

Installation Code of Practice – a consumer perspective

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Aims of the Installation Code of Practice (ICOP)

- Ensure customer experience of the 'home visit' and of smart metering is a positive one
- Ensure installation experience is consistently high quality for all consumers regardless of supplier or customer circumstances
- Help ensure the delivery of consumer benefits of smart metering:
 - energy efficiency and bill savings
 - social benefits: improved assistance to low income and vulnerable consumers



Scope of our ICOP proposals

- These ideas are for domestic consumers only – but believe that need to give a consideration to an equivalent for micro-businesses
- Regulatory document – not consumer facing unlike the Customer Charter
- Covers all consumers regardless of whether they proactively contacted the supplier for a smart meter
- Should include priority service of additional help for low income & vulnerable consumers
- Does not cover consumer protections that in the licence conditions or wider consumer regulation.
- Licence conditions and Codes need updating to be smart ready but cross referenced in ICOP
- Pre, during and post installation visit & action by suppliers to help consumers realise the benefits of smart metering

SMART METER



**DO NOT INSTALL
SMART METER HERE**

Consumer representation:

Consumer Focus, Age UK, Citizens Advice, EST, FPAG, Green Alliance, NEA, Sustainability First, Which? NHF

Setting up the Code of Practice

Ofgem

Set out clear principles for its scope and content.

Set out licensing framework.

Approve code for use

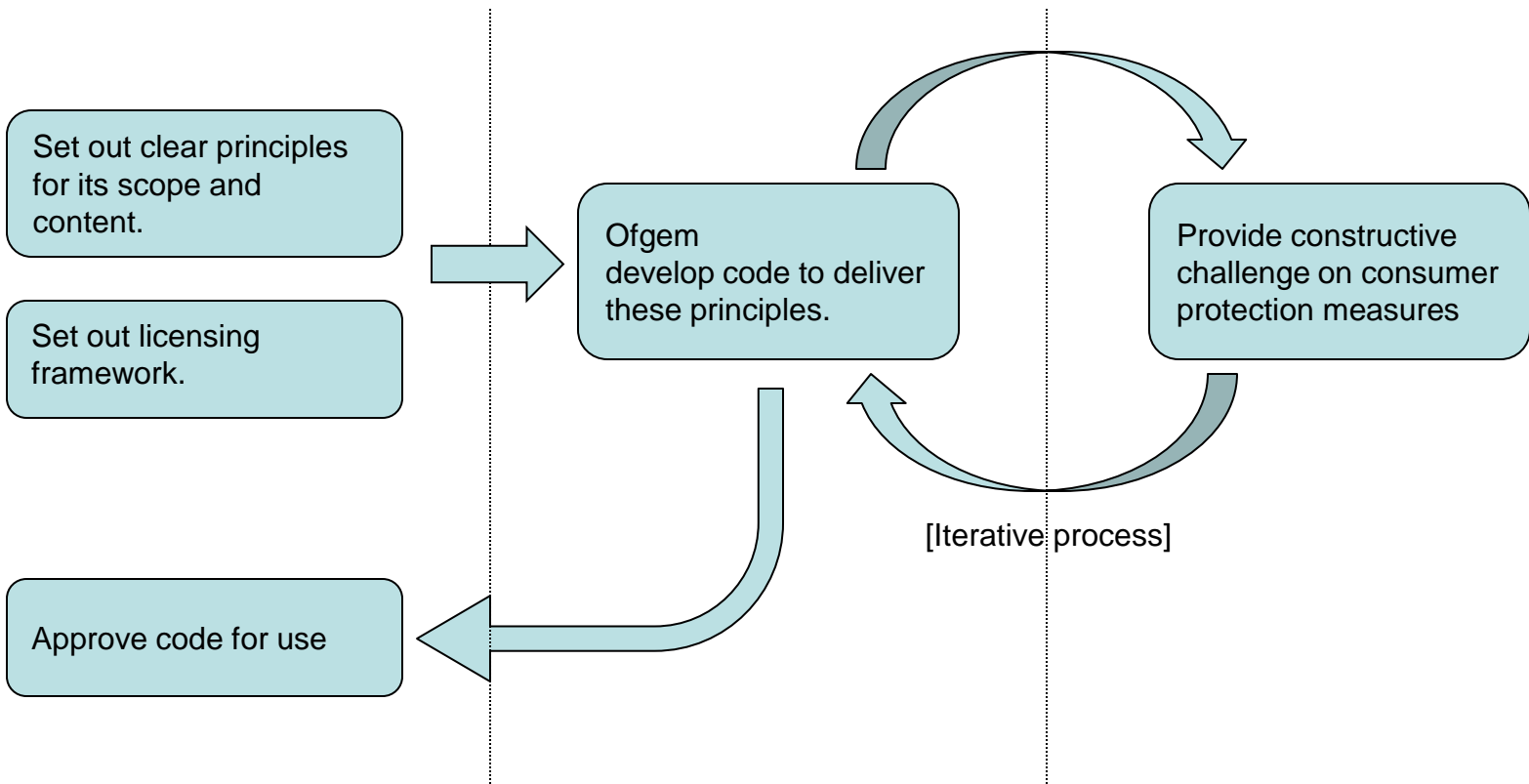
Industry

Ofgem develop code to deliver these principles.

Consumer Groups

Provide constructive challenge on consumer protection measures

[Iterative process]



Code of Practice – governance

- Mandatory rather than optional
 - Licence-backed, accede and comply
- Auditable and audited
 - Periodic public reporting on any thematic / systemic issues needing attention. Agreed metrics focused on delivering consumer benefits
- Credible independent oversight
 - Consumer representation, including ‘boots on ground’
- Any code objectives should consider the consumer case as well as the business case

Pre-installation 1— *What should customers expect pre-visit? NB: this is not a comprehensive list*

Contact: customers prompted to have an appointment via a reply card/letter. Able to call a free-phone number, free from mobiles as well as landlines.



Information: Given clear information in advance given about why the visit is needed and what it will entail – common messaging across suppliers & agencies.



Convenience: offered flexibility of installation day and time. Given two hour installation window and weekend/eve visit options at no extra cost – not just am/pm. Time arranged.



Safety: customer given a password to guarantee the validity of the installer, told installers will be in their supplier's uniform & have ID. They are all appropriately qualified and CRB checked. This will be confirmed via letter or email? They are told how many people will be arriving (one or two).

Pre-installation 2 – *What should customers expect pre-visit? NB: this is not a comprehensive list*

Vulnerability check: carried out by supplier to identify if the customer is entitled to extra help or needs additional assistance e.g. carer or translator present. Redirected to separate scheme. (Licence or COP?)



Trust is key: no sales or marketing. Option to opt-into information only about energy efficiency products and services and a free energy efficiency audit. Customer signposted to independent advice and comparison services about energy efficiency services – question what is consent?



Hard copy supporting information – Consumers signposted to information available on supplier's website. Offer of more information & Customer Charter sent to customer. Free-phone contact for follow up questions.



Peace of mind - Supplier working in partnership with local agencies eg police, local councils so if customer calls to confirm what has been said they can advise appropriately

Day of the visit

Convenience: meter installer phones ahead to say when coming.



Professional: meter installer arrives on time – shows ID and gives password. Installer takes off or covers shoes. Explains the process including the expected amount of time the customer will be without supply.



Location of meter: Meter located in a place that is 'safe and practical' for use as a PPM, in case of remote switching to prepay or for customer re-enablement of supply.
Location of meter recorded.



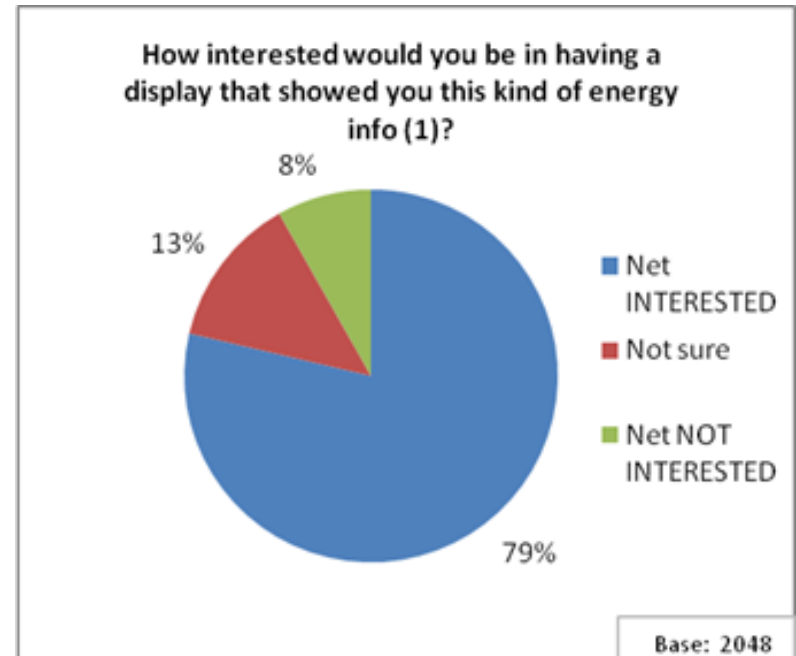
Efficient: Time customer is without supply kept to a minimum. Co-ordination between suppliers, network operators and other parties to ensure quick resolution where issues arise eg unsafe wiring.



Safety checks – appropriate safety checks are carried out.

Day of the visit – the display

1. **Free separate display** given with all smart meters. Given choice of display to ensure ease of accessing information. Eg (large buttons, colour, size). Displays available for those with sight problems, hard of hearing, dexterity problems.
2. **Choice** of mains powered or portable? Customer given choice in the **positioning** of fixed display.
3. **Explanation:** Customer is taken through how to use the display. The importance of maintaining an adequate heating regime must be emphasised.



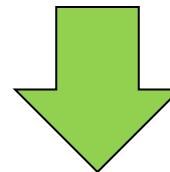
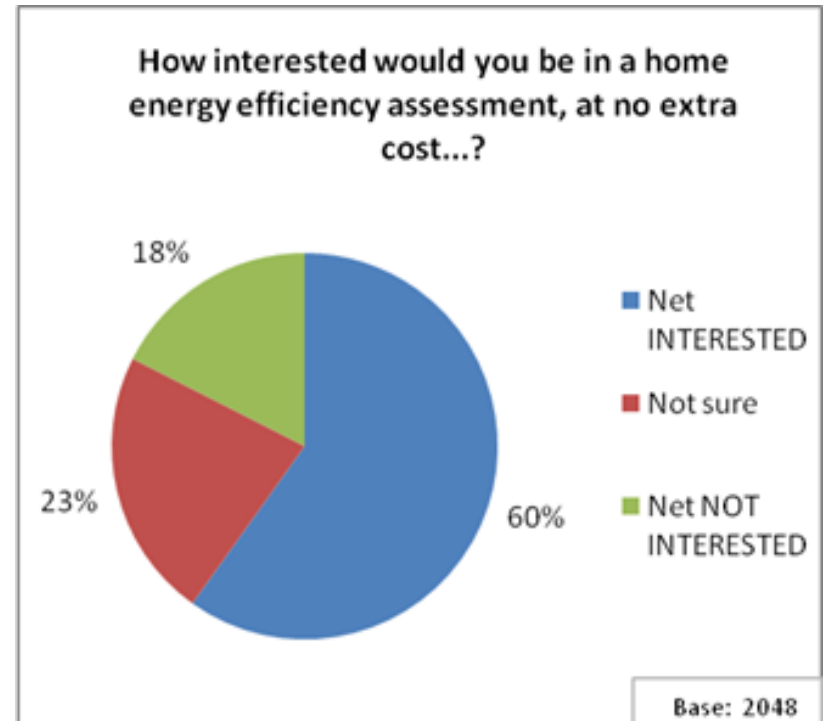
79% interested in having a display

Day of the visit – the display

- 4. Display is demonstrated** eg turning kettle on and off. Other behavioural changes are also suggested along with indication of potential savings from them (these need to be standardised/consistent).
- 5. Potential benefits:** The potential benefits of proper use of display are explained with indication of possible savings (information on this needs to be standardised and consistent across all suppliers).
- 6. PPM customers:** information about re-enablement of supply and new functions provided to PAYG customers.
- 7. Easy:** display is set up and left on and operational. Quick use guide left with customer.
- 8. Refusal:** in cases where customer objects to installation of the display, alternative feedback options should be explained as well as the right to change their mind later. Offered alternative displays alongside not instead of, stand alone display. Eg via web, TV, phone.

Day of the visit – energy efficiency

- Free energy efficiency audit is conducted where accepted and customers who have opted in are given information about products and services
- Advisors must distinguish clearly between independent advice and partial sales based suggestions
- Signpost to independent advice and comparison sites
- **No signing of contracts**
- **No tariff sales during the installation visit esp. TOU**



Smart meter pack

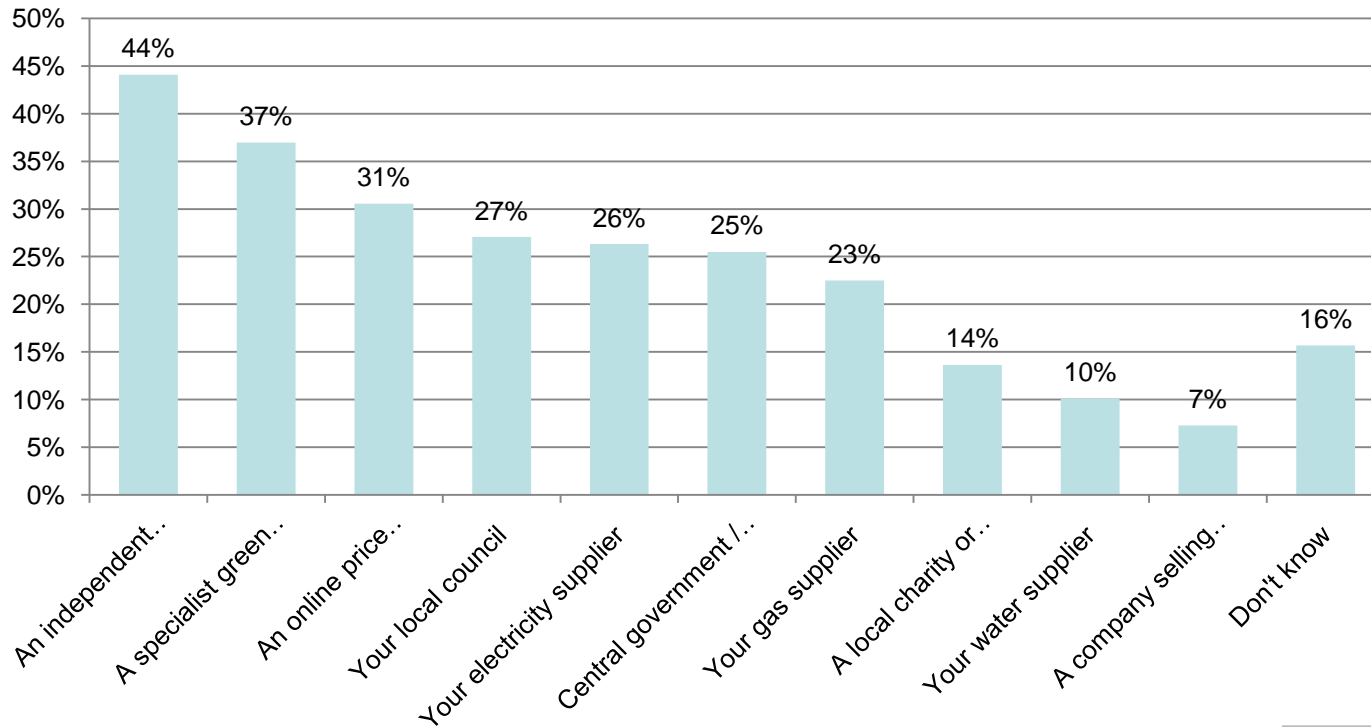
Customer given and taken through the Smart Meter Pack.

- Standardisation of parts of the pack is needed:
 - Information common to all suppliers
 - a) energy and water efficiency including signposting to independent advice
 - b) Customer Charter
 - c) signposting to extra help for customers in financial difficulties including local agencies
 - Core information eg how to use the display and the meter, re-enablement of supply
 - All communications tested in consumer focus groups/crystal marked for clarity



Common messaging/partnerships

Which of the following would you trust to provide you with advice on cutting the cost of your energy bills and going green?

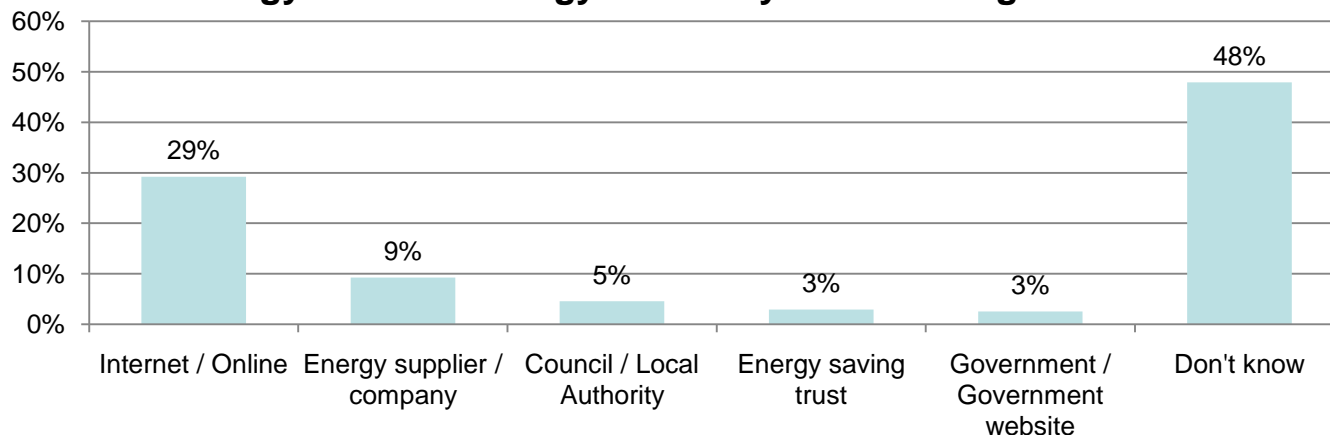


Base: 2048

Before the supplier leaves...

- **Hygiene factors:** supplier leaves home as when arrived eg reset clocks, clean up mess, put furniture back
- **Feedback:** All customers left with a feedback card & contact details
- **Ongoing support:** where to go for advice, if have any questions, including free- phone number, website etc. Where can they go for independent advice on saving money and going green. Our research showed that **nearly 50%** of consumers did not know where to go

Where would you go to get advice and help on cutting your energy bills and energy efficiency measures eg insulation



Post installation 1 – licence conditions need updating & strengthening

1. Sales & marketing:

- No marketing messages sent through the displays
- New protections around time of use tariffs & new deals

2. Bills/consumption feedback:

- Timely, free, easy to understand information on customer's energy consumption that allows them to make like for like comparisons with other deals
- The detail of customer feedback on consumption reflects at least the level of consumption data recorded for that consumer. eg if the customer has half hourly data recorded, customer feedback should show this level of granularity
- Continue to have free access to hard copy bills

Post installation 2– stronger safeguards needed

- 3. Billing:** eg customer's right to an accurate bill, strengthen rules on back billing.
- 4. Prepay:** eg information on location and accessibility of smart meters should be available to new supplier on change of company, consumers should be offered a range of top up options, ban security deposits.
- 5. Data protection and privacy:** new guidelines/rules, eg

Privacy Charter available to consumers.

Customers can easily change the amount of data they share.

Customer can share data with accredited third parties if they wish.

Opt in to share more detail than is needed for basic energy supply – what is consent?

Customer complaints up:

'Customer has a smart meter but is still receiving estimate bills has lodged a complaint but with no satisfactory resolution' 19/08/2010

'Customer previously had estimated bills and a smart meter was installed giving accurate readings. Supplier x now says they have to pay a catch up bill of £1700 or they will disconnect.'
12/08/2010

From Consumer Direct contacts

Post installation 3 – stronger safeguards needed

- 6. Quick & efficient complaint handling & redress:** who responsible? Where do customers go if energy services not energy supply? Energy Ombudsman does not cover wider services, little transparency in complaint handling.
- 7. Customer engagement:** dedicated hotline? Mandatory follow-up call to check if happy or any questions?
- 8. Cost:** not passed on to individual consumers. No higher tariffs, no up front costs.
- 9. Switching:** customer is able to switch supplier without having to change meter or display. There is no lock-in to the supplier that installed the meter. New rules about long term contracts.

Low income & vulnerable consumers

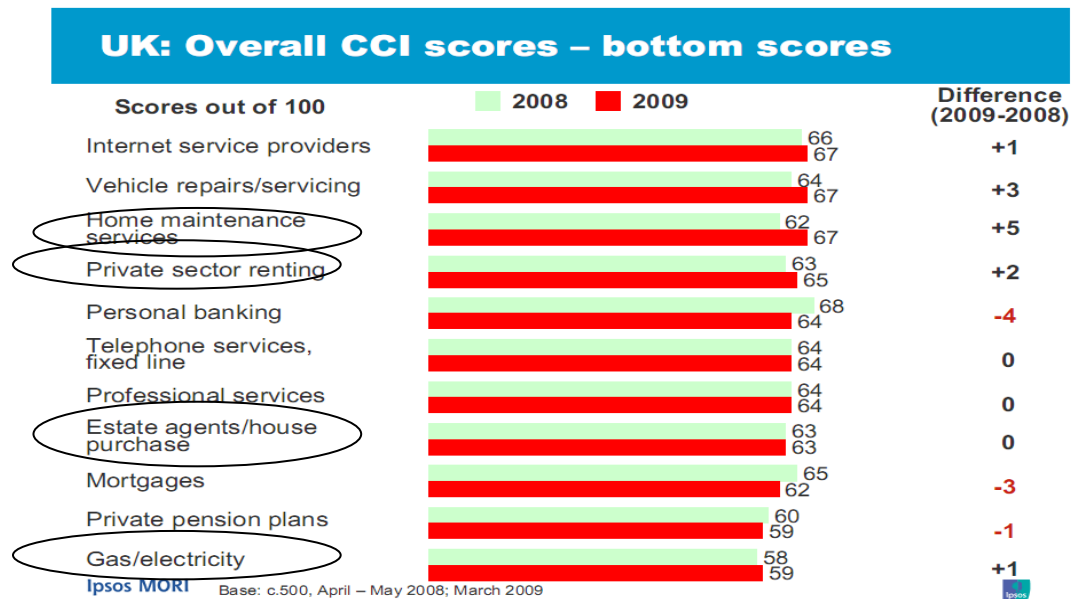
More work needed on how installation can be used to:

- Identify and reach vulnerable consumers
- Deliver help and assistance to those struggling to afford to heat their homes
- Ensure all consumers get the benefits of smart metering

ICOP is not a substitute for improvements in licence conditions

Lastly, a reminder..

Our [Consumer Conditions survey](#) 2009 compared consumers' ratings of 45 markets on the basis of choice, meeting of expectations, consumer rights, trustworthiness, and the comparability of quality and prices (CF, 2009a). Energy was among the worst.



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