

## Consultation response

Consultation Question 1
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Are these the right aims and objectives against which to evaluate the Government's consumer engagement strategy for smart metering? Please explain your views.
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RNIB welcomes and endorses the aims to "helping all consumers to use smart metering to better manage their energy consumptions and expenditure" and to "ensure that vulnerable and low income consumers can benefit from the roll-out."

It is especially important to have a coherent central approach as individual suppliers will be targeting their own vulnerable customers.

Consultation Question 2
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What are your views on focusing on direct feedback, indirect feedback, advice and guidance and motivational campaigns as behaviour change tools? What other levers for behaviour change should we consider?
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RNIB is happy with the above behavioural change tools, however feels that the following points need to be taken into consideration:

- Direct feedback is provided by the in-home-display. For everybody, including blind and partially sighted people, the IHD, mobile phone apps and websites etc. need to be fully accessible and easy to use. This means that there needs to be some IHDs that talk and have a large font (and other accessible visual and tactile information) on the display.
- With indirect feedback – bills and other information must also be offered in accessible formats such as braille, audio and large print or customers will not be able to engage
- Guidance must also be given in accessible form, but also in a way that is usable and understandable. Pictorial graphs must be rendered in an accessible way
- RNIB does have a concern about reaching older people (80+), in that the information needs to be accessible and easy to understand. Even though many older people are not registered blind or partially sighted, or consider themselves



to have a sight problem, many would benefit from clear easy to read and understand information, and this will be essential in putting the message across, especially where disincentives are involved.

- The use of disincentives must be carefully implemented and the suppliers must ensure that they fully support people with sight problems before threatening to employ disincentives?

Consultation Question 3
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What are your views on community outreach as a means of promoting smart meters and energy saving behaviour change?
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RNIB feels that community outreach could be a good means of promoting smart meters and energy saving behaviour change. The following are some ways in which this could be implemented:

- Community delivered motivational campaigns could work, especially when blind organisations at a regional level are involved.

Consultation Question 4
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Have the right evidence requirements been identified for Foundation learning? What other evidence or approaches to research and trialling might we consider?
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RNIB represents a user group with, in some cases, quite particular needs, although in general everybody will benefit from easy to use and accessible products. These needs however are not always included when designing for the general public and we are therefore very interested in any research and trialling to make sure that our user group is included. If they are included from the start the need for redesign and/or retrofitting is eliminated, reducing development and manufacturing costs.

- We entirely support the planned research by National Energy Action and Customer Focus to better understand the needs of vulnerable customers. We would like to be involved in the "further work" (see 3.11) suggested during the Foundation stage, particularly around the accessibility of IHDs for these customers.
- We very much welcome section 3.12 but would point out that IHD screens will be totally inaccessible to people with no



sight, and so other methods (such as text to speech) should be implemented in the IHD technologies.

- We welcome section 3.13 but note that it is important to think about how error messages are communicated to blind and partially sighted people, who may not even be aware that there is a problem with their equipment that is needed to be solved, if the error is only presented visually (such as the IHD powering off). If the IHD is designed in such a way that it is accessible then this issue will be resolved.
- We support 3.14 and we must absolutely protect customers from carrying out tasks that are dangerous to their health.
- With regards to the use of Pre-Payment Meters (PPM) (3.15), as per IHDs, it is key that the PPMs (and top up methods) are accessible and usable by the end user, including those who are older or have limited or no sight.
- Given that the cost of smart meters is being taken on by the energy suppliers (3.18) then the prime driver will be low cost. Our concern is that suppliers will not voluntarily add functionality such as text-to-speech, tactile feedback and very large text displays as this is not part of the minimum specification. We don't expect this to be mandated for all IHDs but would expect some devices to be fully accessible. It is likely that this would need to be specifically funded, due to the extra cost of retrofitting existing IHD systems.
- If you are going to be testing alternative IHD designs (3.22), then these need to involve inclusive design.
- We need to be involved in the trial plans and the trials (3.23/24)

#### **Other issues**

Priority service customers:

4.2 We have a concern regarding how priority service customers are identified. Many people might not know or acknowledge that they have additional needs (E.g. many people will see their sight loss, hearing loss, reduced mobility, dexterity and memory as a normal part of getting older and not realise that this might affect the way they interact with for example an IHD).

The installation visit (page 35, 4.9):

4.11 Will suppliers be trained in the specific needs of Blind and Partially Sighted People when giving advice on how to use their IHD? Eg knowing the information access needs of the customer? Suppliers are already developing procedures for vulnerable customers but may not have consulted third sector experts on disability.

In-home display:

4.13 We feel that the words 'accessible and usable' should be included in the second sentence so that it reads as: "Requiring all suppliers to offer an accessible and usable IHD to all domestic consumers will ensure that as many as possible have easy, rapid access to relevant information on usage, expenditure and their meter balance." If an inaccessible and/or unusable IHD is offered then there will be no easy, rapid access to information.

4.15 How will you ensure that accessible IHDs are available to blind people when Text To Speech is not part of the minimum requirements?

Box 2 – Inclusivity by design (page 37)

The report from User Focus and Ricability (linked in the text) needs to be taken into account regarding the specific needs of people with sight loss.

<b>Consultation Question 5</b>
What are your views about the desirability of the Programme, or other independent parties, making available information on different suppliers installation packages and their impacts? When might this be introduced?

4.17 This is very important for Blind and Partially Sighted People who might want to move from one supplier to another. If they are issued with a talking IHD, will this move with them? How will they know which suppliers provide this if this info on IHD functionality isn't made available or made available in an accessible format?

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<b>Other issues</b>
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4.20 Any tool, such as the online comparison tool, must be accessible. Use of graphs should be accompanied by a text description of the data in a usable way.

Consultation Question 6
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Do you agree that a centralised engagement programme, established by suppliers with appropriate checks and balances, is the most practical solution given other constraints? If not, what other practical alternatives are there?
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The only way to deliver a targeted help scheme of accessible IHDs for Blind and Partially Sighted People would be through a centralised programme, given the lack of commercial driver for the suppliers to provide this themselves.

Consultation Question 7
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Do you think that suppliers should be obliged through licence conditions to establish and fund a Central Delivery Body or would a voluntary approach be preferable?
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No comment.

Consultation Questions
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| <p>8. What are your views on the proposed objectives for the Central Delivery Body? Are there any additional objectives which should be included?</p> <p>9. What are your views on the suggested activities for the Central Delivery Body?</p> <p>10. Do you have any views on mechanisms for monitoring progress and holding suppliers to account in delivering objectives?</p> <p>11. How can we ensure sufficient effort and funding to achieve the objectives is balanced against the need to keep costs down?</p> |
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For Objective 2 and the relevant activities – this will be beneficial for customers who have sight problems, unless the installation of their Smart Meter is significantly delayed because they need extra support from the CDB.

Monitoring could take place against suppliers own lists of vulnerable people to make sure that these people are not left till last.

Consultation Questions
12. Do you think contracting an existing organisation or setting up a new Central Delivery Body would be a workable mechanism for delivering consumer engagement? What are the advantages and disadvantages of these two options?
13. Do you think the objectives and activities of the Central Delivery Body described here will help deliver the aims of the consumer engagement strategy (see paragraphs 4.32 – 4.33)? Please explain your views. Do you have any alternative suggestions?
14. How can we ensure that the Expert Panel attracts a sufficient level of expertise?
15. Do you foresee any conflicts between this approach (particularly when structured in accordance with the information provided in the rest of this chapter) and competition law? If so, what are these and how might they be addressed?
16. Do you have any other comments on how a governance framework could be designed to ensure the appropriate balance as described in paragraph 4.35?
17. What role should smaller suppliers have, if any, in setting up a delivery mechanism for central engagement? What should the ongoing relationship between small suppliers and the central delivery mechanism be?
18. What role, if any, should network companies and communications service providers have in central engagement?
19. Do you agree that the timings for the creation of a Central Delivery Body as set out above are achievable? Please explain your views.

No specific comments

Consultation Questions
20. What are your views on the need for the Central Delivery body to establish an outreach programme?
21. Should there be requirements for suppliers to share roll-out plans with the CDB and for the body to take them into account?



As a third party, if our engagement regarding accessible information, communication and IHD design is not shared between suppliers then we do not have the resources to engage.

Suppliers must share their timetable so we can co-ordinate the manufacturing availability of accessible IHDs.

Consultation Question
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22. Is there value in such a brand and if so, when should it start to be visible? Should suppliers or other stakeholders be able to use the brand on their own (non-central body) smart meter communications and if so, on what basis?
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We are convinced that there was value in the Digital Switchover brand per se, but there were no suppliers to roll it out – people had to buy their own equipment. Thus this was a completely different model.

Also, because the digital switchover relied on local authorities to identify people with sight problems, and also would only help those registered blind or partially sighted, there was an issue with low numbers of people who opted in to the help scheme under Digital Switchover. Another factor in this was that by the time the largest regions switch to digital television, the majority of the population had already bought their own inaccessible television equipment.

Consultation Questions
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23-31. (Licence Conditions)
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32-35. (Non-domestic customers)
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36. (Energy efficiency incentives)
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No specific comments.

