Department for Energy Security & Net Zero

SMART METERING IMPLEMENTATION PROGRAMME

Smart Metering product issue and incident resolution guidance

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1. Background

1.1 Purpose

The purpose of this document is to describe the product and procedural incident resolution process for the Smart Metering Implementation Programme (SMIP). This is intended to support the safe and effective roll out of smart meters and ensure a positive consumer experience.

The document aims to:

- Act as a common point of reference to coordinate the activity of programme participants in the event of an incident.
- Ensure that significant consumer-impacting and multiparty incidents are notified promptly to the Department for Energy Security and Net Zero (DESNZ) in its role as programme sponsor, so that it can ensure that parties are pre-empting further issues and/or resolving them quickly and consistently to avoid consumer detriment.
- Provide a mechanism to capture and share anonymised lessons through DESNZ so that stakeholders can prevent future incidents and, should they occur, improve their resolution management.

This process is intended as **advisory guidance** and does not create any mandatory obligations. It is designed to support consistent coordination across parties, but does not override or alter existing legal, regulatory, or contractual duties, all of which continue to take precedence. When reporting product-related issues, parties should continue to follow the established frameworks set out in the Code of Practice PAS 7100 and the Product Safety Risk Assessment Methodology (PRISM).

1.2 Context

Given the scale of change and the use of new technology and procedures to roll out smart meters, it is inevitable that issues will occur. Resolution of these incidents will be critical to ensure that both new installations and the ongoing operation of deployed smart meters continues to be safe and effective, while also supporting a positive consumer experience.

Incidents may relate to product failures or procedural failures that arise from the provision of smart metering related technology or services. Safety related product issues are subject to existing legislation and agreed processes. Therefore this guidance should supplement those already in place.

1.3 Nature of issues to which this guidance applies/does not apply

This guidance is aimed at significant consumer-affecting issues affecting one or more parties in relation to the rollout of smart meters as part of the Smart Metering Implementation Programme.

Operational issues with smart metering that are company specific, and which do not impact consumers, are not in scope of this guidance. Similarly, this guidance does not apply to individual or localised issues where a wider impact is not anticipated.

In-scope incidents are likely to relate to products being deployed at consumer premises by one or more parties, or the processes being widely used to install those products. While organisations are free to take their own approach it should be recognised that variance or inconsistency in consumer communications can cause confusion.

Security specific issues/incidents are excluded from this guidance. This is covered in the Smart Energy Code (SEC) which places obligations on the DCC and DCC Users to notify the Security Sub-Committee of any vulnerability or incident that occurs in, or causes a material adverse effect on, the security of hardware, software, firmware, or a Device.

Where processes are not already in place e.g., PAS 7100 or PRISM, then this guidance should be followed (subject to any contractual obligations between energy suppliers, asset owners, installers, and product manufacturers).

2. Process

In this section the high-level view of the process is described. There is also a detailed description of the individual process considerations together with a diagram identifying the various stages.

2.1 High Level Process Description

There are four principal parts to the process:

(A) **Initial Identification of the issue or incident and informing parties**. Notification is given to DESNZ who make an initial assessment as to whether the criteria under 1.3 nature of issues to which this guidance applies/does not apply is met. DESNZ confirms and impacted parties consult to develop communication strategies and discuss and agree on media and customer handling lines to ensure clear and consistent communications.

Parties include but are not limited to:

- Government organisations: Ofgem, Health Safety Executive (HSE), Office for Product Safety and Standards (OPSS).
- Safety organisations: Gas Safe Register, Electrical Safety First.
- Trade association: Energy Networks Association (ENA), Energy UK (EUK), Energy & Utilities Alliance (EUA), British Electrotechnical and Allied Manufacturers' Association (BEAMA), the Association of Meter Operators (AMO) and UK Metering Forum (UKMF).
- Consumer groups: Citizens Advice, Consumer Scotland, and National Energy Action.
- Other organisations: Smart Energy GB. *(Steps 1 and 2).*

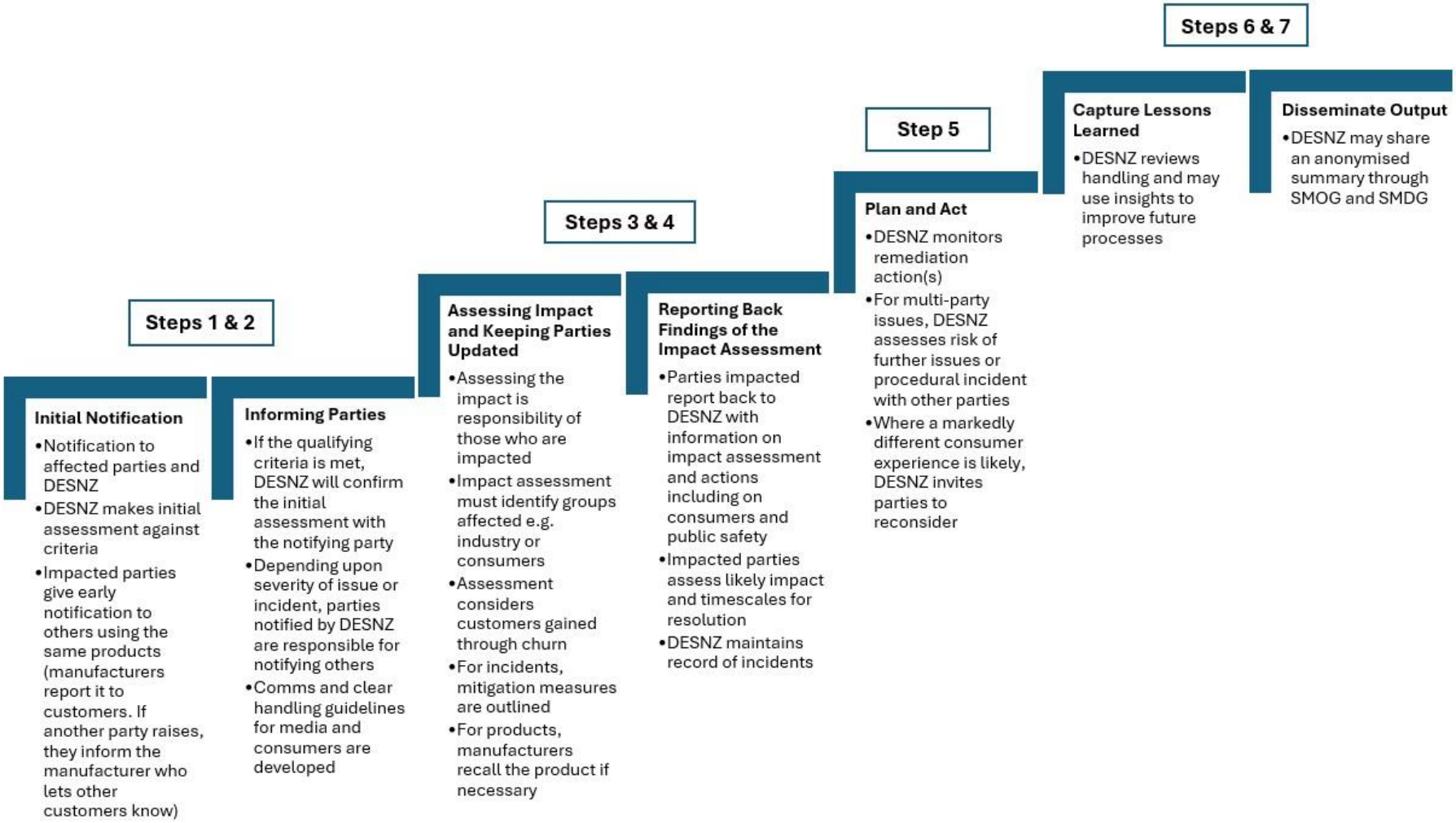
(B) **Assessing impact, keeping parties updated and reporting back findings of impact assessment.** Impact is assessed including severity, consumer safety and mitigation measures and is reported back to DESNZ and others. *(Steps 3 and 4).*

(C) **Plan and act.** Remediation of the issue or procedural incident by the impacted parties, with progress tracked by DESNZ *(Steps 5).*

(D) **Capturing lessons learned and disseminating output** by DESNZ on an anonymous basis *(Steps 6 and 7).*

The process is set out below in Figure 1.

Figure 1.


Steps 1 & 2
Initial Notification
•Notification to affected parties and DESNZ
•DESNZ makes initial assessment against criteria
•Impacted parties give early notification to others using the same products (manufacturers report it to customers. If another party raises, they inform the manufacturer who lets other customers know)
Informing Parties
•If the qualifying criteria is met, DESNZ will confirm the initial assessment with the notifying party
•Depending upon severity of issue or incident, parties notified by DESNZ are responsible for notifying others
•Comms and clear handling guidelines for media and consumers are developed
Steps 3 & 4
Assessing Impact and Keeping Parties Updated
•Assessing the impact is responsibility of those who are impacted
•Impact assessment must identify groups affected e.g. industry or consumers
•Assessment considers customers gained through churn
•For incidents, mitigation measures are outlined
•For products, manufacturers recall the product if necessary
Reporting Back Findings of the Impact Assessment
•Parties impacted report back to DESNZ with information on impact assessment and actions including on consumers and public safety
•Impacted parties assess likely impact and timescales for resolution
•DESNZ maintains record of incidents
Step 5
Plan and Act
•DESNZ monitors remediation action(s)
•For multi-party issues, DESNZ assesses risk of further issues or procedural incident with other parties
•Where a markedly different consumer experience is likely, DESNZ invites parties to reconsider
Steps 6 & 7
Capture Lessons Learned
•DESNZ reviews handling and may use insights to improve future processes
Disseminate Output
•DESNZ may share an anonymised summary through SMOG and SMDG

2.2 Detailed Process Description

The following sections provide an overview of how each stage should operate in practice:

Step 1 – Initial Notification

The first step in the process involves notification of a product or process issue to affected parties and separately to DESNZ.

Notification can come from various sources e.g. UKMF, AMO, energy suppliers, product manufacturers, or Meter Asset Providers (MAPs). It can also be from an organisation that has become aware of a deficiency in the products or the recommended installation/operation guidance.

Notification to DESNZ will be given to the SMIP Senior Responsible Owner, the SMIP Programme Director, the Head of Operations Stewardship & Domestic Delivery, or delegated officials, and can be from any impacted party (normally the product manufacturer, energy supplier or MAP).

DESNZ will make an initial assessment of the product or process issue. If the issue is deemed not to meet the criteria (outlined in Section 1.3), DESNZ will confirm with the notifying party. In the case of safety incidents with products or procedural incidents, impacted parties are required to identify and notify other organisations that use the same products as early as possible.

If a manufacturer is raising an issue, then they will report to all of their customers. If an energy supplier or other party raises an issue, then they would inform the manufacturer who then informs their other customers.

DESNZ will maintain confidentiality where any party shares information ahead of, and during, the investigation of a potential issue or incident, normally until the manufacturer (in case of product issue) or energy supplier (in case of incident) has had reasonable time to investigate. Where practicable, DESNZ will seek to engage with the relevant manufacturer(s) and supplier(s) in advance of any wider information sharing to ensure accuracy and proportionality. This will not prevent DESNZ from sharing information where necessary to protect consumers, meet wider public interest or regulatory requirements.

Step 2 – Informing Parties

If the qualifying criteria are met:

1. DESNZ will confirm with the notifying party the initial assessment of the issue or procedural incident, and that it represents a significant consumer issue impacting one or more parties.

2. Dependent on the severity of the issue or procedural incident, the parties informed by DESNZ are responsible for further notifying any others as appropriate (defined in 2.1), of the potential issue or incident.

Discussion between DESNZ and relevant parties may be required to develop communication strategies and agree clear guidelines for handling enquiries from the media and consumers at an early stage, even when the full extent of the issue may not yet be known.

It is essential to use appropriate language in consumer-facing messages to prevent causing excessive concern or confusion. Impacted parties should consider coordinating on consumer messaging and media handling lines to ensure element of consistency to messaging.

Step 3 - Assessing Impact and Keeping Parties Updated

Assessing the impact of the issue is the responsibility of those who are impacted. Any assessment must identity which groups have been affected, whether industry stakeholders or consumers, and determine the severity of the impact. The assessment must consider matters such as impacts on consumer safety or supply chain disruption.

In assessing impacted parties, energy suppliers should identify parties who may have inherited affected consumers from them and inform those parties. They should indicate the extent of previous communication with potentially affected consumers so that the inheriting party can ensure that the consumer journey is effectively managed.

Where the concern is an incident (rather than a product issue), the assessment must also outline the measures that will be taken to mitigate and prevent similar incidents in the future.

In case of a product issue, if a product notice or recall is deemed to be necessary, responsibility for this will fall to the manufacturer of the product. Full co-operation is expected from all parties.

Step 4 – Reporting Back Findings of the Impact Assessment

Those parties who are impacted will report back to DESNZ by providing information on their impact assessment and likely course of action. It will contain consideration of implications for **consumers and public safety,** including on the assessment process and the conclusions reached. Additionally, it will also cover the corrective actions implemented, and the measures taken to assess and mitigate against future risks.

Impacted parties will assess the likely impact and the potential timescales for resolution. DESNZ will maintain an internal record of incidents and steps taken towards their resolution to help identify good practice.

Step 5 – Plan and Act

Remediation of the issue is the responsibility of those impacted.

DESNZ has no role in determining the best course of action or commercial liabilities that may or may not arise between parties, but it has an interest in ensuring a proportionate and timely resolution of the issue. Therefore, DESNZ will continue to monitor the remediation action(s) to ensure it is given sufficient attention and priority in relation to the issue's impact and scale.

In the case of multi-party issues, DESNZ will assess with other convened parties and identify where different actions from multiple impacted parties could risk further issues or procedural incidents.

Where there is likely to be a markedly different consumer experience in terms of the speed and nature of resolution due to the actions of multiple impacted parties, DESNZ will invite impacted parties to reconsider their approaches, but not direct a party to take a specific course of action.

Step 6 – Capture Lessons Learned

DESNZ will review how the issue was handled to identify themes, weaknesses, and good practice. While not involved in resolving issues, DESNZ may use these insights to help improve future processes and reduce repeat incidents.

Step 7 – Disseminate Output

DESNZ may share a summary of any learning on an anonymised basis where appropriate, to assist in the potential prevention of future issues or incidents and refinement of remediation procedures. This information will be shared through the Smart Meters Operations Group and the Health and Safety Subgroup.