

9 May 2025

By email to smartmetering@ofgem.gov.uk

Smart Meter Guaranteed Standards: Supplier Guaranteed Standards of Performance

About us

Consumer Scotland is the statutory body for consumers in Scotland. Established by the Consumer Scotland Act 2020, we are accountable to the Scottish Parliament. The Act defines consumers as individuals and small businesses that purchase, use or receive in Scotland goods or services supplied by a business, profession, not for profit enterprise, or public body.

Our purpose is to improve outcomes for current and future consumers, and our strategic objectives are:

- to enhance understanding and awareness of consumer issues by strengthening the evidence base
- to serve the needs and aspirations of current and future consumers by inspiring and influencing the public, private and third sectors
- to enable the active participation of consumers in a fairer economy by improving access to information and support

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Consumer Scotland uses data, research and analysis to inform our work on the key issues facing consumers in Scotland. In conjunction with that evidence base we seek a consumer perspective through the application of the consumer principles of access, choice, safety, information, fairness, representation, sustainability and redress.

Consumer principles

If relevant, use this space to explain which consumer principles are engaged by the consultation response e.g.

The Consumer Principles are a set of principles developed by consumer organisations in the UK and overseas.

Consumer Scotland uses the Consumer Principles as a framework through which to analyse the evidence on markets and related issues from a consumer perspective.

The Consumer Principles are:

- Access: Can people get the goods or services they need or want?
- Choice: Is there any?
- Safety: Are the goods or services dangerous to health or welfare?
- Information: Is it available, accurate and useful?
- Fairness: Are some or all consumers unfairly discriminated against?
- Representation: Do consumers have a say in how goods or services are provided?
- Redress: If things go wrong, is there a system for making things right?
- Sustainability: Are consumers enabled to make sustainable choices?

We have identified **access** and **redress** as being particularly relevant to the consultation proposal that we are responding to.

Our response

We broadly welcome the Ofgem’s proposals to introduce new Guaranteed Standards of Performance for specific elements of the smart meter consumer experience.

Smart meters can provide consumers with a better understanding of their current energy usage and, when working properly, should minimise consumer price shocks by removing issues with estimated meter readings and back billing.

Smart meters are also increasingly seen as the key to future innovations in the retail market. Collected smart data is being used in an increasing number of innovative tariffs and novel technologies, providing consumers with more choice and possible savings. Smart meters are also often a prerequisite for the installation of low-carbon technology, such as solar PV, batteries, and heat pumps, and therefore an important tool for governments to achieve their net zero and climate change goals.

However, despite the potential consumer benefits, and the national smart meter rollout being underway for over a decade now, some areas of GB have considerably lower levels of working smart meters than other parts of the country.

The latest available Department for Energy Security and Net Zero (DESNZ) geographic analysis highlights that installation of smart meters in Scotland is significantly lagging behind the rest of Great Britain, with the proportion of installed domestic electricity smart meters in Scotland being only 51%, compared to the UK average of 63%¹.

The analysis illustrates that while there is an issue across the whole of Scotland, the lowest rates of installed domestic electricity smart meters are particularly concentrated in rural and remote island areas. This means that consumers in these rural areas in Scotland miss out on the same level of consumer choice around energy products and tariffs, and associated savings, compared to consumers elsewhere in Great Britain. This lack of choice in the market and missing out on budgeting benefits that come with an In-Home Display (IHD) may also compound the affordability and higher cost of living that can come with living in rural and remote Scottish areas².

While supplier performance is not the whole story for the poor level of smart meter installation in Scotland, suppliers are key to improving the smart meter rollout with their responsibilities for installing and maintaining smart meters. However, consumers have reported being unable to obtain an engineer appointment for the installation of a smart meter in a timely manner. Consumers also report operational issues with their smart meter, including issues with smart meter usage data not being received by a supplier, or supplier’s own prepayment meter top-up mechanism (such as through an app) not working³. The

¹ DESNZ (2024) [Smart Meters in Great Britain, Quarterly Update March 2024](#): Q1 2024 Smart Meter Statistics Table, Table 7

² Scottish Government (2023) [Rural Scotland Data Dashboard: 3.2 Cost of Living](#)

³ Changeworks (2023) A Perfect Storm: Fuel Poverty in Rural Scotland, pp. 45-47.

potential breadth of operational issues is illustrated in the latest available DESNZ analysis, which highlights that around 10% of installed smart meters are operating in traditional mode⁴.

We also encourage Ofgem, Department for Energy Security and Net Zero (DESNZ), and other energy industry stakeholders, to review how the Smart Meter programme is working with the current legal obligation on suppliers to offer all consumers a smart meter due to expire at the end of 2025. The data on low rollout in rural and remote areas of Scotland highlights the need for a developed plan on the future of smart meter installations that improves targeting of consumers in less densely populated areas. Ofgem should work with the DESNZ to ensure that current and any future national rollout targets for suppliers improves incentives to use resources to target these consumers.

Further, some operational issues do not lie with, or solely lie with, the energy supplier, but also involve the responsibilities of the Data Communications Company (DCC), the body responsible for the telecommunications network that connects smart meters to suppliers. There is currently no existing or proposed compensation scheme for consumers whose smart meter's fault is under the responsibility of the DCC. This leaves an important "accountability gap", where consumers suffer from faulty meters. Ofgem and DESNZ should consider addressing this gap, potentially adopting supplier cost-recovery measures for network faults used in other utilities in the UK.

Finally, we broadly support guaranteed standards being extended to smart meter installations for non-domestic consumers as well. As noted in the consultation, small and medium sized businesses can face similar challenges to domestic consumers with faulty smart meters. It is also important that ostensibly domestic households on non-domestic tariffs (for example, in the case of farm holdings or some bar or pubs with attached domestic premises) should also be able to benefit from extended consumer protections for smart metering.

Clarification of the 2015 Regulations

Question 1. Do you agree the 2015 Regulations should be updated to reflect the current metering landscape and explicitly mention smart meters?

Consumer Scotland supports the 2015 Regulations being updated to reflect the current metering landscape, and to support improving the rollout of smart meters in Scotland.

Smart meters enable a range of benefits for consumers, such as clear information on energy usage, an end to estimated billing and back-billing issues, and a remote means for prepayment consumers to top up. Smart meter technologies can also support wider infrastructure and net zero goals, including allowing consumers to save money by flexing their energy consumption to cheaper times of the day. In addition, smart meters are a

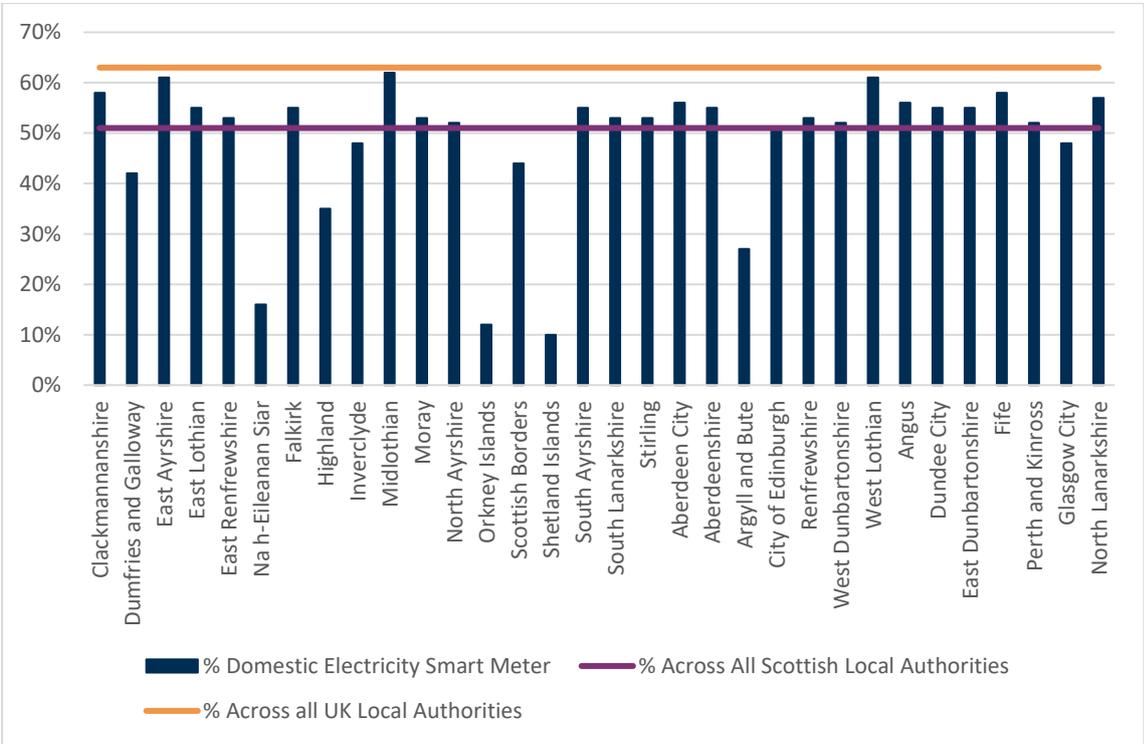
⁴ DESNZ (2025) [Smart Meter Statistics in Great Britain: Quarterly Report to End December 2024](#)

common a prerequisite for the installation of low-carbon technology such as solar PV, batteries and air-source heat pumps. As such, they have an important role to play in

enabling consumers to take advantage of novel technologies and products in the future of the energy retail market, improving consumer choice and providing potential financial benefits. and

However, despite these benefits, the planned rollout of smart meters has been slower across Scotland compared to the rest of the UK. The proportion of installed domestic electricity smart meters in Scotland being only 51%, compared to the UK average of 63%. Low smart meter rollout in Scotland is particularly concentrated in rural and remote areas as highlighted in Figure 1 below.

Figure 1: Proportion of Domestic Electricity Smart Meters Operated by All Energy Suppliers by Scottish Local Authority, up to December 2023⁵



The concentration of the lower rollout rates in rural and remote communities can compound affordability issues that already come with living in rural locations, where the general cost of living is already higher and the prevalence of fuel poverty is greater⁶. The inability for such consumers to access the benefits of smart meters risks these consumers missing out on the

⁵ DESNZ (2024), Q1 2024 Smart Meter Statistics Table, Table 7
⁶ Scottish Government (2023) [Rural Scotland Data Dashboard: 3.2 Cost of Living](#)

benefits of smart meters described above and the improvements in affordability that these can help facilitate

Previous research by Changeworks highlighted two causes of the lower smart meter rollout in rural and remote areas of Scotland⁷:

- Lack of Digital Infrastructure – Mobile network infrastructure in many rural areas was not sufficient for the installation of first-generation smart meters (SMETS1). Second generation smart meters (SMETS2) now rely on long-range radio communications, providing coverage for over 99.5% of Scotland. Though infrastructure is now mostly in place, rural households in Scotland have waited the longest for a smart meter, with some still able to access one at all;
- Lack of Skilled Engineer Support – A lack of skilled meter engineers compounds metering issues and complexities, with some rural households unable to get appointments in a timely manner. Even when engineers are available in a rural location, they may lack the required skillset for a particular meter type if they are unfamiliar with the types of meters more commonly found in rural areas. This can cause additional delays to meter installation or remedying meter problems.

While the proposed changes to the 2015 Regulations seek to encourage suppliers to complete smart meter appointments, Ofgem will also need to work with DESNZ to develop additional targeted incentives under the smart meter rollout programme, ensuring that rural and remote areas become a more commercially attractive priority for suppliers to meet their obligations. However, with more digital infrastructure now in place, and the potential benefits that may come from smart meter installation, there is also compelling case for updating the 2015 regulations so that they encourage smart meter installation wherever a consumer lives in the UK.

Question 2. If yes, what areas of the 2015 Regulations do you consider should be updated to reflect that they apply to smart metering?

We welcome Ofgem’s proposals to specifically reference smart meters within the 2015 regulations, and provide more clearly defined standards and obligations. Clear, defined standards with set timeframes and clearer liability triggers will give consumers more certainty about when they are entitled to action or compensation from their supplier. They should also drive standardised supplier performance as opposed with clearly measurable responsibilities on suppliers as opposed to the previous use of “reasonable” timeframes, that may be interpreted differently across suppliers.

In terms of the explicit wording of the 2015 regulations, we would recommend the following updates should be made to reflect they apply to smart metering:

⁷ Changeworks (2023) [A Perfect Storm: Fuel Poverty in Rural Scotland](#)

- **Smart Meter Definition:** The general interpretation should include an explicit inclusion of smart meters. References through the regulations should then be updated to ensure clarity that all existing provisions apply equally to smart and traditional meters.
- **Smart Meter Installation Definitions:** A new definition for a smart meter installation should be included so that the corresponding supplier obligation can reference it. This should also include reference to applicable installation failures that trigger compensation.
- **Smart Meter Operational Issues Trigger:** Establish a standard that suppliers must investigate operational smart meter issues and provide a resolution plan within five working days of being notified. This can be triggered by consumer contact, or the supplier's own systems no longer receiving smart data, to ensure consumers who are not as engaged in the market are not excluded from these protections, as discussed in the consultation document.
- **Non-Functioning Smart Meter Definitions:** We are concerned that 90 days is a long period of time for a smart meter not to be communicating with the supplier. In the worst case scenario, a consumer may find themselves with an accurate bill only successfully send a signal four times a year, and the smart meter would not meet the criteria here of "non-functioning".

Smart Meter Installation Appointment Availability

Question 3. Do you agree that a new standard to ensure requests for smart meter installation appointments are fulfilled within a set number of weeks is right for consumers?

Yes, we agree that introducing a new standard requiring smart meter installation requests to be fulfilled within a set number of weeks is correct for consumers.

Clear timeframes will provide both consumers and suppliers, with certainty of what is expected. This should improve trust and confidence in the smart meter rollout and ensure that delays are minimised. With set timeframes, suppliers should be able to prioritise installations efficiently, supporting a faster and fairer smart meter rollout.

Question 4. Do you agree that six weeks is an achievable timeframe to meet?

While suppliers are best placed to assess operational feasibility, we support Ofgem setting an ambitious timeframe to drive timely installations. A timeframe that is overly generous risks undermining the policy objective of delivering a positive consumer experience and accelerating the smart meter rollout.

Question 5. Do you agree this should apply to new/first time smart meter appointments only?

We accept that applying the new standard to first-time smart meter appointments aligns with the current policy aims. However, Ofgem should keep this under review, particularly given that around 10% of smart meters are operating in traditional mode based on the Government's own statistics. If operational faults become a growing issue, updated standards should be considered to improve timeliness for repair appointments as well.

Question 6. Do you agree that this should only apply in cases where a consumer is technically eligible to have a smart meter installed, and what do you consider those cases to be?

Suppliers are best placed to provide a technical assessment of eligibility, as they have access to site-specific information and technical capability. However, it is right that the standard should apply only where a consumer is technically eligible, including having sufficient WAN coverage (which is already a prerequisite a supplier must check before an installation⁸ a suitable smart meter is available, and there are no site-specific barriers (such as unsafe conditions) preventing installation.

It would be beneficial for Ofgem to more clearly define eligibility criteria. This could be done using existing frameworks like the Smart Energy Code (SEC) to allow consumers to understand why an installation may not be able to proceed.

Question 7. Are there any other exemptions that should be considered with this standard?

No answer.

Question 8. Do you agree a consumer could receive this compensation every six weeks should a supplier not be able to offer an appointment in that time frame?

We support consumers receiving compensation every six weeks should a supplier not be able to offer an appointment in that timeframe. Regular, repeated compensation acts as a strong incentive for suppliers to resolve issues quickly, ensuring better service and providing consumers with meaningful redress.

⁸ [Consolidated Smart Energy Code \(SEC\)](#), Appendix I, Section 4;

Question 9. Are there any other factors not clearly outlined you think need to be considered?

While it is outside the scope of the current consultation, we strongly recommend that Ofgem also considers other policy routes to encourage smart meter installation, especially with the current Smart Meter Programme set by DESNZ due to end in 2025.

The current Smart Meter roll-out programme sets a uniform national obligation to offer smart meters, despite rural areas being often more expensive and logistically harder for suppliers to reach than densely populated urban areas.

While modifying the Guaranteed Standards to allow for compensation payments will drive some change, Ofgem and DESNZ could encourage supplier behaviour change by removing some of the disincentives that suppliers currently face for rural smart meter installations. For example, the introduction of specific rural installation targets or extra credits for rural installations would provide suppliers with a greater incentive to tackle the low rollout in remote and rural areas in Scotland.

There may be learning here from other policy domains, where national targets are augmented by sub-national targets to help achieve a higher degree of consumer fairness. Such examples include targets used by Ofcom to support the provision of 4G/5G technology within rural areas.

Smart Meter Installation Failures

Question 10. Do you agree a new standard to ensure consumers receive compensation for failed smart meter installations, where the failure is within a supplier's control, is right for the consumer?

We agree that where a smart meter installation has failed due to an action or inaction within the supplier's control it is right for consumers to be compensated. Domestic consumers will lose out on time and suffer inconvenience if a supplier fails a smart meter installation. Financial compensation provides an incentive for suppliers to make sure they get the smart meter installation correct in the first instance.

Question 11. Are there any scenarios within an energy supplier's control leading to failed smart meter installations that have not been covered?

We suggest Ofgem consider two other scenarios within any energy supplier's control leading to failed smart meter installations:

- Incorrect or incomplete pre-installation household surveys – where a supplier may have not properly surveyed or gathered information (including surveys that are poorly conducted or outsourced incorrectly) about a consumer’s household leading to a failed installation.
- Data mismatches – where a supplier holds incorrect customer account data (including wrong type of meter registered, or a wrong MPAN or MPRN) that doesn’t match what is physically present and may mean they are unable to proceed. This should have formed part of the pre-installation surveys.

These scenarios may already form Ofgem’s thinking around some of the presented scenarios (e.g. an incorrect household survey may lead to a supplier not having the requisite tools to install a smart meter). However, in the interests of providing clear expectations to both parties we believe these types of scenarios should be referenced either as types of failed installation, or form any corresponding guidance that is available to suppliers and consumers.

Question 12. Do you agree this should be applicable to both first time and replacement smart meter appointments?

We agree that consumer compensation should be applicable to both first time and replacement smart meter appointments. In both types of appointments, consumers will be inconvenienced by not having an operational smart meter fitted. Further, whether it is an initial smart meter installation or replacement, suppliers should be held to the same standards of having the right meter, equipment and skillset to perform a successful installation. Establishing the standard to apply to both types of appointments will encourage suppliers to have high standards for consumers, increasing consumer confidence in the smart meter rollout.

Question 13. Do you agree there should be no restrictions on the number of times a consumer could receive this compensation?

We agree that there should be no restrictions on the number of times a consumer can receive compensation. From a fairness and redress perspective, consumers should not be penalised for repeated failures outside their control, and ongoing compensation ensures that if they find themselves in a situation of prolonged detriment, they will be treated equitably for the prolonged inconvenience they suffer.

Given the practical complexities of smart meter installation - such as technical checks, site access, and the requirement to have appropriate equipment and skill set for any given property, multiple delays may be possible if a supplier is not sufficiently prepared. Repeated compensation for failures within the supplier’s control both rightly reflects the ongoing

inconvenience that a consumer could find themselves in such circumstances, and motivates suppliers to prioritise a timely resolution if a consumer suffers an initial installation failure.

Question 14. Are there any other factors not clearly outlined you think need to be considered?

No answer.

Investigating Smart Meter Operational Issues

Question 15. Do you agree that this standard would support customers with suspected problems with their smart meters and IHDs?

We agree that the standard should support customers with suspected problems with both their smart meters and In-Home Displays (IHDs). Ensuring the correct operation of the Home Area Network (HAN) - including the transmission of data from the smart meter to the IHD - ought to be expected as part of good installation practice and within the supplier's control. Therefore, the relevant standard should extend to, and make explicit reference to, ensuring the IHD is operational.

Further, suppliers are already under an obligation to maintain smart metering systems, including any IHD, under the Standard Licence Conditions⁹. Without a corresponding compensation standard specifically for IHDs, there is a risk of inconsistency. Consumers could receive compensation if a smart meter fails, but no redress if the IHD - arguably a consumer's main tool for accessing their real-time usage data - is faulty. This may create confusion for consumers and undermine trust in the smart meters framework if a faulty IHD significantly limits a consumer's ability to benefit from smart metering.

With the development of the retail market, Ofgem should also keep under review the definition of the IHD, recognising that consumers may also monitor their energy usage through smartphone apps or web portals, and ensure that protections reflect this evolving practice.

Question 16. Do you agree the best approach is to expand on the existing "Faulty meter" and "Faulty prepayment meter" standards?

⁹ Standard Licence Condition for Gas Suppliers 33.15(e)

We believe it would be possible to expand upon regulations 4 and 5 for faulty meters and prepayment meters, as well as our recommendations outlined in our response to question 2 above, to meet the aims of this policy.

Question 17. Are there any other factors not clearly outlined you think need to be considered?

No answer.

Smart Meters Not Operating in Smart Mode

Question 18. Do you agree a new standard to ensure consumers receive compensation for a smart meter that does not operate in smart mode, which is within a supplier's control to resolve, and has not been resolved, is right for consumers?

Yes we agree a new standard to ensure consumers receive compensation for a smart meter not operating in smart mode is right for consumers. However, as discussed below in response to question 19, Ofgem must investigate how best to incorporate failures by the DCC into consumer protections around operational smart meters. As the stakeholder responsible for the smart energy network, the DCC play a crucial role in maintaining the operation of smart meters. However, the DCC do not have a consumer facing operation and are not subject to any guaranteed standards of performance. While there are quarterly and yearly targets on their performance, individual consumers have no recourse to getting an issue resolved when the DCC is partially or wholly responsible.

Question 19. Do you agree with our initial views of "in scope" and "out of scope"?

We broadly agree with Ofgem's initial views on what should be considered "in scope" and "out of scope." However, we recommend that Ofgem should work with other stakeholders to close the current "accountability gap" on associated actions within control of other smart network partners.

Citizen Advice's *Get Smarter* report highlights that smart meter faults can arise wholly or partially from the responsibilities of the DCC¹⁰. When such faults occur, consumers often face significant difficulty identifying the problem, understanding who is responsible, and securing timely resolution.

Under the current proposals, issues such as a loss of Wide Area Network (WAN) connectivity would be classified as "out of scope" as this is partially or wholly the responsibility of the

¹⁰ Citizens Advice (2024) *Get Smarter: Ensuring People Benefit from Smart Meters*, p. 11-12

DCC, leaving consumers without effective recourse. Given the DCC has no consumer-facing role, affected consumers are left without a clear path to resolution, undermining the overarching aim of these proposals to ensure universal access to smart meter functionality. We recommend that Ofgem investigate options to close this accountability gap.

One potential route would be for Ofgem and DESNZ to create an obligation on suppliers to provide reasonable compensation to consumers affected by such “out of scope” faults arising from smart network partner failures. Suppliers could then seek recovery of costs from the DCC, creating mutual incentives across the supply chain to identify and resolve faults quickly, and strengthening consumer protections.

This kind of supplier cost recovery has precedent in UK utility regulation. In UK broadband operations, the physical network provider, Openreach, has no direct contractual relationship with consumers. Like energy, a consumer’s contract is with their service provider. However, if a line fault or missed engineer appointment occurs, the broadband supplier compensates the consumer (often automatically), and then seeks redress from Openreach via service level agreements or credits¹¹. Broadband regulators have therefore ensured that network failures result in consumer compensation without requiring the consumer to pursue the network company. Our proposal mirrors this: the energy supplier would handle customer service and compensation, and the DCC would compensate the supplier for network failures. This kind of back-to-back compensation chain has proven effective in practice- it keeps the customer experience simple, fairly reimburses suppliers, and holds the smart network partner to account financially for its performance.

Supplier risk, where they are waiting to recoup compensation costs from the DCC, should be minimised by preexisting checks and balances in the Smart Energy installation process. For example, at the preinstallation stage, WAN coverage checks and high quality assurance standards already oblige DCC to minimise WAN coverage issues¹². Therefore, adopting a supplier cost recovery process ought to only affect suppliers in a minority of situations, while ensuring consumers are not left with no direct recourse or redress.

Ofgem should work with DESNZ to ensure both the Smart Meter Communication Licence, and the overarching policy framework and objectives of the smart metering program and smart energy network, provides consumers with a clear and transparent route for redress for such faults.

Question 20. Do you agree with our initial views on what constitutes a “smart meter” and “not operating in smart mode” for the purposes of this proposal only?

¹¹ Openreach (2021) [Contract For Connectivity Services, Schedule 4 – Service Level Agreement, Schedule 4B.4](#)

¹² [Consolidated Smart Energy Code \(SEC\)](#) Paragraph F7.18-19

We agree with Ofgem's initial views on the definitions of "smart meter" and "not operating in smart mode".

Question 21. How do you consider "actions of another party" could be clearly defined for this proposal?

"Actions of another party" should be defined narrowly to include only events genuinely outside the supplier's control, such as property access issues caused by third parties. We agree that the definition should exclude actions by supplier appointed agents, contractors, or any subcontractors that are related to supplier operations. For the purpose of providing clear information to consumers and setting clear expectations, this wording should be contained within the standards.

Question 22. Do you agree that 90 days is an appropriate timeframe to resolve smart meters not operating in smart mode in the future?

We are concerned that 90 days is disproportionately long for a smart meter not to be communicating with the supplier and undermines consumer protections. In the worst-case scenario, a consumer may find themselves with an accurate bill only successfully send a signal four times a year, and the smart meter would not meet the criteria here of "non-functioning". Consumers are unlikely to actually benefit from smart products and tariffs, or accurate billing in this scenario.

A shorter defined period, e.g. 30 or 45 days, paired with escalating compensation for delays, would incentivise timely repairs, and provide consumers with greater protections.

Question 23. Do you agree consumers should receive compensation for both gas and electricity meters if applicable?

While suppliers and installers are best placed to comment on technical feasibility, we would encourage identical protections for both gas and electricity meters. Firstly, a single scheme for both smart meters provides consumers with a simplified scheme of guaranteed standards that are easier to understand. Secondly, depending on the smart metering set up in a household, a fault with one meter may affect the smart connectivity of both meters, denying a consumer the benefits for both meters. For example, in some smart metering set ups, the gas smart meter will connect to the communications hub mounted on the electricity smart meter. Therefore, if the electricity smart meter is not operating properly, the gas smart meter may also appear to be faulty. Ofgem should consider how to ensure regulation reasonably reflects smart metering infrastructure.

From a consumer perspective, after technical feasibilities have been properly accounted for, it is right that compensation should apply to both gas and electricity meters where applicable. Each meter provides essential information for accurate billing, energy management, and day-to-day budgeting. Failures in either service can create real detriment for consumers — including estimated bills, financial uncertainty, and loss of trust in smart metering. Offering compensation for issues with either or both meters ensures consumers are protected and reinforces confidence in the smart meter programme.

Question 24. Do you agree that for each instance of an “in scope” smart meter not operating in smart mode, the consumer should receive another compensation payment if the meter remains not operating for 365 days, and for every other 365-day period thereafter?

We agree that consumers should be entitled to repeated compensation payments for each instance of an “in scope” over a set period of time.

We would welcome further guidance from Ofgem why they have chosen to set this number at 365 days, and whether this sufficiently incentivises suppliers to fix problems and reasonably compensates consumers. As highlighted earlier, the Government’s own statistics highlight that around 10% of smart meters are operating in traditional mode. Although the proposed revisions to the 2015 Regulations are not the only tool to encourage suppliers to repair faulty smart meters, a shorter time frame may encourage companies to put more resources into this area.

Question 25. Are there any other factors you think need to be considered that have not been covered in this section for this proposal?

No answer.