consumer service standards delivered by energy suppliers to recover smart services, irrespective of whether it is the gas or electricity smart meter operating in traditional mode. For gas meters which are affected by HAN issues, remote actions are less likely to be effective, which means the supplier can move straight to arranging a site visit (removing the time requirements for further triage), and once on site there are a number of technical solutions available, depending on the cause of the issues.

We further note that the intention of the 90-day timeframe is to drive improvements in how quickly smart meters operating in traditional mode are resolved, rather than reflect the maximum length of time that processes may currently take. We note that efforts are already taking place within cross-industry groups to ensure processes align with the 90-day timeframe. These efforts, which include improved triage and accountability mechanisms, enhance confidence that smart meters not operating in smart mode will be resolved in a timely manner.

We are continuing to look at what additional amendments to SEC and / or the DCC Licence would be helpful over and above the amendments the SEC Panel are already pursuing to

support clear accountability lines and ensure the identification, triage and resolution of smart meter incidents arising as a result of WAN coverage are resolved in a timely way.

Interaction with Guaranteed Standards of Performance 90-day proposal

Ofgem have consulted on introducing new GSOPs for smart metering, which will see suppliers automatically compensate consumers when certain levels of service are not met.

In their Final Decision Document in January, Ofgem announced that they would bring the GSOPs referred to as 'GSOPs 1-3' in straightaway – under which consumers will be compensated if: a supplier does not offer the consumer an appointment for a new smart meter installation within six weeks of the request being made; smart meter installation fails due to a fault within the energy supplier's control; and if the energy supplier does not complete an initial assessment, take an appropriate action and offer to update the consumer, within five working days of the consumer reporting a problem. These GSOPs have been in place since 23 February 2026.

Ofgem outlined that they intend to take forward further work on GSOP4 – under which consumers will be compensated if a consumer's smart meter is not operating in smart mode for over 90 days – with a view to implementing it later this year subject to successfully working through the accountability, technical and regulatory issues raised through the Statutory consultation.

We will continue to work closely with Ofgem to ensure alignment between the two policies. We and Ofgem still believe automatic compensation could be a powerful way to incentivise industry to ensure smart meters are working in smart mode and to fix issues quickly.

As regards the points raised in relation to the interactions between our 90-day proposal and GSOP4, we note that it is common to have both Licence Conditions and a GSOP addressing the same outcome. For example, the requirement to issue a final bill to a consumer within six weeks of them switching supplier is both a Licence Condition and a GSOP.

We remain of the view that the resolution timeframe obligation in Licence Conditions would complement any corresponding resolution timeframe GSOP. We consider it is right for energy suppliers to be held to account through clear and robust obligations set out in Licence Conditions, and for consumers to be able to access redress if issues occur. Bringing equivalent proposals into Licence Conditions strengthens Ofgem's oversight helping to prevent consumer detriment where supplier action to swiftly restore communications (including by replacing the communications hub and relevant other metering devices) can be reasonably expected, as well as making sure consumers are compensated (under the GSOP framework) where this does not happen.

We acknowledge that Ofgem's 90-day GSOP proposal allows an additional 30 days for suppliers to address smart meters operating in traditional mode for WAN issues related to the DCC. We also consider that the All Reasonable Steps requirement in the Licence Conditions

already provides flexibility to account for circumstances beyond the supplier's control that could lead to more time being needed.

We have therefore decided to proceed with 90 calendar days as the timeframe for resolution set out in Licence Conditions. This is consistent with the proposal as consulted on and aligns with other sections of the Licences and the SEC. We will evaluate whether any adjustments to the timeframe are required when Ofgem finalise plans for the 90-day GSOP.

We and Ofgem expect energy suppliers to take action in 2026 to ensure they meet their licence obligations, including by significantly increasing the numbers of smart meters operating in smart mode and ensuring that they resolve smart meters operating in traditional mode as quickly as possible and within 90 days.

Operational impacts

To test the feasibility of the resourcing requirements of the Post 2025 Framework, we modelled an illustrative scenario for what suppliers might do at a market-wide level in 2026 to 2033 (see 'Sensitivity testing for resource requirements' in the Analytical Annex and Section 4.3 of the Impact Assessment).[26] This found that a modest increase in installation capacity is likely to be required, requiring either investment to increase the market-wide workforce or augmenting with additional capacity via installers with different skills. We consider that this policy package provides regulatory certainty over a long timeframe to enable energy suppliers to confidently make the required investment to increase the overall workforce over the next few years. Suppliers are expected to take all reasonable steps to address any capacity challenges, ensuring efficient recruitment, training, and workforce management to minimise potential disruption within the industry.

On the concerns that suppliers may replace smart meters not operating in smart mode unnecessarily and on concerns about premature replacement charges, we note that we would expect suppliers to work with the DCC to triage and identify how to rectify the root cause of the smart meter falling into traditional mode. This should maximise efficiencies and should act to minimise the number of any smart meters being prematurely replaced unnecessarily, which should also address concerns about premature replacement charges where the meter has not been found to be at fault.

We recognise that there is regular cross-industry consideration of the causes of smart meters falling into traditional mode. We welcome the information sharing and focus on common issues resolution we have seen in smart meter governance forums. This remains an important means of focusing collectively on consumer benefits being realised and efficient resolution of issues.

Non-domestic sector

More details on the inclusion of the non-domestic sector in this proposal, and any nuances raised by stakeholders with respect to these aspects, are addressed in Question 8.

[26] Smart Metering Policy Framework – Post 2025: Annex A: Analytical Evidence

Question 6

Summary of responses to Question 6

Do you agree that we should amend the Operational Licence Condition to require suppliers pre-emptively replace communication hubs (and any associated smart metering equipment) by prescribed dates, supported by a new obligation on DCC under their Licence to issue a statement of dates setting out when DCC will no longer be able to provide specific communication services, so it is clear by when suppliers need to have completed replacements in order to avoid any impact on consumers? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

	Agree	Agree with Caveats	Neutral	Disagree with Caveats	Disagree	No Response
Respondents	20	23	0	1	6	14

Of a total of 64 respondents, 50 provided an answer to this question. Most of those (86%, 43 of 50) agreed, or agreed with caveats, with the proposal to amend the Operational Licence Condition to require suppliers to pre-emptively replace communication hubs and any associated smart metering equipment by prescribed dates, supported by a new obligation on the DCC to issue a statement of dates setting out when specific communication services will end. A small number (14%, 7 of 50) of respondents disagreed, or disagreed with caveats, to the proposal. There were no neutral responses.

Respondents who were supportive of the proposal generally agreed that it would ensure sustainment of consumer benefits from smart meters and that the requirement for the DCC licence to provide clear timelines would assist with operational planning for pre-emptive replacement.

Of the respondents who were not supportive of the proposal, a few asserted that amending the Operational Licence Condition was unnecessary, noting that the existing Operational Licence Condition already requires pre-emptive replacement. One of these respondents stated that energy suppliers already have strong commercial reasons to maintain and manage their smart meter estates, and that only the amendment of the DCC licence was required to assist them with the additional information needed for investment and operational planning of pre-emptive replacement.

Sufficient notice and planning

A few energy suppliers suggested that they should be consulted on the notice period for the inclusion of service end-dates in the DCC's communication statement. Some argued that although the proposed DCC licence drafting suggests that the DCC is required to publish a statement as soon as reasonably practicable, this does not necessarily ensure adequate notice is given to allow suppliers time for effective planning and certainty for required investment. One

respondent highlighted the importance of coordinated planning across the department, the DCC and industry to support any prescribed dates and ensure sufficient flexibility that reflects dependencies outside of suppliers' direct control.

Some respondents noted that the DCC licence should explicitly require sufficient notice when service changes are imminent, with one suggesting a requirement to review and re-notify suppliers every six months, even when there have been no changes. Another respondent stated that the timeframe for such notice should be proportionate and consider the historic smart meter installation rate.

Noting that the drafting allows for the DCC to update the statement and therefore require suppliers to update their deployment plans, some respondents called for assurance that suppliers would not be held accountable if they were unable to reach milestones due to shifts in demands, also highlighting the impact on costs and resources associated with doing so.

One respondent proposed expanding licence obligations to give the DCC a formal role in the deployment plan process, reviewing suppliers' deployment plans ahead of final Ofgem sign-off. This was on the basis that this would provide insights that could allow more effective DCC service planning, delivering better value to the consumer.

One respondent recommended amending the proposed DCC licence conditions so that communication service end-dates which may be subject to negotiation, are not included in the communication availability statement.

Operational impacts and costs

Some suppliers raised concerns around the potential difficulties in meeting the replacement obligation due to limited installer resources. One respondent noted that sharing limited resources across new installations, meter maintenance and meter replacement may reduce capacity. Similarly, another highlighted potential capacity challenges in meeting all activities across sectors post-2025.

A few respondents argued that pre-emptive replacement is costly and may lead to premature asset disposal, suggesting that flexibility around costs and other complexities in the proposed All Reasonable Steps approach would reduce this risk.

The risk of increased costs to consumers was of concern to a few respondents, with one noting that the obligation could impose significant costs on suppliers and would therefore require careful management to prevent impacting consumers' bills.

One respondent suggested that the department considers moderating churn rental agreements to avoid cost increases that could lead to higher bills for consumers, noting that whilst suppliers negotiate rental agreements with their MAP originator for meters they install, they then face growing costs as portfolios churn.

A few respondents expressed concern that the obligation may lead to premature asset disposal and highlighted the potential environmental and cost impacts of early removal,

suggesting that the new framework should not encourage premature asset replacement to meet regulations. However, another suggested that the proposed All Reasonable Steps approach would reduce this risk if flexibility around costs and other complexities was factored in.

Non-domestic sector

More details on the inclusion of the non-domestic sector in this proposal, and any nuances raised by stakeholders with respect to these aspects, are addressed in Question 8.

Government response to Question 6

Sufficient notice and planning

We have considered both the proposals to ensure the DCC provides suppliers with adequate notice of pre-emptive replacement requirements, and the proposal that communication service end-dates which may be subject to negotiation are not included in the DCC's Communication Availability Statement.

Ensuring the continuity of services for smart meter consumers is a top priority. There are therefore advantages that arise from ensuring that the DCC alerts suppliers of the relevant service end-dates to work towards as soon as possible. There are also advantages to ensuring that dates are not provided whilst there is potential for material change, as this could result in significant additional costs and inefficiencies for industry.

We therefore propose the following changes to the proposed DCC licence amendments in order to balance the need to provide early certainty with the fact that some dates may be subject to change.

- We will require the DCC to set out in its statement the following:

1. The cohorts of SMETS1 and 2G/3G smart metering systems where the DCC is providing communication services.
2. For each cohort, the end date from which the DCC will no longer be able to provide communication services for that cohort.
3. For cohorts where the DCC is seeking to extend the end-date, the date that the DCC publishes in the Statement for that cohort will be the date that, based on the 'Joint statement on the sunsetting of 2G and 3G networks and public ambition for Open RAN rollout as part of the Telecoms Supply Chain Diversification Strategy'[27], will be the last date on which Mobile Network operators will offer 2G/3G networks. That is set out in the statement as the end of 2033.

[27] A joint statement on the sunsetting of 2G and 3G networks and public ambition for Open RAN rollout as part of the Telecoms Supply Chain Diversification Strategy - GOV.UK

- We have strengthened the obligation on the DCC to keep the statement updated, by requiring updates to be made 'as soon as reasonably practicable' once any changes to service end-dates are confirmed.

Suppliers will be required, in any event, to take All Reasonable Steps to undertake the pre-emptive replacements required in order to ensure service continuity beyond the communication service end-dates in the DCC statement.

Regarding requests that the DCC consults with energy suppliers or other industry stakeholders on Communications Availability Statement, we expect DCC to continue to engage with industry on key decisions taken with respect to communications services contracts and their end dates at appropriate times and via the usual channels and as such, the Statement should effectively formalise these decisions and therefore not require additional consultation with suppliers in advance.

We do not consider it necessary to extend DCC's licence obligations to include a formal role in the deployment plan process, as it will have visibility of milestones and progress via suppliers' websites, as set out in our response to Q16 Part C(b), which can be used to inform its service planning. Furthermore, the introduction of this additional activity could lengthen the process and/or result in delay to the implementation of deployment plans. We note the importance of securing value for money for consumers and that it is within suppliers' gift to deliver faster than contract end-dates allow. We recognise that there are means of bringing services to an end sooner, should industry collectively consider this to be achievable and cost-effective, and we would encourage this to be assessed alongside progression against all other objectives to maximise benefits to the consumer. It is our expectation that this will be closely tracked by Smart DCC and industry.

Whilst no concerns were raised by consultation respondents around the clarity of the proposed drafting for the pre-emptive replacement Operational Licence Condition, we have further reviewed the provision and consider that clarification is required to ensure the obligation is aligned with the policy intent outlined in the consultation - specifically that replacements must occur pre-emptively. SMETS1, SMETS2 and 2G/3G communications hubs, regardless of their operational status, will be subject to this pre-emptive replacement requirement.

Operational impacts and costs

To test the feasibility of the resourcing requirements of the Post 2025 Framework, we modelled an illustrative scenario for what might be undertaken at a market-wide level in 2026 to 2033 (see 'Sensitivity testing for resource requirements' in the Analytical Annex[28] and Section 4.3 of the Impact Assessment). This found that a modest increase in installation capacity is likely to be required, requiring either investment to increase the market-wide workforce or augmenting with additional capacity via installers with different skills. We consider this policy package provides regulatory certainty over a long timeframe to enable energy suppliers to confidently make the required investment to increase the overall workforce over the next few years.

[28] Smart Metering Policy Framework – Post 2025: Annex A: Analytical Evidence

Suppliers are expected to take all reasonable steps to address any capacity challenges, ensuring efficient recruitment, training, and workforce management to minimise potential disruption within the industry.

The impact on installer capacity for non-domestic suppliers is set out within the response to Question 8.

We recognise the importance of keeping meters in service for as long as possible. This is a logical approach that aligns with the objective of minimising unnecessary meter replacements and early replacement costs. We therefore expect suppliers to plan their replacements in a way that seeks to minimise unnecessary early removals and costs, whilst ensuring that they are on track to meet their obligations. This approach not only supports financial efficiency but also helps to minimise disruption to consumers and to reduce environmental impact by ensuring assets are used for their full operational life wherever possible.

We note the DCC has extended its contracts with key service providers to enable SMETS1 service provision for the majority of SMETS1 assets to 2033. This will allow energy suppliers to maximise the asset life of installed equipment and optimise their SMETS1 replacement work profile to reduce Premature Replacement Charges (PRCs), thus helping to address both workforce challenges and concerns about the costs of pre-emptive replacements.

In addition, the Post 2025 Framework is clear that, to ensure service continuity of SMETS2 meters, only the communications hub needs to be replaced, rather than the entire SMS. To support this, the department has worked closely with the DCC and Ofgem to develop a communications hub-only exchange funding process, specifically covering funding of the cost of replacing the communications hub. This means that suppliers do not have to resort to full SMS (including meter) replacement solely for funding purposes as part of a MAP-funded meter exchange. Suppliers may of course choose to replace the SMETS2 SMS where it is considered efficient and effective to do so, such as where the SMETS2 SMS has come or is coming to the end of its asset life and where it would make sense to replace the SMS rather than undertake two site visits in quick succession.

The Post 2025 Framework provides suppliers with the flexibility in determining the optimal path to achieving each of their obligations by the relevant deadlines. This includes the flexibility, for example, to take into account asset life, the costs of replacements over time and other considerations when determining how they will meet their regulatory requirements.

Question 7

Summary of responses to Question 7

Do you agree with proposals to clarify that the existing smart metering Operational Licence Condition (SLC 49 electricity and SLC 33 gas) applies to all SMETS meters in

designated premises moving forward? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

	Agree	Agree with Caveats	Neutral	Disagree with Caveats	Disagree	No Response
Respondents	21	4	7	1	6	25

Of a total of 64 respondents, 39 provided an answer to this question. The majority of these (64%, 25 of 39) agreed, or agreed with caveats, with the proposal to clarify that the existing smart metering Operational Licence Condition applies to all SMETS meters in designated premises. A small number (18%, 7 of 39) disagreed or disagreed with caveats. The remaining 7 responses were neutral.

Overall, while most respondents welcomed the proposal for its clarity and consistency, a minority highlighted the need for regulatory flexibility and alignment with other ongoing regulatory developments.

Respondents who supported the clarification expressed that they would value the consistency and clarity it would bring to non-domestic smart meter obligations, particularly highlighting the importance of ensuring smart meters remain operational for non-domestic benefits realisation, including data access, energy/network management, and improved consumer outcomes. A few stakeholders confirmed that they already apply the same fault resolution processes to all consumers with SMETS meters. Support for this proposal came from a range of stakeholder types, including consumer groups, energy suppliers, and metering companies.

Respondents who disagreed with the clarification, or expressed caution, particularly noted that non-microbusiness metering arrangements can be more complex (e.g., larger portfolios, third-party involvement, rural or high-security sites), which may complicate the resolution of meters not operating in smart mode. A few respondents raised concerns about potential regulatory complexity for a small number of meters, especially for suppliers whose portfolios are mainly non-microbusiness customers. A few respondents called for flexibility through an All Reasonable Steps approach. Several responses also flagged potential misalignment with Ofgem's recent statutory consultation on smart metering GSOPs which signalled an intention for the scope of these to be limited to microbusiness energy consumers.

Government response to Question 7

The government has decided to proceed with the clarification that, moving forward, the existing Operational Licence Condition (SLC 49 and SLC 33 gas) applies to all designated premises with SMETS meters. We agree with points raised by stakeholders regarding the importance of ensuring smart meter connectivity for all non-domestic organisations in scope of the smart meter rollout, particularly given the potential for high energy savings in the non-domestic sector and the negative impacts of meters operating in traditional mode on consumers (e.g.,

estimated billing, reduced trust, and missed opportunities for energy efficiency and flexibility services).

Whilst we acknowledge there may be additional operational complexities associated with resolving smart meters in traditional mode for larger portfolios or more sensitive sites, we do not consider this a strong reason for them to remain excluded from the obligation on suppliers to resolve issues with smart functionality. In particular, the technical solutions for resolving smart meters in traditional mode remain standard across microbusinesses and non-microbusinesses. Non-microbusinesses with SMETS meters make up around 0.3% of smart meters operating nationally. In addition, the existing Operational Licence Condition is already an All Reasonable Steps provision, providing regulatory flexibility where there may be more nuanced complexities, such as site location or sensitivity (which is explored further in Question 8).

We also do not agree that Ofgem's decision to limit the smart metering GSOPs to microbusinesses necessitates that we take the same approach with respect to the Operational Licence Condition, as these policies meet different objectives. In particular, Ofgem's GSOP consultation assessed the suitability of compensation payments in the non-domestic sector for consumer detriment caused by poor smart meter customer service (and in that context, has decided to limit the scope of these payments to microbusiness consumers in the first instance, with Ofgem's recent review of GSOPs inviting views on the applicability of GSOPs to broader non-domestic consumers).[29]

This policy framework is concerned with the appropriate licence conditions post-2025 on energy suppliers regarding smart meter connectivity, including how this aligns with other energy supplier obligations. In particular, since October 2024 energy suppliers have been obligated to provide all designated premises with smart meters with free and regular information on their energy use, based on smart meter data.[30] Given the importance of smart meter functionality to deliver the benefits of the non-domestic consumer data offer, it is therefore reasonable that energy suppliers of these organisations are subject to the same obligations as microbusinesses with respect to SMETS functionality, and that the policy framework at the small-medium end of the market is clarified to ensure consistency for consumers. In addition, the prevalence of small suppliers in the non-domestic market makes it even more important that the Operational Licence Condition applies across industry, to ensure a consistent customer experience irrespective of their choice of supplier.

[29] Reviewing the Supplier Guaranteed Standards of Performance (GSOP)
[30] Maximising non-domestic smart meter consumer benefits, improving the data offer and enabling innovation - GOV.UK

Question 8

Summary of responses to Question 8

Do you have views on any nuances specific to the non-domestic sector which interact with the proposals to introduce an obligation on energy suppliers to take all reasonable steps to recover smart meters operating in traditional mode within 90 days, and to amend the Operational Licence Condition, supported by a new obligation on DCC under their Licence to issue dates, so it is clear by when suppliers need to pre-emptively replace smart metering systems before relevant communication services terminate? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

Of a total of 64 respondents, a minority of 25 (39%) provided views on this question.

Proposals to introduce an obligation on energy suppliers to take all reasonable steps to recover smart meters operating in traditional mode within 90 days

Some respondents supported the inclusion of non-domestic smart meters within scope of the 90-day obligation for similar reasons to those set out in Question 7. Support came from a broad range of sectors including consumer groups and some energy suppliers.

Some respondents, particularly non-domestic energy suppliers, queried the suitability of the 90-day period for resolving smart meters in traditional mode in the non-domestic sector, citing sector-specific challenges which could make the timelines challenging. Those included longer timelines needed to manage access to remote or high-security sites, remedial works and sourcing sufficient installer capacity. A small number of respondents suggested challenges could be magnified for gas meters, and a small number also suggested an alternative timeframe of 120 days for the non-domestic sector rather than the proposed 90-day obligation.

Some non-domestic stakeholders queried the alignment between the 90-day obligation and Ofgem's proposals with respect to smart metering GSOP (including for microbusiness SMETS meters).

One organisation suggested that non-domestic consumers can have bespoke contract arrangements which will already entail service expectations on suppliers (i.e. to maintain a smart service) and therefore queried the role of regulation in this area.

Proposals regarding pre-emptive meter replacement

Most respondents did not comment on the non-domestic nuances associated with pre-emptive meter replacement. Those that expressed agreement with non-domestic inclusion highlighted the shared value of the regulations for creating a level playing field, and that having clarity on service end-dates within the sector will enable proactive planning for replacements and help maintain consumer confidence. One energy supplier sought clarity on how the obligation to

replace SMETS meters by relevant end-dates would apply in the non-domestic context, given that non-domestic meters are not in scope of deployment plans.

The majority of non-domestic suppliers highlighted potential challenges associated with communications hub replacements in the non-domestic sector, including risks around engaging non-domestic consumers with the process (e.g., site access or perceived business disruption). A few non-domestic stakeholders raised concerns that pre-emptive replacement could lead to double rental payments, or that pre-emptive replacement costs could be magnified by churn.

Government response to Question 8

The government is proceeding with both obligations with respect to non-domestic SMETS meters (in addition to domestic).

In addition to aligning with the DCC's 90-day SLA, industry insight historically suggests that three months or fewer is a common timeline used for booking appointments in the non-domestic sector. The government has also now published a consultation on driving non-domestic smart meter uptake in support of the Clean Power Mission and protecting non-domestic consumers in the transition to smart-contingent contracts.[31] The 90-day resolution timeframe for non-operating meters broadly aligns with the government's proposals under the binding consumer protection code of practice with respect to smart-contingent contracts (whereby, for customers with three or fewer sites, suppliers would be required to take all reasonable steps to arrange a smart meter installation appointment within three months of inception of the fixed term contract).

Whilst there may be nuances associated with resolving non-operating meters that are more prevalent in the non-domestic sector, the obligation on suppliers is to take all reasonable steps to resolve these within 90 days. This means that in making the relevant enforcement decisions, Ofgem would reasonably consider sector-specific circumstances. We would also encourage suppliers to record and communicate to the regulator cases where resolution depends on the actions of another party (e.g., in resolving technical constraints) or the customer themselves (e.g., where a business has not enabled access to the premises or security factors have prevented this). In addition, given that suppliers are already required to take all reasonable steps to maintain SMETS connectivity under the existing Operational Licence Condition (SLC 49 electricity and SLC 33 gas), operational solutions for addressing sector-specific challenges should already be well developed by industry at this stage in the rollout.

We also do not consider that those stakeholders who proposed extending the resolution timeline to 120 days in the non-domestic sector (e.g., an additional 30 days) provided evidence in their responses as to why this would resolve the sector-specific nuances raised. Therefore, the regulatory flexibility offered under the 90-day All Reasonable Steps provision is preferable compared to extending the resolution timeline.

[31] Non-domestic smart meter rollout post-2025 - GOV.UK

Regarding installer capacity, the government's consultation on non-domestic smart-contingent contracts sets out why we propose there is flexibility for suppliers to balance new installations resulting from the smart-contingent proposals alongside the non-domestic 4G transition and amendments to the Operational Licence Condition, and it has invited stakeholder views on this point. Matters relating to overall installer capacity in the non-domestic sector to balance different priorities will therefore be addressed in our response to that consultation.

Broader questions on the alignment between GSOP and the 90-day obligation are addressed in our response to Question 5.

Finally, the purpose of establishing the 90-day timeframe for resolution is to standardise obligations on energy suppliers and drive a more consistent experience for consumers irrespective of their choice of energy supplier. Many non-domestic consumers in scope of the smart meter rollout will be smaller businesses without energy managers or bespoke contract arrangements who may not have the capacity to resolve technical issues with their meter independently and need additional support. Even if some suppliers do offer contractual provisions addressing non-operating meters, these will vary significantly across the market and do not guarantee a consistent or timely recovery of smart services for all smaller non-domestic consumers.

Regarding the pre-emptive obligation, the government agrees that there may be nuances associated with the non-domestic 4G transition, though these have been accounted for in the policy framework. In particular, non-domestic activity is not included within scope of deployment plans because binding metrics with respect to SMETS meter replacements or communications hub-only exchanges are not currently appropriate for the non-domestic market context at this stage, given the possible shorter-term focus on advanced meter upgrades.

It therefore remains reasonable that suppliers be required to take all reasonable steps to replace SMETS meters and communications hubs ahead of the relevant longer-term end dates in the non-domestic sector. There are also positive reasons to consider that non-domestic customer engagement challenges may be lessened in instances of communications hub-only exchanges, given that a primary non-domestic constraint to regular meter replacements (powering down the electricity) is not required. This is also the case in more technical situations, such as when the hub is attached to a meter, or on a flying lead or hot shoe. To date, industry insight suggests that initial testing of exchanges has gone well in the non-domestic sector. Therefore, the flexibility offered by the new framework gives non-domestic suppliers ample time to learn from similar examples (e.g., Radio Teleswitch Service, advanced meter 4G transition) to develop engagement strategies tailored to non-domestic SMETS customers.

Finally, it is not the case that pre-emptive replacements will lead to double meter rental payments; suppliers would only need to pay rental on the new asset. With respect to the impact of churn in the non-domestic market on pre-emptive replacement costs, churn is a naturally occurring market event; as with any aspect of non-domestic customer service, the sunsetting of particular technologies or necessary upgrades means that suppliers that choose

to grow their business also accept responsibility for maintenance of new customers' metering arrangements.

Section Two – Conclusion

DECISION 2: To proceed with the consulted obligation for energy suppliers to take all reasonable steps to recover smart meters operating in traditional mode within 90 days, with respect to both domestic and non-domestic ("designated") premises.

DECISION 3: To proceed with the consulted amendment to clarify the obligation for energy suppliers to take all reasonable steps to pre-emptively replace communications hubs, and any relevant associated smart metering equipment ahead of dates specified by the DCC, with respect to both domestic and non-domestic ("designated") premises. In support of these OLC amendments, to proceed with a new obligation on the DCC within the DCC Licence to issue a 'Statement of Availability of Communication Services'.

DECISION 4: To proceed with the clarification that all designated premises with SMETS meters are in scope of the existing Operational Licence Condition.

Section Three: 2030 domestic rollout obligation

Question 9

Summary of responses to Question 9

Do you agree with the proposed All Reasonable Steps obligation for energy suppliers to complete the domestic rollout by 2030 set out in Section 2. We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

	Agree	Agree with Caveats	Neutral	Disagree with Caveats	Disagree	No Response
Respondents	21	21	5	2	5	10

Of a total of 64 respondents, 54 provided an answer to this question. The majority of those (78%, 42 of 54) agreed, or agreed with caveats, with the proposed obligation for energy suppliers to take all reasonable steps complete the domestic smart meter rollout by the end of 2030 as set out in Section 2 of the consultation document. A small number (13%, 7 of 54) disagreed or disagreed with caveats. The remaining five responses were neutral.

Respondents generally welcomed the certainty the Framework would provide to stakeholders and the flexibility of the All Reasonable Steps approach. Other points raised reflected a range of views, with no key themes being raised by the majority of respondents. Many called for clearer enforcement, equity safeguards, or measures to address disengaged consumers.

Clarification of 'All Reasonable Steps'

Despite many welcoming the proposed All Reasonable Steps obligation to complete the domestic rollout by the end of 2030, a number of respondents raised concerns about a lack of clarity in its practical application, in terms of expectations of suppliers. Whilst the areas of uncertainty raised varied by respondent, they tended to focus on how enforcement would be handled in regard to consumer refusal and areas considered outside the energy suppliers' control, such as DCC connectivity issues. A number of respondents raised concerns that the nature of the obligation left too much uncertainty to allow suppliers to underperform (compared to the 2022-2025 Targets Framework), and some expressed a wish to ensure strong enforcement against the framework to maximise the benefits provided by the smart metering rollout.

Challenges to completing the rollout

Some responses highlighted various challenges to completing the rollout by the end of 2030, with small numbers of respondents citing challenges around consumer acceptance, installer workforce, and technical challenges.

Some respondents stated that they believe it will not be possible to achieve 100% smart meter penetration, often requesting that a number <100% was made explicit, either directly in the Licence Conditions or in correspondence from Ofgem. A number of alternative options were suggested for this percentage, ranging between 78% and 94%, as well as some respondents having not made reference to percentages.

Conversely, one respondent raised a concern that 85% penetration would minimise the benefits seen by the smart metering rollout and therefore suggested defining minimum success criteria as part of All Reasonable Steps.

A small number of respondents raised challenges around persuading consumers to accept smart meters. Respondents noted that many consumers were apathetic, highlighting the volume of contact attempts ignored by consumers, or the number of consumers who had opted out of communications relating to smart metering. A few energy suppliers pointed to incentive schemes (either direct cash payments, or better energy pricing) which in their view had made limited impact on smart meter uptake.

A small number of respondents noted that an increase in the smart metering workforce would be necessary to meet the targets, and certain rollout penetrations by the end of 2030. Without these increases, some respondents suggested that certain types of projects would be deprioritised. Additionally, one respondent noted that older installers could soon exit the workforce, highlighting a need for appropriate knowledge transfer mechanisms to ensure that knowledge was not lost.

A small number of respondents highlighted persistent issues relating to Wide Area Network (WAN) connectivity, the Data Communication Company's (DCC) enrolment of meters, and geographical connectivity challenges in parts of Great Britain. Respondents noted the need for continued innovation in this space, as it may be more difficult to install and commission smart meters in some of the remaining properties without smart meters.

A small number of respondents suggested that the All Reasonable Steps obligation should apply only to electricity smart meters, citing reduced benefit and the risk of stranded assets due to Clean Power 2030 and the Net Zero 2050 targets requiring electrification of the energy system. Some of those noted that a gas smart meter installed in the 2030s with a 15-year life span could have an operational end-of-life in 2048. One also noted that, in their experience, consumers who have split gas and electricity suppliers are generally less engaged with their gas supplier or the smart meter rollout.

Concerns were raised by a small number of respondents relating to the cost of the proposed policy, citing increases in costs of smart meter installations in recent years. Some requested

changes to the price cap, including ensuring that the price cap also considers operational expenditure of installations.

One respondent mentioned the need to account for customer churn.

Policy interventions

A small number of respondents suggested additional policy interventions to support the smart meter rollout between 2026 and 2030. Although out of scope of this consultation, we have reviewed these proposals carefully. There is a range of evidence which supports ensuring the vast majority of consumers can have a smart meter by the end of 2030, and we have provided an updated list below of additional measures being explored, or recently actioned, to further support the smart meter rollout.

Consumer equity and protections

Ensuring vulnerable consumers are not de-prioritised under the new framework.

On this question, a number of respondents highlighted the importance of an equitable rollout. A small number of respondents highlighted the need to ensure equity for rural communities (with a focus on the Highlands and Islands of Scotland), which currently have lower smart meter penetration. One respondent considered that the new Framework would allow more equitable work to occur in these areas, due to the greater flexibility afforded by an All Reasonable Steps approach than by government-set targets.

A small number of respondents commented that any framework should ensure that appropriate engagement and consideration is given to vulnerable consumers or other consumer segments, with some arguing for sub-targets for particular segments. Consumer segments raised including those in social housing, the Private Rented Sector, on prepayment meters, and disabled consumers.

A small number of respondents raised health and safety concerns, relating to alleged cases of electro-sensitivity. However, it is worth noting that extensive research conducted by Public Health England to assess exposure from smart meters found there is no evidence that radio waves produced by smart meters pose a health risk.[32]

Regional approach

A small number of respondents suggested moving the smart meter rollout to a street-by-street model, possibly delivered by third parties, with one respondent noting that this approach may be too

[32] The predecessor organisation to the UK Health Security Agency, Public Health England (PHE), carried out an extensive programme of research to assess exposure from smart meters. The results of this comprehensive work are now published in three parts in the peer-reviewed journal Bioelectromagnetics, which can be found online here: Part 1, Part 2 and Part 3. The results of this research confirmed PHE's advice that exposure to radio waves from smart meters is well below the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines.

late for new installations but appropriate for 4G communications hub upgrades. One respondent also suggested revisiting the previous pilot which took place in Derby.

Question 10

Summary of responses to Question 10

> *What are your views on the benefits and risks of the approaches, outlined under 'Alternative approaches considered'? Please provide evidence and rationale to support your answer.*

Of a total of 64 respondents, a majority (58%, 37 out of 64) provided answers to this question.

The responses reflect a range of views, with no key themes being raised by the majority of respondents. Some highlighted All Reasonable Steps as a flexible delivery model compared to government-set targets, while others raised concerns about enforceability, timescales, and consumer equity. Further details on these positions, the reasons for support or opposition, and the caveats raised, are set out below.

All Reasonable Steps 2030

A minority of respondents supported the proposal for suppliers to take all reasonable steps to complete the domestic smart meter rollout by the end of 2030. The majority of these respondents emphasised that the proposed framework provides a flexible delivery model, in contrast to the perceived rigidity of annual government-set installation targets. This flexibility was seen as essential for allowing suppliers to adapt to operational realities, including installer availability, regional deployment challenges, and evolving technical requirements, while maintaining momentum. A small number noted that the proposed framework supports continuous rollout activity, which is critical for realising system benefits (such as electricity network flexibility and data-driven services) without creating compliance risks from unrealistic quotas.

Support for the framework was often conditional, with a small number of respondents highlighting caveats or the need for additional measures to ensure its effectiveness. Similar to the responses to Question 9, common caveats included the need for clear enforcement and compliance provisions to ensure that "all reasonable steps" is well defined and consistently monitored. A small number called for explicit treatment of smart meters operating in traditional mode (i.e. installed but not communicating). A small number also raised concerns around timescales, workforce capacity, installer availability, and complexity of asset replacement (e.g. 2G/3G sunset, SMETS1 upgrades). Some respondents called for government intervention to support consumer demand to complement the All Reasonable Steps proposal, noting risks of market inequalities and disengaged customers. Finally, equity safeguards were highlighted, with a

small number stressing the importance of ensuring that vulnerable and hard-to-reach consumers are not left behind.

Targets framework

A small number of respondents supported the reintroduction of a binding annual installation targets framework, similar to the 2022–2025 Targets Framework, arguing that the New and Replacement Obligation (NRO) and consumer opt-in alone would not be sufficient to deliver the ambition of the framework. A small number of respondents also argued that, without further regulation there may be uncertainty for the supply chain, less incentive for workforce and installer growth and the proactive replacement of legacy assets.

Conversely, a small number of respondents opposed the reintroduction of a targets framework, arguing that such targets could be unrealistic or overly prescriptive, especially considering the varied starting points across suppliers and consumer segments. These respondents warned that repeated failure to meet targets could undermine consumer and stakeholder confidence, and that such targets may not adequately account for differences in customer demographics, geographical conditions, or installer capacity. Some also raised concerns that strong enforcement of targets could increase costs to consumers or lead to dissatisfaction if the rollout is perceived as aggressive or poorly managed.

No new regulation / New and Replacement Obligation (NRO) only

A small number of respondents favoured maintaining the current regulatory architecture without further new obligations beyond the NRO, suggesting that suppliers already have strong incentives to install smart meters, such as reputational benefits, system efficiencies and competitive pressures. A small number also noted that smart meter penetration is already high and that adding more regulation may risk market disruption or consumer backlash, and some argued that existing mechanisms (merit-based incentives, consumer demand) are sufficient and additional regulatory burden may not be proportionate.

However, a small number opposed the idea of relying solely on the NRO and consumer opt-in and, similar to criticisms of not having a binding targets framework, expressed concern that vulnerable and hard-to-reach consumers could be left behind if rollout is driven solely by consumer choice.

Other suggestions raised

A small number of respondents proposed alternative or complementary measures. A few suggested adopting a consumer choice-based approach, allowing a demand-led rollout whereby consumers opt in. Others suggested interventions similar to those raised in response to Question 9, such as opt-out charges or mandating smart meters in certain situations, such as at end-of-life replacements. One respondent suggested excluding flats from the rollout, holding the view that they will only make a limited contribution to Clean Power 2030.

Government response to Questions 9 and 10

Proposed framework

We confirm that we are proceeding with the proposal to require suppliers to take all reasonable steps to complete the domestic rollout by the end of 2030.

Ensuring that all domestic consumers can benefit from smart meters as soon as possible is key for ensuring an equitable rollout and underpins a modern, clean and flexible energy system.

As set out in the consultation, we consider that proceeding with an NRO-only obligation would not deliver fast enough progress to enable the Clean Power 2030 Mission or maximise the benefits provided by smart meters to households across Great Britain.

As regards calls for a continued government-set targets framework, we recognise that, in the period beyond 2025, there is a wider range of smart metering related activities energy suppliers need to deliver, which will impact suppliers differently according to their varying metering and customer portfolios. We also recognise that, although we consider there is sufficient consumer demand for energy suppliers to make significant progress, the remaining pool of consumers yet to take up a smart meter will increasingly be made up of consumers who may be less engaged and harder-to-reach as the rollout progresses.

At this stage, we are therefore proposing a regulatory framework that provides energy suppliers with a degree of flexibility to optimise their delivery programmes whilst meeting regulatory requirements. We will, however, continue to review progress by energy suppliers and are prepared to bring in less flexible measures if we consider that insufficient progress is being made towards completion of the rollout by the end of 2030 and improved smart meter operations.

While we acknowledge the calls by some respondents for definition of what constitutes ‘all reasonable steps’, we do not consider it appropriate for government to further define the obligation. The use of ‘all reasonable steps’ is well established in Licence Conditions and ensures that interpretation is guided by regulatory best practice rather than prescriptive wording. It allows for greater flexibility and adaptability to account for future improvements in technology, installation capacity and consumer demand, such as due to the greater availability and attractiveness of smart-enabled products and services, such as electric vehicle charging, than more prescriptive regulation. When considering any enforcement decisions, Ofgem will take account of the criteria as set out in their Enforcement Guidelines.[33]

While we expect suppliers to consider local approaches where appropriate, including coordinated local engagement such as that supported by Smart Energy GB (SEGB), we are not going to require that a street-by-street approach is deployed. Although geographic approaches can provide operational efficiencies and are already used by many suppliers,

[33] The Enforcement Guidelines | Ofgem

making it a regulatory requirement risks limiting suppliers' ability to tailor the rollout of smart meters to their portfolio, consumer engagement strategies and regional constraints.

Challenges to completing the rollout

Whilst we recognise some of the challenges raised by respondents in relation to completing the rollout by the end of 2030, there is a range of evidence and measures that support ensuring that the vast majority of consumers can have a smart meter by the end of 2030.

- Current rates of progress being reported by energy suppliers show that customer conversion (the proportion of traditionally metered customers going on to get a smart meter) has increased slightly in 2025 to date.[34]
- Local authority level rollout progress statistics show high levels of smart meter penetration are possible, with the proportion of domestic electricity meters that are smart meters at or close to 80% in six areas (as of Q1 2025), with a steady rate of progress still being achieved in areas with the highest coverage.[35] This provides confidence that high levels of coverage are possible across Great Britain.
- Consumer attitudes data shows that the majority of non-owners are open to getting a smart meter: 48% are neutral or positive about getting one in the next 6 months, and an additional 23% indicate that they could be open to a smart meter at some point but wouldn't want one installed in the next 6 months. Only a minority (18%) currently indicate that they don't intend to ever get a smart meter, when scaled to the whole population this group represents only 6% of all Great Britain's households.[36] In addition, negative attitudes are not fixed - we are aware that even those who say they would reject smart meters can change their minds. Of a sample of people who said that they would reject a smart meter in the next 6 months, 14% reported they then got, or tried to get, one in that time period.[37] We expect attitudes to further improve as suppliers drive down the proportion of smart meters not operating in smart mode, and improve overall consumer experience (and associated positive word of mouth) as a result.
- As we move towards Clean Power 2030, we expect demand for smart meters to be sustained and potentially to increase through the increasing use of low carbon technology (such as electric vehicles, solar PV or heat pumps), where smart meters often provide significant co-benefits through tailored tariffs, and we would encourage suppliers to make full use of these opportunities by deploying smart-contingent tariffs and related incentives. Flexibility is a potential motivator with around half (48%) of

[34] Smart meters in Great Britain, quarterly update September 2025 - GOV.UK
[35] Smart meters in Great Britain, quarterly update March 2025 - GOV.UK
[36] Smart Energy GB, May 2025, unpublished. A survey of 7854 GB adults, fieldwork was conducted online and via CATI in May 2025. Weighted to be nationally representative.
[37] Smart Energy GB surveyed 1,184 UK adults who 6 months prior stated they do not have a smart meter, of whom 726 said they would reject one if offered in the next 6 months. Fieldwork was conducted online and via CATI in May 2025. Data was weighted to be representative of the seek/accept/reject profile in their prior survey.

consumers without a smart meter saying that they think they could benefit from using energy flexibly.[38]

- As regards to workforce, we agree that a modest increase in installation capacity is likely to be required, as set out in the Analytical Annex[39] and Section 4.3 of the Impact Assessment. This could require, for example, investment to increase the market-wide workforce or augmenting with additional capacity via installers with different skills. We consider this policy package provides regulatory certainty over a long timeframe to enable energy suppliers to confidently make the required investment to increase the overall workforce over the next few years. Suppliers are expected to take all reasonable steps to address any capacity challenges, ensuring efficient recruitment, training, and workforce management to minimise potential disruption within the industry.
- Technological and policy advances mean that technical barriers either have been, or are being, resolved, either by suppliers or key industry partners such as the DCC. For example, the DCC has extended the use of 4G communications into the CSP-North. This enables suppliers to use either the 4G mobile network or the Long-Range Radio network in the CSP-North, in support of improved first-time installation success rates. In addition, subject to a successful soft launch trial for Virtual WAN (VWAN) using 4G communications hubs in early 2026, broadband can be used, with consumer consent, to connect homes without WAN coverage to the national communications network for smart metering. This means that remaining consumers who have no Smart Metering WAN service, but consent to their broadband being used, could be eligible for smart meters.
- The additional policy interventions outlined below under 'Policy Interventions' will further support the rollout.

We do not agree that the obligation to take all reasonable steps to install smart meters should apply only to electricity meter points. Smart meters provide significant benefits for gas consumers. Gas forms a substantial part of both consumer savings and carbon reductions, and many of the benefits from smart meters – both for suppliers and for consumers – are realised when both fuels are served by smart meters, such as remote top-up for prepayment customers and more accurate billing without manual meter readings. Ensuring gas smart meter installations continue avoids the cost and complexity associated with a mixed 'smart electricity/traditional gas' estate whereby both suppliers and consumers only have a smart service for one fuel. Mains gas is still prevalent in Great Britain, serving around 80% of premises and supplying a substantial portion of cooking and space heating energy needs. Residential gas demand will likely decline throughout the 2030s, but will still likely be significant into the 2040s[40]. Removing the obligation for gas meters would therefore forgo material benefits while the gas network remains in use and would lead to poor consumer experiences,

[38] Smart Energy GB, May 2025, unpublished. A survey of 7854 GB adults, fieldwork was conducted online and via CATI in May 2025. Weighted to be nationally representative.
[39] Smart Metering Policy Framework – Post 2025: Annex A: Analytical Evidence
[40] Carbon budget and growth delivery plan - GOV.UK

such as still having to provide manual readings and not being able to access pre-payment remote top-up for gas meters.

The Final Impact Assessment published alongside this response demonstrates that the approach set out in this response will deliver a net benefit to Great Britain of between £599m and £1,861m (based on 85% to 100% smart coverage being achieved by the end of 2030). This includes energy savings and time saving benefits to consumers of between £378m and £1,151m, and benefits to suppliers between £433m and £1,321m depending on the level of smart coverage achieved. The increased smart meter coverage also generates environmental benefits in the form of carbon and air quality benefits which amount to £190m-£572m, as well as wider network and demand shifting benefits which all support the Clean Power 2030 Mission.[41] We note that metering costs are covered in the price cap, which is governed by Ofgem. Every additional smart meter added to the system brings a net benefit and it therefore remains beneficial to continue the rollout of smart meters.

We do not consider it necessary to include additional allowance for churn. The majority of meters in Great Britain are already smart meters, and the obligation drives towards universal smart meter coverage by the end of 2030, meaning that the vast majority of meters churned to another energy supplier should already be smart meters. Annual resubmission of deployment plans will enable energy suppliers to accurately reflect changes in portfolios between years.

Consumer equity and protections

We agree that it is vital that the provision of smart meters is equitable for all consumers across Great Britain. The government wants all consumers to benefit from smart metering, no matter their situation.

The requirement to complete the domestic smart meter rollout by the end of 2030 will help ensure that no consumer is left behind in the smart meter rollout.

As set out in more detail in Section 1, the importance of ensuring that consumers with disabilities and those in vulnerable circumstances are fully supported remains a core principle of the smart meter rollout, which is inclusive by design, and which is underpinned by comprehensive and robust consumer protections principally set out in the Electricity and Gas Supply Licence Conditions.

As part of their deployment plans, suppliers will be required to provide Ofgem with plans for consumer engagement, including taking account of the needs of their domestic customers on the basis of their Personal Characteristics or vulnerable situation. See Section 3 for further detail.

We recognise that smart meters offer significant benefits to prepayment customers. As of the end of December 2024, 12% of domestic smart meters were in prepayment mode, which is broadly in line with traditional prepayment meters (PPM) in the domestic market (two thirds of

[41] All figures are totals over the 10-year appraisal period spanning 2026-2035 (figures are discounted to 2026 and are in 2025 prices)

PPMs are now smart meters).[42] We note that energy suppliers already have strong commercial incentives to install smart meters for prepayment customers, given the operational cost savings and improved customer service this allows. We continue to advocate for energy suppliers, SEGB and consumer groups to provide inclusive, tailored messaging for consumers using traditional prepayment to encourage them to take up the offer of smart meters. As areas of low smart meter and high traditional prepayment meter coverage have a correlation with Private or Social Rented Sector occupancy, we anticipate that our work to strengthen the rights of domestic tenants in getting a smart meter will have a positive impact on smart prepayment coverage (see 'Policy Interventions' below).

We consider that the introduction of sub-targets for certain consumer segments would risk detracting from the overall obligation to complete the smart meter rollout and may lead to unintended consequences such as inequity for other consumer segments or a more inefficient rollout. For example, we consider that prioritising the replacement of traditional PPMs could risk the unintended consequence of smart meter installations for credit consumers, many of whom are also in vulnerable circumstances, being de-prioritised. We expect energy suppliers to continue proactively replacing traditional PPMs with smart, and we will be working with Ofgem to ensure an appropriate level of scrutiny is given to the upgrade of traditional PPMs.

The Guaranteed Standard of Performance (GSOP), introduced by Ofgem, to offer first-time smart meter installation appointments within six weeks of a customer request should significantly improve the waiting times for those consumers who ask their suppliers for a first-time smart meter installation. This will apply to all consumers and is likely to be particularly beneficial to those in more remote geographical areas, those on flexible tariffs or PPMs, and vulnerable consumers.

DESNZ and Ofgem will continue to work closely with a range of organisations, including Citizens Advice and National Energy Action, to monitor supplier performance to ensure no consumer is left behind in the rollout, and make appropriate interventions if issues arise.

Policy interventions

We have provided an updated list below of the measures being explored, or recently actioned, to further support consumer demand and ensure an equitable rollout alongside the 2030 rollout obligation. In addition to these measures, the government will continue to consider other ways in which policy can support the rollout.

- **Flexibility and low carbon technology**: The Clean Power 2030 mission is expected to drive higher demand for smart metering benefits, such as smart tariffs, particularly for users of low carbon technology, as well as leveraging benefits provided by the Market-wide Half Hourly Settlement. We note that, in line with the government's Warm Homes Plan, low carbon technology use is expected to rapidly increase across Great Britain in this period. We would encourage suppliers to make full use of these opportunities by deploying smart-contingent tariffs and related incentives.

[42] Smart meters in Great Britain, quarterly update September 2025 - GOV.UK

- **Energy efficiency funds**: We have ensured that advice on the benefits of smart meters was provided to recipients of retrofit measures, such as the Home Upgrade Grant, the Local Authority Delivery scheme, and the Social Housing Decarbonisation Fund.
- **The Future Homes and Buildings Standards (FHBS)**: Government has consulted on enhanced guidance to help ensure that new builds are smart-meter-ready from the outset, and will publish its response to the consultation in due course.
- **Energy Performance Certificates (EPC)**: We have met our commitment to include a check for the presence of a smart meter when a full[43] or reduced[44] assessment of a home's energy and environmental performance takes place, with advice on how to get a smart meter included on the EPCs in properties where one is not present. Further to this, the government is working towards reforming EPCs, including considering how and where to best reflect smart capability within future metrics.[45] A consultation was launched to this effect on 21 January 2026, including recommending smart meters are necessary to achieve a "Smart Readiness Metric" rating of C.
- **Minimum Energy Efficiency Standards (MEES):** Related to the wider EPC reform, consultations took place in 2025 on improving the energy efficiency of privately rented homes in England and Wales, and of socially rented homes in England. Both consultations sought views on actions the government could take to increase deployment of smart meters in the rented sector. The government published a summary of responses to the Social Rented Sector MEES consultation in January 2026.[46] The government also published a response to the Private Rented Sector MEES consultation in January 2026.[47]
- **Electric vehicles**: We will continue to work with stakeholders to raise awareness that smart meters enable smart tariffs which can help reduce the cost of charging for electric vehicle users, such as updated advice on the Energy Savings Trust website.[48]
- **Heat pumps**: We are working to ensure that relevant information is provided to householders having heat pump installs, with messaging on the benefits of smart meters now provided as part of a new government webpage which supports a clean energy consumer campaign.[49]
- **Smart Export Guarantee (SEG)**: A smart meter or an export meter capable of half-hourly readings is required under the Smart Export Guarantee scheme, which replaced the Feed-In Tariffs scheme.

[43] SAP 10.2 specification 14-03-2025
[44] RdSAP 10 Specification 10-06-2025
[45] Home Energy Model: Future Homes Standard assessment - GOV.UK, DESNZ (2023)
[46] Consultation outcome: Improving the energy efficiency of socially rented homes in England: summary of consultation responses. – GOV.UK, DESNZ (2026)
[47] Consultation outcome: Improving the energy performance of privately rented homes: government response – GOV.UK, DESNZ (2026)
[48] Electric vehicles: all you need to know - Energy Saving Trust
[49] Save energy in your home - Clean Energy Homepage

- **Tenants' rights:** We are exploring ways to drive the uptake of smart meters amongst renters and are considering the primary powers that may be necessary to deliver any policy. To the extent that new primary powers are required, we will seek to identify an appropriate legislative vehicle which will be dependent on parliamentary time.
- **Local authority co-branding:** SEGB has a range of campaign resources that are available for co-branding with local authorities, and has worked with several local authorities to deliver targeted campaign activity on a number of occasions. We will continue to ensure such opportunities are available.

Question 11

Summary of responses to Question 11

Do you agree with the proposal to extend the Data Request powers to five years after 31 December 2030? Please provide rationale and evidence to support your answer.

	Agree	Agree with Caveats	Neutral	Disagree with Caveats	Disagree	No Response
Respondents	20	2	13	0	0	29

Of a total of 64 respondents, 35 provided answers to this question. The majority of those (63%, 22 of 35) agreed, or agreed with caveats, with the proposal to extend the Data Request Powers for five years after 31 December 2030. No respondents disagreed or disagreed with caveats with the proposal, and the remaining 13 responses were neutral.

A small number of respondents highlighted that such Data Request Powers were important for accountability in the smart meter rollout and for monitoring maintenance of smart meters. A few respondents requested that reporting requirements be reduced where possible, suggesting that DESNZ and Ofgem work to ensure minimal overlap in data requests to avoid additional workload for energy suppliers. One respondent made a specific request to ensure that data requests would cover payment type, housing tenure, and whether consumers were considered vulnerable.

Government response to Question 11

The government will extend the Secretary of State's power to request rollout data for a further five years beyond 31 December 2030. Most of those who responded to this question agreed or agreed with caveats, and none disagreed. We consider the extension to be a pragmatic step that ensures continued oversight of rollout progress under the Post 2025 Framework. It ensures that the necessary tools remain in place to maintain accountability through the later stages of the rollout, while also enabling a robust evaluation of delivery and outcomes after 2030.

Section Three – Conclusion

DECISION 5: To proceed with the obligation for energy suppliers to take all reasonable steps to complete the smart metering rollout in domestic premises by 31 December 2030.

DECISION 6: To extend the Secretary of State's power to request rollout data for a further five years beyond 31 December 2030.

Section Four: Monitoring progress and ensuring accountability

Question 12

Summary of responses to Question 12

Do you agree that we should require energy suppliers to provide Ofgem with annual deployment plans and report progress against those deployment plans, with annual milestones setting out what activities they will undertake each year for the domestic sector, to meet their smart meter installation, pre-emptive replacement, and operational obligations? If you disagree, please suggest alternative approaches that would enable monitoring and achieve accountability to ensure energy suppliers take sufficient action each year to meet the obligations set out in Sections 1 and 2 of the consultation. We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

	Agree	Agree with Caveats	Neutral	Disagree with Caveats	Disagree	No Response
Respondents	24	13	2	0	1	24

Of a total of 64 respondents, 40 provided answers to this question. Most respondents (92%, 37 of 40) agreed, or agreed with caveats, with the proposal for energy suppliers to provide Ofgem with annual deployment plans and report progress against those, with annual milestones setting out domestic sector activities that will be undertaken to meet their smart meter installation, pre-emptive replacement and operational obligations. One respondent asserted disagreement to the proposal and provided no evidence. The remaining few respondents were neutral.

Those who agreed argued that deployment plans would add value through increased transparency. A few respondents commented that this would benefit future planning, with one specifically calling out the benefit to demand projections and resource investment, and the other commenting that forward planning would result in less risk to the supply chain.

Equally, those who agreed generally noted that the proposal would increase accountability. One respondent stated that regular reporting would strengthen accountability and reduce current portfolio risk and another respondent stated that accountability (and transparency) is required to maintain confidence in the smart metering rollout.

A few respondents commented that the proposed interim milestones would be beneficial in identifying risks and delays early, with one trade body stating that deployment plans would allow the Regulator to be more effective, enabling timely action to be taken.

The minority of respondents who agreed with caveats to the proposal either raised matters in relation to tolerances, or with the approach taken by the Regulator when assessing and rejecting deployment plans and managing circumstances that are outside of a supplier's control or with the role of the Data Communications Company (DCC) when approving deployment plans. A small number raised considerations with the Radio Teleswitch Service (RTS) and lessons learned in relation to this.

Government response to Question 12

We confirm that we are proceeding with the proposal to require energy suppliers to provide Ofgem with annual deployment plans and report progress against those deployment plans, with annual milestones setting out what activities they will undertake each year for the domestic sector, to meet their smart meter installation, pre-emptive replacement and operational obligations. Annual milestones will be set separately for each fuel type (gas and electricity) within the deployment plan. We agree with respondents' views that deployment plans will ensure suppliers are held accountable for achieving their obligations, support improvements in consumer experience, and allow suppliers to set milestones to deliver their planned activities over time and in a way that accounts for their portfolio of meters to optimise delivery of their obligations. In relation to RTS, as this is an ongoing situation, the government will continue to engage with Ofgem, industry and elected representatives on this matter. The matters raised by respondents in relation to the design of deployment plans are considered in the responses below.

Question 13

Summary of responses to Question 13

Do you agree that (a) the annual milestones for new installations and pre-emptive replacements should be binding and without tolerances, and (b) the annual milestone for smart meters operating in traditional mode should be non-binding? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

	Agree	Agree with Caveats	Neutral	Disagree with Caveats	Disagree	No Response
Respondents Part (a)	13	5	2	5	8	31
Respondents Part (b)	20	1	2	3	5	33

Part (a): Binding annual milestones for new installations and pre-emptive replacements

Of a total of 64 respondents, 33 provided answers to part (a) of this question. A large number of those (54%, 18 of 33) agreed, or agreed with caveats, with the proposal for annual

milestones to be binding without tolerances. Some respondents (39%, 13 of 33) disagreed or disagreed with caveats. The remaining two respondents were neutral.

Respondents who supported this proposal highlighted the importance of binding milestones without tolerances for maintaining momentum and delivery, especially for those consumers at risk of exclusion from the rollout. Other respondents indicated that such an approach would provide greater certainty to the wider market and reinforce supplier accountability by driving monitoring, oversight and enforcement by Ofgem. One respondent indicated that binding milestones were significant for safeguarding those consumers most at risk of exclusion from the rollout, whilst another argued that binding milestones without tolerances would better inform portfolios and allow better management of the risk of stranded assets and unnecessary meter removals.

Some respondents who disagreed, or disagreed with caveats, advocated for the inclusion of tolerances within milestones determined by suppliers, citing several considerations as set out below.

Some respondents argued that there are challenges when forecasting annual milestones, which means that an accurate forecast is not possible. Some respondents stated that this was due to the volatility of market conditions which can affect assumptions. Some cited customer engagement/demand, refusal rates and technical issues related to DCC coverage, as examples of events outside of suppliers' control. Others cited that forecasting inaccuracies were likely due to the new activity of 2G/3G communication hub replacements, whilst others cited the increased variety of activities as being a contributory factor.

Some respondents expressed concern that suppliers may opt for submitting low risk plans to avoid the prospect of rejection and penalties, potentially resulting in under-delivery against milestones. A few other respondents stated that without tolerances, suppliers may be forced to submit higher risk plans that are not achievable to avoid Ofgem rejecting the plan. A few respondents noted there may be a risk of increased administrative burden without tolerances, as suppliers may choose to request resubmission of plans to avoid compliance action.

Some respondents argued that a tolerance would act as a pragmatic buffer that reflects the difficulties of forecasting milestones, whilst reducing the risk of small divergences that could trigger disproportionate compliance activity. Similarly, a few respondents were of the view that tolerances would allow for adjustments to their plans without the threat of penalisation. They highlighted the risk of being penalised for missing milestones due to external factors, even if compliance with the All Reasonable Steps obligation is maintained.

A few respondents suggested that tolerances would provide flexibility to underachieve against one milestone and overachieve against another. Without tolerances, suppliers would redirect resources where one activity is outperforming forecasts, to meet another milestone perfectly. A few respondents suggested that all milestones should be non-binding, whilst another respondent proposed a single milestone aggregated across all activities could be binding in order to manage consumer demand, interrelated workstreams and variation in priorities such as RTS.

Part (b): Non-binding annual milestone for smart meters operating in traditional mode

Of a total of 64 respondents, 31 provided answers to part (b) of this question. The majority of those (67%, 21 of 31) agreed, or agreed with caveats, with the proposal for the annual milestone for smart meters not operating in smart mode to be non-binding. Some respondents (26%, 8 of 31) disagreed or disagreed with caveats. The remaining two respondents were neutral to the proposition.

Respondents who agreed with the proposal stated that this milestone would complement Ofgem's proposed smart metering Guaranteed Standards of Performance (GSOP), ensuring consistency and incentivising suppliers to maintain smart operations in line with consumer expectations. Some respondents highlighted that the milestone being non-binding would provide suppliers with flexibility and recognises that factors which can contribute to meters not operating in smart mode, such as DCC performance issues and customer cooperation, may be outside of suppliers' direct control.

Some respondents questioned the value of requiring a milestone for smart meters operating in traditional mode, suggesting it duplicated obligations under the proposed GSOP. A few respondents also highlighted the difficulty in accurately forecasting the number of meters that may fall into traditional mode within a given year, with some respondents calling for the milestone to be removed entirely.

One respondent, while supportive of the milestone in principle, argued that it should be binding. This respondent proposed that the milestone should require minimum percentage improvement year-on-year, thereby enhancing both better flexibility and accountability, and ensuring that pathways towards restoration are supported by realistic investment.

Government response to Question 13

Part (a): Binding annual milestones for new installations and pre-emptive replacements

We confirm that we will be proceeding with the proposal of annual milestones, determined by suppliers each year, for new installations and pre-emptive replacements that are binding and without tolerances.

We consider that the ability for suppliers to set their own annual milestones under the All Reasonable Steps obligations allows suppliers sufficient flexibility to set milestones which they consider to be ambitious and achievable based on their individual portfolios, and to determine the right balance of different activities each year to meet their overall requirements. This provides significantly more flexibility than the 2022-2025 Targets Framework, where tolerances were considered necessary owing in part to binding targets being determined centrally on a market-wide basis.

We further note that suppliers will have additional flexibility through resubmission of plans each year, and the ability to request re-submission of plans in-year (see response to Question 14).

Comparison to previous Frameworks

The rollout is significantly more mature than when tolerances were provided for annual milestones under the pre-2020 Framework (later extended to 2021), with several years' evidence of rollout progress and operational delivery both under the previous pre-2020 Framework and under the 2022-2025 Targets Framework. We are also at a different point in the rollout, where pre-emptive replacements are necessary ahead of communications service end-dates in order to avoid loss of smart services. Significant consumer detriment would occur if these were missed, and we consider that tolerances would increase the risk of these deadlines being missed.

In the pre-2020 Framework, which included deployment plans with tolerances, a lesson learnt was that on balance, tolerances did not drive better delivery or higher ambition. The volume of installations achieved by suppliers did not follow a consistent pattern relating either to milestones or tolerances. Performance data from 2017, 2018 and 2019 was mixed, whereas if tolerances assisted suppliers in increasing ambition, one would expect a more consistent pattern of suppliers meeting their milestones, or just missing them, but still being within the tolerance. In some cases, tolerances may have lowered ambition by allowing suppliers to aim toward a new lower threshold, which they still didn't meet.

The government encourages suppliers to be as ambitious as possible when setting their milestones for deployment plans. Previous experience suggests that adding a market-wide tolerance would, at best, make only a limited positive difference either to the ambition level of deployment plans or to suppliers' ability to meet their self-determined milestones, and at worst could lower ambition, as it would likely be inherent in suppliers' forecasts and therefore could simply become the new threshold at which regulatory engagement with Ofgem may occur. This would risk obligations not being met by the relevant deadlines, which would lead to consumer detriment, particularly for pre-emptive replacements.

Concerns around forecasting accuracy

The rollout is now at an advanced stage, and many suppliers are currently already providing Ofgem with significantly more granular forecasting of their new installation, operational requirements, and RTS replacements.

We recognise concerns that it may be harder at first to accurately predict, at a granular level, newer activities such as large-scale pre-emptive replacements. However, much of this activity started in 2025, and large suppliers have already responded to RFIs that forecast SMETS1 replacements to 2033. As the milestones will not be binding before 2027, suppliers can use 2026 to further test their forecasting and operationalising of these activities, including through submission of the first deployment plan with non-binding milestones in June 2026.

We consider that setting a market-wide de minimis tolerance to account for minor forecasting errors would not eliminate the challenge of forecasting but instead would risk simply changing the threshold at which potential regulatory engagement over marginal misses occur. In addition, any market-wide tolerance would not be able to take account of individual (as opposed to market-wide) circumstances which may cause suppliers to miss their self-set

milestones, which is likely to be relevant given different suppliers have different portfolios of meters which may lead to different opportunities and challenges over the period. Ofgem already has the discretion to consider proportionality and performance in the round.

Offsetting between milestones

In addition to considering requests for market-wide tolerances, we also considered the suggestion that tolerances should be used to allow suppliers to offset overachieving against one milestone against underachievement of another milestones (i.e., fungibility).

We recognise that introducing partial fungibility (e.g., <10% of each milestone can be offset against another) or total fungibility (i.e., 100% of each milestone can be offset against another) between milestones, provided that the aggregate total for all activity is still met, would provide a degree of flexibility to overachieve on one milestone and underachieve against another. However, we consider that this would risk skewing one milestone in favour of another in-year, which would increase the risk of consumer detriment, as it would increase the risk of deadlines not being met. We also considered that offsetting different milestones could lead to gaming between milestones which are harder and easier to achieve or which have different end dates, which would similarly increase the risk of consumer detriment from milestones not being met. Finally, we considered that introducing fungibility between milestones would significantly increase the complexity of the licence conditions.

As with tolerances, we note that Ofgem already has the discretion to consider performance in the round and proportionality when considering compliance or enforcement action. When assessing annual compliance with licence conditions, we expect that Ofgem, as a reasonable Regulator, would consider a holistic approach to assessing performance which aims to ensure that licence holders demonstrate overall resilience and responsibility in managing their obligations.

We consider that an approach where there are binding milestones without tolerances is better able to take into account circumstances that affect individual suppliers, rather than a pre-determined market-wide tolerance or fungibility between milestones.

For these reasons, the government has therefore concluded that there should be annual milestones set by suppliers for new installations and pre-emptive replacements that should be binding and without tolerances, in order to support optimal outcomes for consumers.

Part (b): Non-binding annual milestone for smart meters operating in traditional mode

We confirm that we will be proceeding with a non-binding annual milestone determined by suppliers for recovery of smart meters operating in traditional mode.

It is essential that consumers receive a high-quality service from their smart meters operating in smart mode. The strengthened Operational Licence Condition, to require suppliers to take all reasonable steps to resolve smart meters operating in traditional mode as soon as possible and within 90 days, aims to improve the quality of service consumers receive by ensuring speedy resolution of any issues (see response to Question 5).

We consider that a milestone for smart meters operating in traditional mode is necessary to enable suppliers to provide a complete picture of their smart metering activity, including prioritisation of activity within their individual portfolios. This will provide supporting information that helps justify suppliers' binding milestones for installations and pre-emptive replacements. It will also help increase confidence that suppliers are taking the necessary action to uphold high standards of consumer experience at all times, by tracking progress on recovery of smart meters operating in traditional mode alongside other requirements.

The milestone will be non-binding in recognition that predictions beyond a general trend for the year ahead are more challenging for smart meters operating in traditional mode.

We expect energy suppliers to take action in 2026 to ensure they meet their obligations by significantly increasing the numbers of smart meters operating in smart mode and improving consumer experience, as well as continuing new installations, accelerating pre-emptive replacements, and putting plans in place to ensure they will have sufficient workforces to deliver against their requirements to 2030 and beyond.

Table 1: Summary of Annual Milestones that will be introduced

Activity	Annual Milestone	Binding or non-binding
New installations	The total number of smart meter installations that is to be installed in the year ahead, per fuel type (referred to as the Annual Rollout Milestone)	Binding
Pre-emptive replacements	The total number of SMETS1 replacements that is to be replaced in the year ahead (referred to as the Annual SMETS1 Milestone) and the total number of communication hub replacements that is to be replaced in the year ahead, per fuel type where relevant (referred to as the Annual CH Milestone).	Binding
Smart meters operating in traditional mode	The total number of meters operating in traditional mode that suppliers will recover by the end of the year, per fuel type (referred to as the Annual Operational Milestone).	Non-binding

Question 14

Summary of responses to Question 14

Do you agree that energy suppliers should (a) be required to submit updated deployment plans annually, and (b) be able to request re-submission to Ofgem in-year, in response to exceptional events that have a significant and negative impact on their ability to meet their annual milestones? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

	Agree	Agree with Caveats	Neutral	Disagree with Caveats	Disagree	No Response
Respondents Part (a)	31	1	2	1	0	29
Respondents Part (b)	31	1	3	1	0	28

Out of a total of 64 respondents, 35 provided an answer to part (a) of this question. Most of those (91%, 32 of 35) agreed, or agreed with caveats, with the proposal that energy suppliers should be required to submit updated deployment plans on an annual basis**.**

Out of a total of 64 respondents, 36 provided an answer to part (b) of this question. Most of those (88%, 32 of 36) agreed, or agreed with caveats, with the proposal that energy suppliers should be permitted to request re-submission to Ofgem in response to exceptional events that may adversely affect the achievement of annual milestones.

Respondents who supported the proposals in this question generally considered them to be reasonable, noting that such provisions would enable suppliers to adjust their plans in light of internal and external factors that significantly impacted delivery. A few respondents emphasised the importance of ensuring that plans remain pragmatic and flexible, particularly in relation to circumstances beyond suppliers' control.

Some respondents sought further clarification as to what would constitute an 'exceptional event', recommending that Ofgem provide a clear definition and examples in its guidance to ensure consistency and mitigate against the risk of administrative burden for suppliers due to a lack of clarity.

A few suggested that the definition should be tightly controlled, only for truly exceptional "force majeure" events, with criteria provided to prevent misuse and avoid adverse impact on vulnerable consumers. One respondent asserted that planned or predictable exceptional circumstances such as mergers, acquisitions or Supplier of Last Resort (SoLR) activities

should not be factored in, as the acquiring entity would normally incorporate considerations in its deal parameters.

One suggested that the definition should accommodate any exceptional event that are outside a supplier's control, beyond market-wide impacts. Another suggested that 'exceptional events' should apply to anything that impacts a supplier's ability to achieve their binding milestones.

Additionally, a few respondents argued that guidance should be provided to suppliers to ensure that the re-submission process is adequately understood.

A few respondents asserted that deployment plans should be reviewed on a more frequent basis (e.g., quarterly or six monthly) to reduce backloading and mitigate against any regulatory gap arising in 2026.

Government response to Question 14

We confirm that we will be proceeding with annual resubmission to update the deployment plans each year, and that suppliers will be able to request re-submission to Ofgem in-year.

We consider that this provides the right balance by enabling monitoring on an annual basis, whilst providing flexibility by allowing for resubmission in-year in response to exceptional events. Whilst we acknowledge that there could be some value in more frequent re-submissions, this would increase the administrative burden on suppliers and Ofgem, whilst increasing the risk of compounding any underperformance.

Whether re-submission requests are accepted, including the definition of what constitutes an 'exceptional event', is for Ofgem to decide. As such, we have not provided a definition for exceptional events in the legal drafting. Ofgem may consult further on the implementation of deployment plans which could include details around resubmission of plans in-year.

Question 15

Summary of responses to Question 15

> *Do you agree that the date from which the annual milestones for new installations and pre-emptive replacements should be binding is 1 January 2027? If you disagree, please provide an alternative earliest date, including rationale for how this would be achieved.*

	Agree	Agree with Caveats	Neutral	Disagree with Caveats	Disagree	No Response
Respondents	22	2	4	2	8	26

Of a total of 64 respondents, 38 provided an answer to this question. The majority of those (63%, 24 of 38) agreed, or agreed with caveats, with the proposal that milestones should be

binding on 1 January 2027. Some respondents (26%, 10 of 38) disagreed or disagreed with caveats. The remaining four responses were neutral.

Respondents expressing support for the proposal noted that it provides suppliers with sufficient time to prepare for the implementation of the framework, continue momentum and mobilise required engineering capacity, with one respondent noting this was particularly the case given the volume of work to be completed by the end of 2030. Similarly, another respondent welcomed a transitional year in 2026, suggesting it affords suppliers time to test and refine internal processes ahead of the new Framework's commencement. In addition, some respondents expressed support for the regulatory certainty brought by the consultation's publication, noting its positive effect on investment confidence in smart meter market, and a few added that this would provide supply chains with adequate time to prepare and align with anticipated demand.

Among those who disagreed with the proposal, concerns were raised around a gap in 2026, with the potential loss of momentum in the absence of a formal framework to maintain supplier activity being cited as a risk. A few respondents also linked this risk to impacts on the supply chain and the end-to-end lifecycle of meter assets, noting that uncertainty within industry over the expected demand could hinder investment, long-term planning and supply chain transparency. These respondents wanted swifter implementation of the regime, with one respondent advocating for the continuation of the previous Targets Framework to maintain regulatory continuity until commencement of the binding milestones.

One respondent questioned whether the available time is sufficient for suppliers to recruit the necessary number of engineers, noting that insufficient numbers of engineers could result in pressurised working conditions which can lead to important details being missed.

Government response to Question 15

We confirm that the date from which the annual milestones for new installations and pre-emptive replacements will be binding is 1 January 2027. This means that each supplier must achieve these annual milestones set out in its deployment plan from 1 January 2027. Suppliers will be required to provide a deployment plan by 30 June 2026, in which the milestones for the remainder of 2026 will be non-binding, to ensure continued progress and investment towards meeting their obligations. Ofgem may specify in a Direction later submission dates and/or an additional date for re-submission of the first deployment plan, ahead of the milestones becoming binding in 2027.

We consider that this gives energy suppliers and Ofgem sufficient time to prepare for binding annual milestones in deployment plans so that the first plan can be submitted in mid-2026. Suppliers can use 2026 to further test their forecasting and operationalising of activities, including pre-emptive replacements, and to ensure they have sufficient workforce and investment in place.

Ofgem intends to issue a consultation regarding the remaining details for the implementation of deployment plans. This may include, but is not limited to:

- the precise timing of submissions for binding deployment plans and the submission for progress reports from suppliers to Ofgem in the first and subsequent years.
- any further content requirements in addition to the contents specified in the licence to inform the deployment plan and progress report
- a template for deployment plans and progress against the milestones in the deployment plans. We expect the template will prioritise the provision of quantitative data for annual milestones, along with concise supporting evidence for the milestones provided and evidence of plans to meet them.

In response to concerns that there will be a regulatory gap in 2026, the obligations to take all reasonable steps to complete the domestic rollout by the end of 2030 and to ensure smart meters operate in smart mode, including by way of pre-emptive replacements and ensuring that smart meters that fall into traditional mode are resolved as soon as possible and within 90 days, will all be in place in 2026, in addition to the existing New and Replacement Obligation (NRO) and Operational Licence Condition. Suppliers will be obliged to provide a deployment plan by 30 June 2026 (or such later date as may be specified in a Direction issued by the Authority), in which the milestones for the remainder of 2026 will be non-binding, to ensure continued progress and investment towards meeting their obligations.

We expect energy suppliers to take action in 2026 to ensure they meet their obligations by significantly increasing the numbers of smart meters operating in smart mode and improving consumer experience, as well as continuing new installations, accelerating pre-emptive replacements, and putting plans in place to ensure they will have sufficient workforce to deliver against their requirements to 2030 and beyond.

Question 16

Summary of responses to Question 16

Do you agree with the following measures to ensure deployment plans are of high quality and provide confidence that suppliers will meet their obligations:

a. Ofgem should be given the option to reject the plan and the option to provide guidance to suppliers on when it might reject the plan? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

b. That suppliers should be required to provide evidence to support justification of the annual milestones, including justification for any numerical difference between the milestones provided for new installations and pre-emptive replacements, and a straight-line path to the relevant end-date, and supporting information on workforce and consumer engagement? Are there additional quantitative or qualitative information requirements that should be included in the deployment plan to support the assessment and justification of milestones? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

c. Do you agree that each supplier's deployment plan should be (a) approved by the supplier's Board and (b) milestones and progress against those milestones published on the supplier's website? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

d. If you disagree, with Q16. a), b) or c), are there alternative or additional design approaches that would reduce the risk of activities concentrated towards the end-dates within the plan and/ or to subsequent revisions to that plan? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.

	Agree	Agree with Caveats	Neutral	Disagree with Caveats	Disagree	No Response
Respondents Part (a)	16	8	3	3	2	32
Respondents Part (b)	17	6	4	1	4	32
Respondents Part (c) (a)	21	6	3	0	1	33
Respondents Part (c) (b)	21	4	3	0	3	33

Part (a): Ofgem option to reject a plan and to provide guidance

Of a total of 64 respondents, 32 provided an answer to part (a) of this question. Most of those (75%, 24 of 32) agreed, or agreed with caveats, with the proposal for Ofgem to be given powers to reject plans. A small number of respondents (15%, 5 of 32) disagreed or disagreed with caveats. The remaining three responses were neutral.

Of the respondents who agreed with this proposal, some did so on the basis that it would be the most effective way to mitigate the risk of suppliers submitting unambitious milestones. Others agreed on the basis that the approach would support better co-ordination across the supply chain and improve strategic oversight of market challenges or that such powers would encourage suppliers to set ambitious yet achievable milestones, underpinned by robust justification. One respondent agreed with the proposal but recommended, in addition, that the DCC provides a view on individual and aggregated supplier plans which Ofgem must consider in its decision to approve or reject plans. Their view was that this would ensure that the aggregate deployment planning picture aligns with the DCC's service level planning and also indicate views on cost-effective opportunities for swap-out activity.

Respondents who disagreed raised concerns about Ofgem's capacity to assess the plans and whether they were best placed as an organisation to do this. A few respondents wanted clarity and transparency from Ofgem on when it might reject a deployment plan and highlighted the need for Ofgem to issue criteria outlining the grounds for approval and rejection as well as providing a definition of 'all reasonable steps'. It was suggested that such guidance would add clarity and reduce the likelihood of plans being rejected, ensuring that rejections are based on

compelling and unambiguous evidence to demonstrate where supplier plans were not credible or of low quality. There were also calls for Ofgem to work collaboratively with suppliers to address concerns and foster a shared understanding of the assumptions underpinning the milestones set. Another respondent advocated for Ofgem to be transparent in their reasoning for rejection and communicate constructive and actionable feedback in a timely manner. A few respondents asserted that there should be a requirement on Ofgem to only reject a plan where there is unambiguous and compelling evidence that suppliers do not meet the 'all reasonable steps' requirement for both the annual milestones and within the context of the overall framework and noted a lack of process for appeals, with one respondent suggesting that the Competition Authority should be used as an appeal body as for Smart Energy Code (SEC) Modifications.

A few considered the process for rejecting a plan to be slow and burdensome and proposed that the period of 40 days to reject a plan is reduced to 10 or 20 days to minimise delay and ambiguity.

Part (b): Justification for annual milestones

Of a total of 64 respondents, 32 provided an answer to part (b) of this question. The majority of those (72%, 23 of 32) agreed, or agreed with caveats, to suppliers being required to provide evidence to justify annual milestones, including justification for differences between a straight-line pathway and their proposed milestones for new installations and pre-emptive replacements, as well as supporting information on workforce and consumer engagement. A small number of respondents (16%, 5 of 32) disagreed or disagreed with caveats to the proposal. The remaining four responses were neutral.

Respondents who agreed with this proposal considered it reasonable to provide evidence to justify annual milestones, including numerical differences between the milestones provided for new installation and pre-emptive replacements and a straight-line path to the relevant end date. One respondent further stated that it is reasonable to expect divergence from a straight-line path, given internal and external factors, but that this should be explained by suppliers against a straight-line path.

A small number of respondents disagreed. Of those, some stated that the requirement to justify against a straight-line trajectory, alongside Ofgem's power to reject deployment plans, would create unrealistic expectations akin to mandating a straight-line path and creating an expectation that suppliers are to deliver at the very top of their projected targets. They argued this is unlikely to be achievable without additional policy changes to support the rollout.

A few further suggested that a straight-line path would not take into account the variables which could impact real world delivery plans, and would deny flexibility to deal with conflicting priorities of installations and 4G replacement activities, which could risk customers being left without smart services. A few respondents considered that a straight-line path is unlikely to be the most efficient or proportionate path, particularly for SMETS1 meters, such as before the end of their asset life.

A few suggested that previous concerns about backloading are no longer material and that suppliers should be permitted to manage the remainder of the rollout as they see fit.

Part (c) Subsection (a): Board approval

Of a total of 64 respondents, 31 provided an answer to part (c) subsection (a) of this question. Most of those (87%, 27 of 31) agreed, or agreed with caveats, that deployment plans should have Board approval from the supplier. One respondent disagreed with the proposal. The remaining three responses were neutral.

Many in agreement stated that the supplier's Board was the appropriate level of sign-off and welcomed this level of accountability. Several respondents considered that Board sign-off would ensure appropriate ownership, as well as accountability, for setting and achieving deployment plans. While in agreement with the proposal, a few respondents suggested that Board approval could be inefficient due to the infrequency of Board meetings and that, alternatively, a sufficiently senior individual in the organisation could be appointed to approve.

Part (c) Subsection (b): Publication

Most respondents (80%, 25 of 31) agreed, or agreed with caveats, to part (c) subsection (b) of this question. Three respondents disagreed with the proposal. The remaining three responses were neutral.

The respondents who agreed considered that the proposal to require publication of milestones and progress against them on suppliers' websites would enable transparency and public scrutiny, with one consumer group commenting that public reporting is valuable in maintaining pressure for equitable delivery of deployment plans. Similarly, another respondent welcomed the publication of key activities, stating that this would aid the smart meter rollout by ensuring that successful deployment strategies were shared and not retained by individual suppliers, benefiting the entire market. One respondent in agreement with the proposal suggested that Ofgem also compiles and publishes a standardised comparative plan that includes all energy suppliers and progress against their individual targets, noting that this may encourage suppliers to remain ambitious and introduce a degree of competition.

A few respondents commented that there may be an administrative, and possible financial, burden associated with publishing milestones on supplier websites. Of those, some stated they did not see the need for, or benefit of, publishing milestones and progress on suppliers' websites, with one believing that this already occurs through publication of installation volumes, two suggesting that this activity would not alter supplier behaviour, and another offering an alternative approach whereby anonymised benchmarking data showing the deployment profile for each supplier is distributed, allowing suppliers to compare progress.

Part (d): Alternative or additional design approaches that would reduce the risk of activities concentrated towards the end-dates

A small number of respondents who disagreed with (a), (b), or (c) provided alternative or additional design approaches that they consider would reduce the risk of activities

concentrated towards the end-dates within the plan, and/or to subsequent revisions to that plan.

A few respondents mentioned a need for deployment plans to consider and address the disparities that have impacted consumers in specific regions of the country. A few suggested that data should be provided, such as regional breakdowns by local authority or Distribution Network Operator (DNO) region, or other data on regional disparities, with the view that this would provide Ofgem with oversight on regional inequalities in the smart meter rollout and drive greater equity in the delivery of the rollout.

One consumer group suggested that interim milestones and regular progress reviews should be introduced to discourage backloading and ensure steady delivery.

One respondent suggested there were opportunities that can be accessed in new development sites and that better coordination of engineer activity could be enabled to support replacements without inconveniencing consumers, though noted the move away from regional approaches to activities across industry.

Government response to Question 16

Part (a): Ofgem option to reject a plan and provide guidance

We confirm that deployment plans will be subject to review by Ofgem, and that Ofgem will be given the option to reject deployment plans and to provide guidance on when it might reject the plan.

In response to concerns raised by respondents that 40 days from submission is too long for Ofgem to confirm in writing its reasons for rejecting the plan, we will shorten the period to 28 days. Shortening the period in which Ofgem can reject a plan from 40 to 28 days is considered reasonable to allow sufficient time for assessment and is commonly used elsewhere in the supply licence. If Ofgem rejects the plan, the supplier will then be required to submit, by a date specified by Ofgem, a further deployment plan.

We note that Ofgem has similar powers to reject plans, for example in relation to financial resilience and controls,[50] and that suppliers also re-submitted plans to Ofgem in response to Ofgem's comments under the pre-2020 Framework.

We confirm that Ofgem will have the power to provide relevant guidance. This may include any criteria that Ofgem would have regard to in considering whether to reject a deployment plan. For example, where suppliers have not demonstrated an acceptable level of trajectory towards the relevant obligations. Suppliers would be required to have regard to the guidance that may be issued and, from time to time, revised by Ofgem.

Ofgem intends to issue a consultation covering the details of regulatory oversight of deployment plans in 2026. This may include, but is not limited to, a template for deployment plans and progress against those plans, any further content requirements in addition to the

[50] SLC 4B Electricity Supply Licence: Financial

contents specified in the licence and the precise timing of submission for binding deployment plans, and subsequent progress reports from suppliers to Ofgem.

We do not consider it necessary for the DCC licence obligations to expand to give the DCC a formal role in the deployment planning process whereby energy suppliers are required to share individual plans with it before sending to Ofgem for final sign-off, since the DCC will have visibility of milestones and progress via suppliers' websites (as set out in our response to Q16(c)). Furthermore, introducing this additional activity could lengthen the process and/or result in delay to the implementation of plans.

Part (b): Justification for annual milestones

We confirm that suppliers will be required to demonstrate how their deployment plans will comply with their new installation, replacement and operational obligations, including against each of the relevant end dates: 2030 as regards new installations, and the relevant end dates as set out in DCC's Communication Availability Statement (see Chapter 2) for pre-emptive replacements. We expect this to include showing how annual milestones will facilitate compliance with each of the obligations, including progress towards each of the relevant end-dates

We confirm that suppliers will also be required to provide supporting information on installer capacity as well as consumer engagement plans, including consideration of domestic consumers on the basis of their Personal Characteristics and/or vulnerable situations. Ofgem will be able to specify in a Direction any other information it may require for the deployment plan.

We confirm that, if suppliers have not set the annual milestones on the basis of a straight-line trajectory, they must provide reasons and justifications for not doing so.

As stated in the consultation, this is not a requirement necessarily to pursue a straight-line trajectory to the relevant end-dates; rather it is a requirement to justify deployment profiles against a straight line. We recognise that suppliers will have different commercial delivery profiles that reflect distinct portfolios, and that a straight-line pathway for achieving certain obligations may in some cases not always be the best approach. The Framework will give suppliers a degree of flexibility in determining the optimal path to achieve each of their obligations by the relevant deadlines. However, we consider that a guideline against which, for example, explanations and plans for consumer engagement and installer capacity can justify milestones, is necessary to help ensure activity is not unduly concentrated towards the end-dates as it would risk rendering those obligations unachievable. We consider a straight-line trajectory to be the most appropriate comparison to adopt in this case as it provides clarity and accountability, whilst supporting steady delivery for consumers.

Part (c): Board approval and publication

We confirm that deployment plans will require Board approval and be signed by a member of the Board.

We agree with respondents that Board approval would ensure appropriate oversight and accountability of deployment plans. We acknowledge a few concerns raised that there may be additional processes required in some limited cases by seeking Board approval but based on the majority of positive responses to this question, we expect these processes to be manageable. The route to obtaining Board approval will be determined by the energy supplier. We consider that requiring Board approval by relevant senior members responsible for smart metering operations is key to ensuring that the milestones have received adequate consideration; that plans are accurate and reasonable, and that progress is not unduly backloaded and is maintained at an appropriate level throughout the years of the Framework.

We also confirm that suppliers would be required to publish the annual milestones set out in the deployment plan no later than two working days after 1 January each year and publish their progress reports no later than two working days after submission to Ofgem, with the date for submission of progress reports to Ofgem to be determined by Ofgem.

We consider that continuing to publish milestones, and progress against those milestones, for the installation of smart meters, which going forward would include progress for annual milestones determined by suppliers for installation, replacement and smart meters operating in traditional mode, to be an effective tool for ensuring that supplier actions remain transparent and accessible to bill-paying customers and the public. It will also indicate that due care and responsibility is shown when suppliers set milestones, and that suppliers are held to an appropriate level of accountability for their obligations. The publication of targets, and progress against targets, is currently required under the previous 2022-2025 Targets Framework; therefore, it is not considered that this proposal would increase burdens.

Part (d): Alternative or additional design approaches that would reduce the risk of activities concentrated toward the end-dates

Our view is that the provisions set out in this Framework already sufficiently cover points raised. We agree that it is important that no consumer is left behind and that it is important to ensure that no region is left behind in the smart meter rollout; the requirement to complete the domestic smart meter rollout by the end of 2030 will help ensure this. See also Section 1 and our response to Questions 9 and 10.

We also note that the GSOP, introduced by Ofgem, to offer a first-time smart meter installation within six weeks of a customer request should significantly improve the waiting times for those consumers who ask their suppliers for a smart meter installation. This will apply to all consumers and is likely to be particularly beneficial to those in more remote geographical areas, those on flexible tariffs or prepayment meters, and vulnerable consumers.

As regards the request for publication of rollout coverage by region, we note domestic electricity smart meter coverage by local authority estimates are published as part of the smart metering statistics each year, using ElectraLink EMPRIS.[51]

[51] Smart meters in Great Britain, quarterly update March 2025 - GOV.UK

As part of their deployment plans, suppliers will be required to provide Ofgem with plans for consumer engagement, including taking account of the needs of their domestic customers on the basis of their Personal Characteristics or vulnerable situation.

We consider it is best for Ofgem to determine what information they may require in terms of geographical regions. Ofgem has the power to ask for additional information to the deployment plan via a Direction.

Ofgem intends to issue a consultation, which may include any further content requirements for deployment plans.

On the question of more frequent milestones, we consider that annual submission and milestones provide the right balance by enabling monitoring on an annual basis, whilst providing flexibility by allowing for resubmission in-year in response to, for example, exceptional events. Whilst we acknowledge that there could be value in more frequent milestones, this would increase the administrative burden on suppliers and Ofgem, whilst increasing the risk of compounding any underperformance.

Question 17

Summary of responses to Question 17

> *Do you agree that all energy suppliers, except those that supply gas or electricity, or both, to domestic sector customers via, in each case, fewer than 20,000 energy meter points, should be required to submit deployment plans? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.*

	Agree	Agree with Caveats	Neutral	Disagree with Caveats	Disagree	No Response
Respondents	16	1	3	2	9	33

Of a total of 64 respondents, 31 provided an answer to this question. A large number of those (54%, 17 of 31) agreed, or agreed with caveats, with the proposal that suppliers that supply gas or electricity, or both, to fewer than 20,000 domestic gas meter points and 20,000 domestic electricity meter points should be exempted from the requirement to submit deployment plans. Some respondents (35%, 11 of 31) disagreed or disagreed with caveats. The remaining three responses were neutral.

Respondents who supported the proposal considered the threshold to be proportionate, noting that the administrative burden associated with preparing deployment plans would be relatively greater on very small suppliers. These respondents viewed the exemption as a reasonable measure to mitigate undue burden on suppliers with limited resources.

Among those who disagreed with the proposal, some respondents argued that the requirement to submit deployment plans should apply to all suppliers, irrespective of size, to ensure consumers were not impacted and as a way to ensure completion of the rollout. Some argued that the exemption could confer a commercial market advantage for suppliers who are exempt and that it could risk adverse outcomes for consumers by sending an unintended message that small suppliers are not required to have considered smart metering in their business planning. One suggested lowering the threshold to those with 10,000 meter points to include more suppliers, on the basis that small suppliers were well-equipped for growth.

Some respondents argued that deployment plans should be made to be proportionate or scaled down rather than exempting smaller suppliers entirely, thereby maintaining accountability while reducing administrative burden.

Government response to Question 17

We confirm that all energy suppliers, except those that supply gas or electricity, or both, to domestic sector customers via, in each case, fewer than 20,000 energy meter points, will be required to submit deployment plans.

Requiring deployment plans from all applicable energy suppliers aims to ensure a consistent level of service for consumers across the country by being able to monitor and ensure accountability.

We were not provided with evidence from consultation respondents for there being proportionate additional benefits from including very small suppliers in the requirements to provide deployment plans, or to reducing the threshold. Due to the very small size of these suppliers (which are also limited in number), we consider that an exemption from providing deployment plans will help minimise regulatory burden whilst being unlikely to create an uneven playing field or confer a competitive advantage.

We further note that all suppliers, regardless of their size, will be required to meet their licence obligations, including those in this Framework, to take all reasonable steps to complete the domestic smart metering rollout by the end of 2030 and to ensure smart meters operate correctly, including by pre-emptively replacing smart metering assets ahead of the relevant service end-dates and by restoring smart services as soon as possible and within 90 days, when smart meters fall into traditional mode. We expect all suppliers to have plans in place to ensure they meet their obligations, regardless of whether they are required to submit deployment plans annually to Ofgem.

Section Four – Conclusions

DECISION 7: To proceed with the requirement for energy suppliers to provide Ofgem with annual deployment plans and to report against those deployment plans, with annual milestones setting out what activities they will undertake each year for the domestic

sector to meet their smart meter installation, pre-emptive replacement, and operational obligations.

DECISION 8: a) To proceed with annual milestones that are binding and without tolerances for new installations and pre-emptive replacements, and b) to proceed with a non-binding annual milestone for smart meters operating in traditional mode. Annual milestones are defined as a total number rather than a cumulative percentage and will be set separately for each fuel type under a single deployment plan.

DECISION 9: Energy suppliers will a) be required to submit updated deployment plans annually to Ofgem; and b) be able to request re-submission to Ofgem in-year. The definition of what constitutes an exceptional event would be for Ofgem to decide.

DECISION 10: The date from which the annual milestones for new installations and pre-emptive will be binding is 1 January 2027. Suppliers will be required to provide the first plan to Ofgem by 30 June 2026. Ofgem will be provided with a direction power to specify later implementation dates, if appropriate and if necessary.

DECISION 11:

a) Ofgem will be given the option to reject the plan, following which the supplier must resubmit the plan. Ofgem will have the option to provide guidance to suppliers on when it might reject the plan. The time in which Ofgem will have the option to reject the plan will be reduced from 40 days to 28 days.

b) Suppliers will be required to provide justifications for annual milestones, including, if suppliers have not set their milestones on a straight-line trajectory to the relevant end date, suppliers must provide their reasons for not doing so (i.e., provide justification for any numerical difference between the milestones set and the straight-line trajectory). Suppliers must also provide information such as workforce capacity and consumer engagement to support their justifications.

c) Each supplier's deployment plan must be i) approved by the suppliers Board and ii) the milestones as well as progress against those milestones must be published on the supplier's website no later than two working days after the plan is made effective on 1 January 2027 and annually thereafter. Approval and sign off will be required each time the plan is re-submitted.

DECISION 12: All energy suppliers, except those that supply gas or electricity, or both, to domestic sector customers via, in each case, fewer than 20,000 energy meter points, are required to submit deployment plans.

Section Five: Legal drafting

Question 18

Summary of responses to Question 18

> *Do you agree that the legal drafting (in Annex B) implements the policy intentions proposed in Section 1, Section 2 and Section 3 of this document? We welcome views from all stakeholders. Please provide rationale and evidence to support your answer.*

	Agree	Agree with Caveats	Neutral	Disagree with Caveats	Disagree	No Response
Respondents	10	6	11	0	7	30

Of a total of 64 respondents, 34 provided an answer to this question. A minority (47%, 16 of 34) agreed, or agreed with caveats, with the proposed legal drafting. A small number (22%, 7 of 34) disagreed, or disagreed with caveats, and the remaining 11 responses were neutral.

Respondents who supported the proposal generally found the legal drafting to be clear, appropriate, and aligned with the policy intent. Some highlighted that the drafting provided a sound legal basis for the proposed regulatory changes and appreciated the effort to ensure consistency with existing licence conditions.

A small number of respondents disagreed that the proposed legal drafting aligned with the policy intent. The concerns set out below were raised by both respondents who agreed with caveats, and those who disagreed.

Policy concerns

Some respondents felt that the drafting might impose obligations on energy suppliers that could be disproportionate or unclear, particularly in relation to how compliance would be assessed. Some noted that the drafting did not sufficiently account for operational challenges, such as reaching consumers in remote or complex premises, which could impact rollout feasibility.

Drafting concerns

Feedback was provided on the consistency of definitions with respect to obligations in the non-domestic sector, with one respondent querying the relevance of the current definition of Designated Premises (based on electricity profile classes) once meters have been migrated for Market-Wide Half-Hourly Settlement (MHHS). Another respondent noted inconsistencies in how advanced meters are referenced across the licence conditions.

A few respondents highlighted that ambiguity around the interpretation of the 90-day remediation period for restoring smart functionality could be viewed as a cut-off point rather than an ongoing obligation, and another respondent proposed the amendment of SLC 49.27 to allow Distribution Network Operators (DNOs) to trigger supplier obligations when meters revert to traditional mode, ensuring the timely restoration of smart functionality. Finally, one respondent requested greater transparency on service end-dates, including maintaining a version-controlled register, and alignment of technical terminology across licence conditions to avoid confusion during implementation.

Government response to Question 18

We have considered all responses received in finalising the legal drafting that implements the policy decisions set out in Section One, Two, Three and Four of this document.

The decisions that require modifications to licence conditions compared to those stated in the original consultation are:

- The time in which Ofgem will have the option to reject a deployment plan will be reduced from 40 days to 28 days.
- Requiring the DCC to set out in its Communications Availability Statement, for cohorts where the DCC is seeking to extend the end-date, the date provided in the 'Joint statement on the sunsetting of 2G and 3G networks and public ambition for Open RAN rollout as part of the Telecoms Supply Chain Diversification Strategy'[52], which is the end of 2033.
- Strengthening the obligation on the DCC to make updates to the Communications Availability Statement 'as soon as reasonably practicable' once any changes to service end-dates are confirmed.

Additionally, we have carefully considered all stakeholder feedback on the proposed licence condition changes, and where appropriate we have made a number of clarificatory edits to improve consistency, coherence and readability, without changing the substance or scope of the policy.[53] In broad terms, the final drafting harmonises references and defined terms across the text to ensure a single, consistent usage, including technical definitions and non-domestic categories. These full changes are detailed in Annex C, and will be laid in Parliament shortly.

We have ensured coherence with the wider supply licence framework and regulatory oversight through engagement with Ofgem.

To note, responses relating to policy have been discussed in the relevant chapters.

[52] A joint statement on the sunsetting of 2G and 3G networks and public ambition for Open RAN rollout as part of the Telecoms Supply Chain Diversification Strategy - GOV.UK

[53] Regarding the definition of designated premises for the purpose of electricity supply (e.g. non-domestic obligations) and how this interacts with MHHS, this is addressed in Section Three of the government's recent consultation on the non-domestic smart meter rollout post-2025, see: Non-domestic smart meter rollout post-2025 - GOV.UK.

Section Five - Conclusion

DECISION 13: To proceed with minor drafting amendments, as detailed in Annex C.

Annexes

Annex A: List of respondents

Annex B: Final Impact Assessment

Annex C: Licence Condition and DCC Licence Changes

Annex A: List of respondents

Organisation Type	Organisations
Energy Suppliers	• British Gas (Centrica) • E.ON Energy • EDF Energy • Good Energy • Octopus Energy • OVO Energy • Scottish Power • So Energy • Utilita • Corona Energy • DRAX Group • Engie • SSE Energy Solutions
Trade Bodies	• BEAMA • Blackburn and District Trades Union Council • Community of Meter Asset Providers • Energy UK • Industrial and Commercial Shippers and Suppliers • Scottish Federation of Housing Associations
DNOs and energy transporters	• National Gas Transmission • Northern Powergrid Ltd
Meter Operator Providers (MOP) and Map Asset Providers (MAP)	• Horizon Energy Infrastructure Ltd, Smart Meter Assets Ltd, Smart Metering Systems Ltd • Macquarie Energy Leasing • Northern Powergrid Metering Ltd • Calisen
Meter/IHD Manufacturers	• Aclara Meters UK (Hubbell Inc.) • Chameleon • EDMI

	• Geo Together
	• Landis+Gyr
Delivery Partners	• Alt HAN Co
	• Energy Ombudsman
	• Smart DCC
	• Smart Energy Company Code
Consumer Groups	• Citizens Advice
	• Consumer Scotland
	• MoneySavingExpert
	• National Energy Action
Members of the public	• 15 responses by individuals
Other	• Adult Child Health and Environmental Support
	• Arnisdale & Loch Hourn Community Association
	• Centre for Sustainable Energy
	• Electrosensitivity UK
	• EM Radiation Research Trust
	• SAVE US NOW
	• Scope
	• Kentisbury Mill Holiday Letting
	• Scottish Government
	• Unite the Union

This publication is available from: https://www.gov.uk/government/consultations/smart-metering-policy-framework-post-2025

Any enquiries regarding this publication should be sent to us at: smartmetering@energysecurity.gov.uk

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