RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0267 SMART METER INSTALLATION SURVEYS - MICROBUSINESS REQUIREMENTS

On 20 February 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0267 Smart Meter Installation Surveys - Microbusiness requirements.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

DOCUMENT VERSION	V1.0
RESPONSE TYPE	Non-Confidential
DATE ISSUED	16 March 2026
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	20 February 2026
RESPONSE DEADLINE	13 March 2026

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	Yes, we agree with the proposed solution.	Thank you for your comments.
Anonymous (Energy Supplier)	We agree that there is a requirement for a threshold to be added but feel that the baseline is too low. Thousands of meters will be installed through the SMART programme and the numbers chosen is a very small percentage of what will be installed. A higher requirement would give greater confidence that the survey results would be more reflective of the customer experience. What is the expectation for a supplier whose installation programme is around the baseline figure if the number of installs in unexpectedly hit? If a Supplier currently has 800 Microbusiness sites and they do not contract with a survey organisation but then late in the year take on more Microbusiness sites which they install on to go past the 1000 mark what would be the expectations? Would they then contact with an organisation and ask them to survey customers who may have had the install completed nearly a year ago? Also there is a risk to suppliers who procure a organisation to complete the surveys but then do not install over the threshold due to known industry issue of roll out programmes. This would outlay an unnecessary cost for suppliers.	Thank you for your comments. The Code Manager has selected 1,000 installs as the threshold based on data provided earlier in this Change Proposal, which evidenced that the number of survey responses received would drop by <5%, to minimise the impact to DESNZ. It will be for each Energy Supplier to choose how they meet the obligation as set out for 1,000 to 5,000 installs: reasonable endeavours should be used to gather as many survey returns as possible. The Code Manager would assume if an Energy Supplier was planning between 1,000 and 5,000 installations per annum, they would be conducting surveys throughout the year. While there would be no requirement to submit responses if less than 1,000 installs

		were then done, there is nothing to say the responses could not be submitted. While this is a risk, it is no different to the current obligations that require all Energy Suppliers to procure a third party survey organisation, even if they are only conducting one install.
SEFE Energy (Energy Supplier)	We agree with the proposed solution	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Whilst we feel the survey this late in the Smart rollout no longer has the impact it once did, the proposed change will have no impact on our survey requirements.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes	Thank you for your comments.

Question 2:	Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	Yes, we agree with the proposed implementation approach.	Thank you for your comments.
Anonymous (Energy Supplier)	Yes we agree with this approach.	Thank you for your comments.
SEFE Energy (Energy Supplier)	We agree with the implementation approach	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes	Thank you for your comments.

Question 3:	Do you agree with the Code Manager's assessment of the costs and benefits for this change, including the impact to the Rec objectives?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	Yes, we agree with the costs and benefits identified. At this stage of the rollout, Drax typically installs a very small number of Smart meters at microbusinesses premises each year. Not all of these consumers respond to Smart Meter Installation Surveys, resulting in a data sample that is unlikely to be meaningful or useful. We would see an immediate benefit from this change, as procuring an Independent Smart Meter Installation Survey Organisation incurs significant costs, for negligible value. We agree with the Code Manager's assessment that, as first meter installations continue to decrease over time, more suppliers will benefit from this change resulting in greater cost savings across industry.	Thank you for your comments.
Anonymous (Energy Supplier)	As mention in question 1 there is a risk to suppliers who procure a organisation to complete the surveys but then do not install over the threshold due to known industry issue of roll out programmes. This would outlay an unnecessary cost for suppliers.	Thank you for your comments. Please see the Code Manager response to Q1, particularly noting that these Energy Suppliers already face this cost today even if they only plan to complete one installation.
SEFE Energy (Energy Supplier)	We agree with the Code Manager that this would have a positive impact on the REC Objectives	Thank you for your comments.

SSE Energy Supply (Energy Supplier)	We do not disagree with the cost and benefits as outlined, as they will have no impact on SSE.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes	Thank you for your comments.

Question 4:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to determination by the Authority following a recommendation by the REC Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	Yes, we agree this is the appropriate change path.	Thank you for your comments.
Anonymous (Energy Supplier)	Yes we agree	Thank you for your comments.
SEFE Energy (Energy Supplier)	We agree with the Code Managers assessment of the Change Path.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We have no issue with this change going to the Authority.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes	Thank you for your comments.

Question 5:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 26 June 2026 (or the next appropriate release following Authority decision)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	Yes, we see no reason why implementation should be delayed following Authority decision.	Thank you for your comments.
Anonymous (Energy Supplier)	Yes we agree	Thank you for your comments.
SEFE Energy (Energy Supplier)	We would like to see this implemented ASAP.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes	Thank you for your comments.

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	We fully support the proposed solution. There is currently no requirement for suppliers planning fewer than 5000 Smart meter installations, within a calendar year, at domestic premises to survey consumers for REC compliance purposes. Conversely, there is no minimum threshold in place for microbusiness installations, meaning that non-domestic suppliers are required to procure a suitably qualified, Independent Smart Meter Installation Survey Organisation to survey what might be a very small number of consumers. The proposed solution will address both this misalignment and the disproportionate costs being incurred by suppliers carrying out small numbers of installations at microbusiness premises.	Thank you for your comments.
Anonymous (Energy Supplier)	No we do not	n/a
SEFE Energy (Energy Supplier)	n/a	n/a
SSE Energy Supply (Energy Supplier)	No.	n/a
ENGIE (Energy Supplier)	No, comments were previously provided in the RFI.	n/a