



SMDG Community of Technical Experts, Disability Advisory Forum, consumer groups and other interested parties

*Promoting choice and value for all gas and electricity customers*

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Date: 14 December 2010

Dear Sir/Madam

### **Smart Metering Implementation Programme - Inclusivity by Design Information Request**

On 27 July 2010, the Department of Energy and Climate Change (DECC) and Ofgem published jointly a Prospectus containing proposals for the delivery of electricity and gas smart metering in Great Britain.<sup>1</sup> This covers both domestic households and small and medium non-domestic sites.

As noted in the Prospectus, Welsh language provisions<sup>2</sup> and arrangements for consumers with specific requirements<sup>3</sup> are being considered by the programme. We are asking for information on smart metering features which will assist different groups in accessing smart metering technology. We are particularly interested in the costs and benefits of embedding such features in the design of smart metering systems ("inclusivity by design").

We are seeking information on the difference in costs and benefits (the marginal or "extra" costs and benefits) for each feature under each of the following three options:

1. **Universally mandated:** All IHDs and meters are mandated to be inclusive by design (e.g. reflected in minimum specifications);
2. **Mandatory on request:** Requirement to provide suitable equipment for relevant users (e.g. larger screen IHDs for partially-sighted consumers); or
3. **No mandate:** Leave suppliers to determine the appropriate way to meet the needs of relevant users.

This information will help the government to reach an appropriate evidence-based decision on which of the three options is the appropriate way to proceed in relation to each feature.

When responding, please pay close attention to the different types of costs and how they affect the overall burden. For example, a particular feature provided universally may incur

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<sup>1</sup> The Prospectus can be found on the Ofgem website:

<http://www.ofgem.gov.uk/e-serve/sm/Documentation/Documents1/Smart%20metering%20-%20Prospectus.pdf>

<sup>2</sup> See Statement of Design Requirements supporting document, page 61, <http://www.ofgem.gov.uk/e-serve/sm/Documentation/Documents1/Smart%20metering%20-%20Statement%20of%20Design%20Requirements.pdf>

<sup>3</sup> See In-home Display supporting document, page 11, <http://www.ofgem.gov.uk/e-serve/sm/Documentation/Documents1/Smart%20metering%20-%20In-Home%20Display.pdf>

an additional upfront production cost, but it may remove larger administration costs that would exist under a mandatory on request or non-mandatory option e.g. the cost of customer services staff and facilities to organise provision on demand. Some features may not carry any or only minimal extra costs, for example software which may be programmable in different languages.

We are specifically looking at Welsh language and disability/accessibility design features. Further context for these areas is provided below:

### ***Welsh Language Design Features***

As public authorities, Ofgem and DECC are under a legal obligation under the Welsh Language Act 1993 to take measures, so far as is both appropriate in the circumstances and reasonably practicable, to treat the English and Welsh languages equally in Wales in the conduct of public business.

In order to determine what is appropriate and reasonably practicable in these circumstances, we are looking to evaluate the marginal costs and benefits associated with providing Welsh language functional IHDs and meters.

### ***Disability/Accessibility Design Features***

As public authorities, Ofgem and DECC have a statutory obligation to have due regard to the need to promote equality of opportunity between disabled persons and other persons and the need to take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably.

We have also listened to stakeholders' input, including Ofgem's Disability Advisory Forum, on the benefits of inclusivity by design. We acknowledge that disability/accessibility features can benefit other users even where they do not have any particular disability. We are seeking to better understand these benefits to balance them against any extra associated costs.

Please note that we are aware the minimum specifications for the smart metering system (e.g. IHD, meter etc) do not require the display of "text messages." However, we understand that some solutions may display textual information in either fixed or variable format or both.

### **Information Request**

This document contains a proforma summary table which we ask stakeholders to use to set out responses and their underlying assumptions. This letter and relevant excel tables are also available on the Ofgem website [here](#). Please feel free to submit any supporting documentation along with the completed table. We particularly welcome quantitative information but will also consider qualitative where provided.

**The deadline for responses to this information request is 31 December.** If you have any questions or requests for clarification, please send them directly to [SMDG@ofgem.gov.uk](mailto:SMDG@ofgem.gov.uk).

Yours sincerely,

**Adrian Rudd**  
**Smart Metering**  
**E-Serve, Ofgem**

## A. Information request templates – Welsh Language Design Features - Options

(These templates are also available in spreadsheet format)

Details of the Person Providing Information on the Welsh Language Design Options:

Name:	
Organisation:	
Contact details:	
In what capacity are you providing this information? (please delete as appropriate):	On behalf of organisation / personal opinion

	No.	Option	Development Cost	Equipment Cost	Administration Cost	Benefits	Assumptions	Comments
<b>ON REQUEST OPTIONS</b>	1	Provide Welsh language functionality for IHDs / meters installed anywhere in Great Britain if requested						
	2	Provide Welsh language functionality for IHDs / meters installed in Wales if requested						
<b>UNIVERSAL OPTIONS</b>	3	Provide Welsh language functionality for all IHDs / meters installed in Great Britain						
	4	Provide Welsh language functionality for all IHDs / meters installed in Wales						

**All costing information should:**

Exclude VAT;

Be based on expected costs/prices in 2010;

Not make any assumptions about inflation, i.e. costs should be in constant 2010 pounds;

Ideally be provided in the form of range estimates (min-max), or provide some other measure of uncertainty.

N.B. Given the novelty of smart metering technology, it may be necessary to estimate costs by analogy to other technology with facilities for multi-lingual operation (for example SatNavs or mobile phones etc.).

**Definitions**

Development Cost - additional cost, if any, of developing the feature

Equipment Cost - additional cost, if any, of the equipment (with volume assumption)

Administration Cost - additional cost, if any, of administering the provision of the relevant feature to consumers

Assumptions - the underlying assumptions in terms of volumes, unit costs and any other variable

Benefits - the benefits associated with the option

Comments - free text field to provide comments or links to other documents

## B. Information request templates – Disability/Accessibility Design Features - Options

(These templates are also available in spreadsheet format)

Details of the Person Providing Information on the Disability/Accessibility Design Features Options:

Name:	
Organisation:	
Contact details:	
In what capacity are you providing this information? (please delete as appropriate):	On behalf of organisation / personal opinion

No.	Option	Development Cost	Equipment Cost	Administration Cost	Benefits	Assumptions	Comments
1	Large and tactile buttons (e.g. distinguishable by touch, please specify any design guidelines, standards referenced and any variable costs associated with different design options)						
2	Large screen and font size (please specify sizes and any design guidelines, standards referenced and any variable costs associated with different sizes)						
4	Ability to enhance display contrast (please specify values / details and any design guidelines, standards referenced and any variable costs associated with design options)						
5	Audio output (please specify any design guidelines, standards etc)						
6	Wall mounted IHD (e.g. accessible for wheelchair users; a common/memorable place for blind/partially sighted consumers etc.)						
7	Other [Please feel free to add other inclusive design options and analysis if not adequately covered by the options above]						

**All costing information should:**

Exclude VAT;

Be based on expected costs/prices in 2010;

Not make any assumptions about inflation, i.e. costs should be in constant 2010 pounds;

Ideally be provided in the form of range estimates (min-max), or provide some other measure of uncertainty.

N.B. Given the novelty of smart metering technology, it may be necessary to estimate costs by analogy to other technology with facilities for operation by disabled consumers (for example large button phones, speaking alarm clocks etc.).

**Definitions**

Development Cost - additional cost, if any, of developing the feature

Equipment Cost - additional cost, if any, of the equipment (with volume assumption)

Administration Cost - additional cost, if any, of administering the provision of the relevant feature to consumers

Assumptions - the underlying assumptions in terms of volumes, unit costs and any other variable

Benefits - the benefits associated with the option

Comments - free text field to provide comments or links to other documents