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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0267 SMART METER INSTALLATION SURVEYS - MICROBUSINESS REQUIREMENTS

On 12 December 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0267 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.

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	21 January 2026
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	12 December 2025
RESPONSE DEADLINE	16 January 2026

Question 1:	Do you have any comments on the proposed solution?	
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 at domestic premises, within a calendar year, 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, at considerable cost, to survey what might be a very small number of customers. 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.
British Gas (Energy Supplier)	We are supportive of the proposed solution and welcome the amendment to the previous solution. Ensuring suppliers use an independent sorbet organisation is crucial to ensuring that consistent standards and insight are gathered from customers to enable meaningful output, therefore driving standards for customers across the market.	Thank you for your comments.

E.ON Next (Energy Supplier)	We agree with the proposal to introduce a minimum threshold, under which suppliers planning fewer than 1000 smart meter installations would not be required to conduct the smart installation survey.	Thank you for your comments.
ENGIE (Energy Supplier)	We agree with the proposed solution.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE agrees with the limit of 1000 non-domestic installs before carrying out the Smart Installation Survey.	Thank you for your comments.

Question 2:	Do you agree with the reasoning for descoping removing the obligation to use an independent Smart Meter Installation Survey Organisation?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	We recognise that removing the obligation to use an independent Smart Meter Installation Survey Organisation could lead to a difference in quality, though we note quality may also vary from one independent organisation to another.	Thank you for your comments.
British Gas (Energy Supplier)	We agree with the reasoning set out within the solution document. The use of an independent survey organisation is important in ensuring consistent standards are achieved across the market, with costs reflective of the specialist methodologies and knowledge used by survey organisations. As stated within our response to the previous version of this solution, our key concern in removing the requirement for suppliers is the risk of inequality across the industry in terms of the standards achieved. Survey organisations operate to a specified standard, using techniques and methods that ensure high quality customer feedback. Allowing suppliers to do this directly may drive down standards and risk the intended purpose of the surveys from being met.	Thank you for your comments.
E.ON Next (Energy Supplier)	We are not clear why utilisation of a third-party provider promotes consistency in quality more than a supplier carrying out the surveys	Thank you for your comments.

	directly. Suppliers are not obliged to use the same provider so variances will still exist.	
ENGIE (Energy Supplier)	Yes, we agree that it is better to have a consistent approach.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE feels there would have been no issue with suppliers having responsibility for the Smart Installation Survey and this would have reduced costs. However, this will result in no change to current practices	Thank you for your comments.

Question 3:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	Yes, we agree	Thank you for your comments.
British Gas (Energy Supplier)	We agree that the proposed solution does address the problem statement. For our organisation specifically, this change would have no impact. However, removing the obligation for very small suppliers (installing fewer than 1,000 first smart meters at microbusiness premises) seems proportionate to the level of cost, useable insight this customer base would generate and the overall impact to the wider market. As previously noted, we welcome the inclusion of the requirement to use an independent survey organisation, to ensure consistent standards across suppliers.	Thank you for your comments.
E.ON Next (Energy Supplier)	We have no comments on this as we are not impacted.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes. A 1,000 installation limit for non-domestic is proportionate to the 5,000 limit for domestic suppliers.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	With predominantly more tricky Smart installs left to complete, SSE feels the Smart Installation Survey no longer meets its intended purpose. The survey has provided useful feedback over the years, but	Thank you for your comments.

	with the introduction of GS for Smart installs, it is no longer relevant, and so if the problem was around costings of the survey, it should be phased out completely.	Removing the Smart Meter Installation Survey is not within the scope of this Change Proposal, as it is owned by DESNZ who have confirmed under a different REC CP (I0189) they require it to remain in place for reporting.

Question 4:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	No. We believe the proposed solution is the best option to address the problem statement.	Thank you for your comments.
British Gas (Energy Supplier)	No comment.	Thank you for your comments.
E.ON Next (Energy Supplier)	No we are not aware of any alternative solutions that would better meet the needs of the problem statement	Thank you for your comments.
ENGIE (Energy Supplier)	No. We agree with the solution proposed.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	See answer to Q3	Thank you for your comments.

Question 5:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	Yes.	Thank you for your comments.
British Gas (Energy Supplier)	Based on the solution proposed, impacted to scenarios are minimal and we do not foresee this change impacting other processes.	Thank you for your comments.
E.ON Next (Energy Supplier)	How would REC identify if a supplier plans to do fewer than 1,000 smart meter installations but then does carry out more installations than this? When would they expected to start surveys? There is a need for robust controls to prevent this occurring each year.	Thank you for your comments. This would be picked up under the CoMCoP audit performed by the Metering Scheme Auditor, which asks Energy Suppliers to provide evidence that the required Surveys for that calendar year were carried out, contained the required data in the correct format and sent within the required timescales. The Code Manager has made adjustments to the legal text so there a requirement for Non-Domestic Suppliers to report to the Code Manager is they are planning more than 1,000 installations, in line with current Domestic obligations.

ENGIE (Energy Supplier)	Yes.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We do not know of any scenarios that are missing.	Thank you for your comments.

Question 6:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	The draft legal text accurately reflects the proposed change.	Thank you for your comments.
British Gas (Energy Supplier)	No comment.	Thank you for your comments.
E.ON Next (Energy Supplier)	As per our response to Q5, what governance arrangements are in place to ensure that suppliers do not exploit the arrangement?	Thank you for your comments. Please see the Code Manager response to question 5.
ENGIE (Energy Supplier)	We have not formally reviewed the legal text.	Thank you for your confirmation.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.

Question 7:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	We do not require any lead time and would support implementation as soon as practicable.	Thank you for your comments.
British Gas (Energy Supplier)	For our organisation specifically, this change would have no impact as we already use an independent survey organisation to carry out this activity.	Thank you for your comments.
E.ON Next (Energy Supplier)	This is not applicable to EON	Thank you for your comments.
ENGIE (Energy Supplier)	We could implement this solution with zero lead time.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	This is a continuation of existing processes and contracts	Thank you for your comments.

Question 8:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	No.	Thank you for your comments.
British Gas (Energy Supplier)	No comment.	Thank you for your comments.
E.ON Next (Energy Supplier)	This is not applicable to EON	Thank you for your comments.
ENGIE (Energy Supplier)	No.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	For SSE there are no constraints on implementation, but other suppliers may be impacted by contracts with third party survey providers.	Thank you for your comments.

Question 9:	Do you foresee any risks to your qualification or migration plans to be delivered as part of MHHS implementation caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	No.	Thank you for your comments.
British Gas (Energy Supplier)	For our organisation specifically, this change would have no impact as we already use an independent survey organisation to carry out this activity.	Thank you for your comments.
E.ON Next (Energy Supplier)	This is not applicable to EON	Thank you for your comments.
ENGIE (Energy Supplier)	No.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.

Question 10:	Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: A) Nil; B) Up to £9,999; C) Between £10,000 and £49,999; D) Between £50,000 and £99,999; or E) more than £100,000.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	A) Nil	Thank you for your comments.
British Gas (Energy Supplier)	For our organisation specifically, this change would have no impact as we already use an independent survey organisation to carry out this activity.	Thank you for your comments.
E.ON Next (Energy Supplier)	This is not applicable to EON – No costs	Thank you for your comments.
ENGIE (Energy Supplier)	A	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	A) Nil;	Thank you for your comments.

Question 11:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	n/a	n/a
British Gas (Energy Supplier)	For our organisation specifically, this change would have no additional benefits as we already use an independent survey organisation to carry out this activity.	Thank you for your comments.
E.ON Next (Energy Supplier)	Our organisation would not benefit form these proposals	Thank you for your comments.
ENGIE (Energy Supplier)	The proposed solution will benefit our business (which is non-domestic) by creating a level playing field with the domestic market, and ensuring that we do not have to keep contracts in place to survey a very small number of Smart installations. We will also make a small saving on the costs of conducting surveys in any year where we fall below the threshold.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	This change has no benefits to SSE.	Thank you for your comments.

Question 12:	Taking into consideration both the costs and the benefits seen by your organisation, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	Yes.	Thank you for your comments.
British Gas (Energy Supplier)	For our organisation specifically, this change would have no impact. However, removing the obligation for very small suppliers (installing fewer than 1,000 first smart meters at microbusiness premises) seems proportionate to the level of cost, useable insight this customer base would generate and the overall impact to the wider market. As previously noted, we welcome the inclusion of the requirement to use an independent survey organisation, to ensure consistent standards across suppliers. Therefore, we are supportive of this change being made.	Thank you for your comments.
E.ON Next (Energy Supplier)	Yes, we consider the change should be made	Thank you for your comments.
ENGIE (Energy Supplier)	Yes.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Please see our answer to Q3. We do not think this change has the benefits expected to the industry and consumers.	Thank you for your comments.

Question 13:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions (Energy Supplier)	Not all customers will respond to surveys, which means that the data sample from suppliers installing very small numbers of meters is unlikely to be useful or meaningful. Yet these suppliers currently incur considerable costs, which are ultimately recovered from the wider customer base. The survey requirements have been in place since the start of the Smart meter rollout and the requirements are based on install rates at that time. We believe the proposed solution is appropriate for the current phase of the rollout.	Thank you for your comments.
British Gas (Energy Supplier)	We have no additional comments related to this change.	n/a
E.ON Next (Energy Supplier)	Changes are required to the survey questions as they are no longer fit for purpose. This has been discussed as part of I0189 Voice of the Customer working groups. Whilst we acknowledge that this will not be addressed by I0267, we are keen to understand whether this could be separated off from I0189 and progressed separately to expedite this issue.	Thank you for your comments. If any Party believes there is a need for the Smart Meter Installation Survey questions to be reviewed more urgently, the Code Manager would ask them to submit a new Issue/Change Proposal to be reviewed.
ENGIE (Energy Supplier)	No.	n/a
SSE Energy Supply (Energy Supplier)	No.	n/a