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**Non-Domestic Smart Meter Rollout Post-2025:
Driving Smart Meter Uptake in support of the Clean Power Mission and
Protecting Non-Domestic Consumers in the Transition to Smart-Contingent
Contracts**

I am writing in response to the Government consultation on a new policy framework to drive the installation of non-domestic smart meters.

British Property Federation (BPF)

The BPF represents the real estate sector – an industry which contributed more than £116bn to the economy in 2020 and supported more than 2.4 million jobs.

Our members include some of the UK's largest commercial landlords. BPF members have hundreds of billions of pounds of assets under management, including over 100,000 homes and hundreds of millions of square feet of commercial real estate space.

Consultation paper

We recognise the real estate sector is not the target audience for this consultation, and many of the consultation questions are not directly relevant to BPF members. However, access to energy data is a priority issue for many real estate investors and owners and smart meters play an important role in facilitating the exchange of energy data between tenants and landlords. We want to take this opportunity to (1) **highlight the importance of energy data** to support the decarbonisation of our commercial buildings; (2) **call for mandatory data sharing** as opposed to guidance; and (3) **challenge the suggestion in the consultation paper that commercial landlords are a barrier to the installation of smart meters** in non-domestic buildings.



Energy data

The consultation paper notes that smart meter data can be used *“to identify potential savings from clean heat measures and inform decisions about how to retrofit buildings and decarbonise operational processes. It can be used to set, and evidence progress against, emissions reduction targets, support commercial landlord portfolio planning towards decarbonisation pathways and inform business cases for green finance and grant applications.”*

We welcome the recognition of the importance of energy data for real estate investors and owners, and for tenants. In fact, we would go further. Access to accurate, timely, granular energy data is critical for real estate investors’ decarbonisation plans. In turn, this will help deliver Government policy on energy security and tackling the cost of living by reducing energy demand and bringing down energy bills for tenants.

The BPF has previously published research on this. [Closing the Data Deficit](#) looks at the important role of energy data in the net zero transition, examines the challenges and barriers to sharing data, explores how technology can help and makes a series of policy recommendations.

Mandating data-sharing

The consultation paper states that Government *“intend to develop guidance for commercial landlords and tenants on how they can cooperate to navigate the existing non-domestic energy data landscape and access the data they need to decarbonise their premises”*.

BPF [research](#) shows that the lack of access to energy data is one of the biggest barriers to decarbonising our commercial buildings. We welcome Government support to encourage the sharing of energy data between landlords and tenant. However, we are not persuaded that more guidance is the answer.

There is already long-standing industry guidance on data sharing. The [Better Buildings Partnership \(BPP\) Green Lease Toolkit](#) provides template green lease provisions including clauses on data sharing between landlords and tenants (as well as on the landlord’s ability to install smart meters).

However, despite this guidance, and despite the growth in green leases, there are still a range of legal, cultural, practical and technological obstacles to accessing energy data. These are set out in more detail in our [Closing the Data Deficit](#) research. As a result, the real estate sector has been calling for Government to



mandate the sharing of energy data between landlords and tenants. **We would like to see a requirement to share energy data form part of the new policy framework on non-domestic smart meters. If the Government does proceed with new guidance, we would ask to be consulted and will be looking for assurance that any new guidance aligns with existing industry standards.**

Barriers to installation

The consultation paper suggests that commercial landlords are unaware of the benefits of smart meters and may be refusing requests from tenants who wish to have smart meters installed in their buildings. We would challenge this. Our members support the installation of smart meters and our [research](#) makes clear that – certainly for larger commercial landlords – smart meters are widely used and the benefits well understood. In fact, our [research](#) calls for action to speed up the roll out of smart meters.

We would also point to industry best practice, such as the [BBP Green Lease Toolkit](#) and the [Model Commercial Lease](#), which support the installation of meters/smart meters.

The main barriers to installation that we hear from our members include a lack of installers and a lack of reliability around installations (i.e. installers not turning up), challenges with certain building-types, concerns around accuracy and reliability, and in some cases a push back from tenants.

We would ask that the wording of any policy statement or template letters reflect the fact that landlords are generally supportive of installing smart meters and are not unreasonably refusing requests. We would also ask to be further consulted on any final draft policy statement and template letters before these are published.

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