



**Consumer
Focus**

Campaigning for a fair deal

Consumer Focus response to Smart Metering Implementation Programme: In-Home Display

October 2010

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About Consumer Focus

Consumer Focus is the statutory consumer champion for England, Wales, Scotland and (for postal consumers) Northern Ireland. We were formed by The Consumers, Estate Agents and Redress (CEAR) Act 2007.

We operate across the whole of the economy, persuading businesses, public services and policy makers to put consumers at the heart of what they do.

Consumer Focus tackles the issues that matter to consumers, and aims to give people a stronger voice. We don't just draw attention to problems – we work with consumers and with a range of organisations to champion creative solutions that make a difference to consumers' lives.

Consumer Focus has strong legislative powers. These include the right to investigate **any** consumer complaint if they are of wider interest, the right to open up information from providers, the power to conduct research and the ability to make an official super-complaint about failing services.

We receive about a third of our funding from BIS. Funding also comes from licenses paid by energy suppliers and the postal industry. We are also able to raise our own funds – for example, through externally funded projects.

Overview

Consumer Focus believes that further consultation is needed before minimum standards are finalised and decisions are made around how these standards are applied in practice. Minimum display requirements will be needed for:

- Information provision
- Customer usability
- Functionality including interoperability between suppliers

In particular, greater consideration is required around of the display needs of:

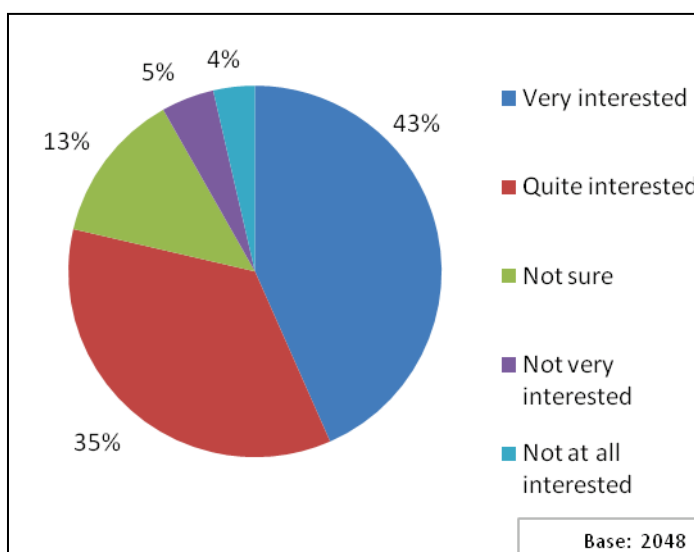
- Current and future prepayment or pay as you go users
- Current and future Time of Use (TOU) tariff customers
- Vulnerable consumers and those with special requirements

We recognise the challenges of accommodating high levels of functionality for displays alongside the need for it to be simple, cost effective and easy for all customers to use. But we believe that the right balance can and needs to be achieved. Any minimum standards should be reviewed on an annual basis to keep pace with technological change and ensure that customers are not receiving outdated displays which are no longer fit for purpose.

Mandating the IHD

Consumer Focus welcomes the proposal to mandate the provision of a standalone in-home display (IHD) with minimum standards – this is something we have consistently campaigned for. Our March 2010 survey¹ found that 79 per cent of people are interested in having an energy display which shows information such as ‘how much energy you are using, how much this is costing you, carbon emissions and previous energy usage’.

Figure 1 How interested would you be in having a display that showed you this kind of energy information?

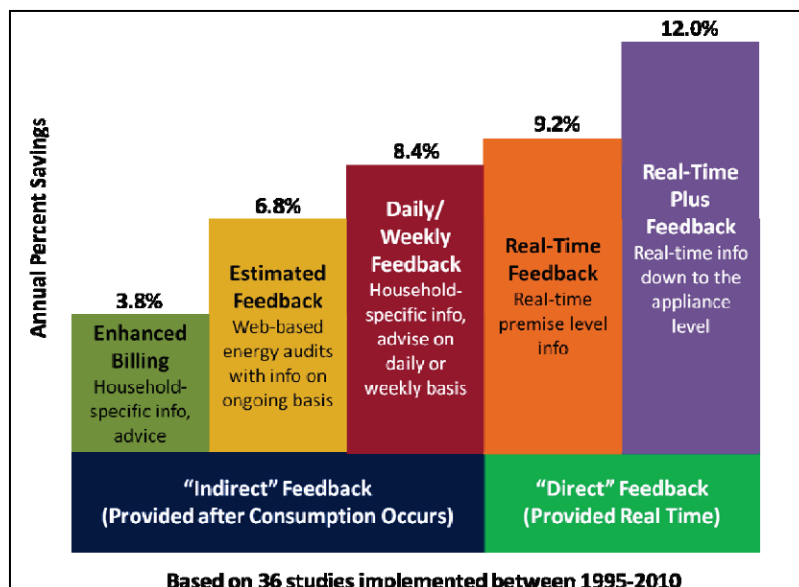


¹ This was an online Omnibus survey of 2,048 consumers aged over 18 years conducted by ICM on behalf of Consumer Focus. Full findings will be available in January 2011.

International evidence, including British trials, concludes that real-time displays are a key tool to help consumers realise energy reductions from smart metering. The American Council for an Energy-Efficient Economy (ACEEE) reviewed more than 36 residential smart metering and feedback programmes internationally. This is the most extensive study of its kind. Their conclusion was: ‘To realise potential feedback-induced savings, advanced [smart] meters must be used in conjunction with in-home (or on-line) displays and well-designed programmes that successfully inform, engage, empower and motivate people’. Figure 2 below, taken from their recent report, illustrates this point².

Mandating an IHD is particularly important given that £4.23 billion of customer benefits identified in the Impact Assessment³ (IA) are expected to come from households reducing their energy use as a result of up to date energy consumption information. Another £1.06 billion is expected to come from load shifting/TOU tariffs, for which the IHD will also be important.

Figure 2 Average Household Electricity Savings (4-12%) by Feedback Type



Standalone display

We welcome the continued commitment to the provision of a standalone display rather than online or mobile alternatives, given the importance of customer energy reduction. Consumer Focus research (March 2010) found that the vast majority of people thought they were more likely to look at a portable display when they were at home rather than the internet, TV, their mobile or other media to find out how much energy they were using⁴. This is also supported by some of the Energy Demand Research Project trials.

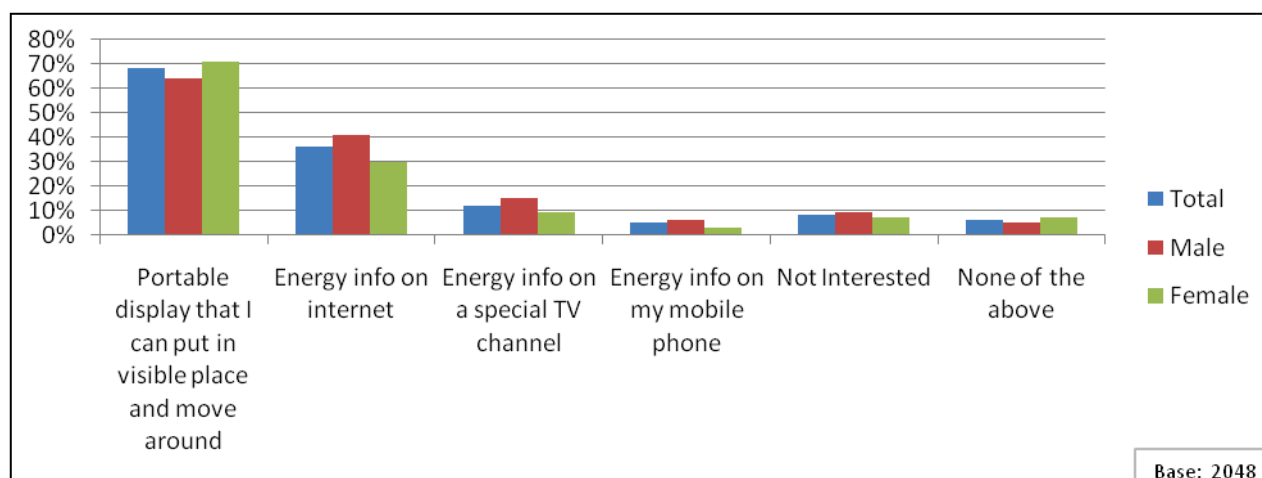
² ACEEE Advanced Metering Initiatives and Residential Feedback Programmes (2010).

<http://bit.ly/dphPoX>

³ GB-wide smart meter roll out for the domestic sector. 27.10.2010. IA No: DEC0009. Impact Assessment <http://bit.ly/c4vaQX>, page 2

⁴ This was an online Omnibus survey of 2,048 consumers aged over 18 years conducted by ICM on behalf of Consumer Focus. Full findings will be available in January 2011.

Figure 3 Which of the following do you think you would be most likely to look at when you are at home, to find out how much energy you are using?



NB. This was an online survey, so we would expect, if anything for it to over-represent preference for the internet.

A physical display can also act as a reminder to customers to take action and has the advantage that it can be easily accessed by all members of the family. Almost a third of all households (28 per cent) do not have an internet connection in their home⁵, and 8 per cent do not have access to a mobile phone⁶, so would be unable to take advantage of energy use information via these media.

Minimum standards

Consumer Focus welcomes the decision to set minimum standards for displays. This is essential to ensure that all customers, regardless of income or 'buying power' receive a high-quality display and can access the information they need to realise some of the benefits of smart-metering. This is particularly important where all consumers are expected to pay for rollout.

We believe that the mandating of a display does not preclude company innovation and customer choice. We would expect suppliers to offer a variety of online, mobile, and TV based energy efficiency services in addition to the IHD. We are mindful however, that there may be limited commercial incentive for suppliers to go 'above and beyond' minimum requirements for any 'free display' when they can charge an additional sum for extra functionality on a different one.

In order to engage all customer segments and all household members it will be necessary to provide energy efficiency information and data in a variety of formats (from pounds to penguins), via a range of media (mobile phones, internet, hard copy information etc). Consumer Focus therefore sees great value in a flexible approach underpinned by a separate IHD with high quality minimum standards.

⁵ <http://bit.ly/aE2W5v>, page 350

⁶ Ibid, page 334

Cost of the display and longer-term contracts

We seek clarification that suppliers will be obliged to offer a display which has no direct cost to the customer – be that via an upfront charge at the point of installation or subsequently via a higher cost tariff. Consumer Focus believes that the cost of this mandated display should be spread across the whole customer base. This is particularly important as our research shows that 15 per cent of people who said they were not interested in a display, did so because they were worried about it costing them money⁷.

We recognise that some customers may decide to pay extra for additional functionality or choice of display – whether an upfront amount, or entering into a longer term contract with their supplier. Ofgem needs to give further consideration to when this can be offered to the customer (eg pre, during or post installation visit) given concerns around sales during the home visit. Ofgem also needs to take steps to ensure customers are aware of the implications of locking themselves into a longer-term contract for such an essential service and have the information they need to make an informed purchasing decision.

Lessons should be learnt from the problems customers have experienced with longer-term contracts in the mobile phone sector.⁸

Micro-businesses

Consumer Focus believes that suppliers should also be mandated to offer a standalone display to micro-businesses; on the same basis as to domestic customers given that the motives for mandating smart meters in both markets are broadly similar.

The decision to require all suppliers to at least make available near real-time energy consumption information via the home area network (HAN) is a step in the right direction as Consumer Focus's information request found that several suppliers did not provide online data access. But for this to work, it has to be available at no direct cost for micro-businesses. Our recent information request to suppliers⁹ also found that several suppliers charged up to 51p a day to access information online.

⁷ This was an online Omnibus survey of 2,048 consumers aged over 18 years conducted by ICM on behalf of Consumer Focus. Full findings will be available in January 2011.

⁸ Consumer Focus is concerned about the increasing numbers of long-term contracts in the mobile phone sector. 24 month contracts now make up 63 per cent of all new mobile contracts (this has increased from 2 per cent of contracts in Q1 2008). A corresponding fall has taken place in 18 month contracts over the same period, from 72 per cent to 12 per cent. Source: Consumer Focus briefing, based on Ofcom's *Communications Market Report* 2010: <http://bit.ly/b33jWN> (briefing available on request). This trend toward longer contracts is not beneficial for consumers:

- Longer contracts typically offer customers cheaper up-front charges and lower monthly tariffs, but can be significantly more expensive over the life of the contract
- Longer contracts limit consumers' ability to switch, putting a brake on competition in the market
- The dominance of two-year contracts limits consumers' options for financing their mobile package in the way that suits them best. For example, consumers are very restricted in their choice of 12 month contracts involving higher up-front costs, though this is an option that may suit some people

⁹ Consumer Focus informal information request to energy suppliers on 'Information relating to the roll-out of smart metering to small businesses and micro businesses', 24 May 2010. Consumer Focus asked energy suppliers how many smart/advanced meters they had supplied or were planning to supply in the next few years, as well as details of their functionality/installation procedures. The market extent of gas valves and standalone displays, whether there were charges for data reading and the types of tariffs offered were all collated. The request was sent to the following suppliers: BES Gas, BGB, Contract Natural Gas, E.ON, EDF Energy, First Utility, npower, Opus, Scottish Power, Shell Gas, SSE, Total Gas and Power, and Utility Warehouse.

Not only do we struggle to see how this could be cost-reflective, it also acts as a barrier to small businesses taking action to reduce their energy use. Such arrangements should not be allowed to continue in the transition to smart or the process could be perceived to be a burden on businesses, rather than an opportunity to reduce their energy spend and cut costs.

Complaint handling and customer redress

To ensure consumer confidence, clear, straight-forward redress mechanisms need to be in place. We seek clarification from Ofgem as to where consumers will be able to go to complain and obtain redress for issues related to their IHD. The existing licence conditions on the supply of energy do not cover the provision of services or products. Would consumers be able to turn to sources such as the Energy Ombudsman, or Consumer Focus' Extra Help Unit?

It is essential that the redress mechanisms for energy consumers remain joined up and seamless, even as the market grows more complex.

Going forward

As this technology develops and prices fall, we ask Ofgem to keep under review the possibility of adding other functions to the IHD to improve consumer engagement (ie the 'stickyness factor'¹⁰). This could include boiler controls, which have been shown to significantly increase levels of consumer engagement with their IHD and reduce energy consumption. We also expect that the introduction of TOU tariffs will increase consumer use of their separate in home display.

Making IHDs future-proof

It is also important that IHDs are as future proof as possible, for example by leaving enough memory space for future software updates etc. This may help save consumers' money and environmental resource in the future rather than replacing their whole display.

¹⁰ 'Stickyness' in this context refers to ways of making consumers use their IHD more regularly, or for a longer period. An example could be adding boiler controls to an IHD

Consultation questions

Question 1: We welcome views on the level of accuracy which can be achieved and which customers would expect, in particular in relation to consumption in pounds and pence

Information on current consumption displayed in pounds and pence and bills

1.1 Consumer Focus welcomes Ofgem's intention for IHDs to show information on current consumption in pounds and pence. Presenting information on usage in this manner has been demonstrated¹¹ to be much more meaningful to consumers than kWhs, helping people to understand how their consumption translates in actual expenditure.

1.2 The Prospectus states that the cost shown in pounds and pence won't match up exactly to the bill, because of; 'the existence of standing charges, discounts and ad hoc charges'. This means that in all likelihood, by the time that standing and other charges are added, the consumer will be asked to pay more or a different amount than the amount shown on their IHD.

1.3 We recognise that addressing this issue presents challenges to suppliers, particularly in the case of gas customers. However, Consumer Focus believes it is crucial that every step is taken to ensure that customers are able to reconcile the information on their energy bill with the information on their display. Customers must not be faced with any unexpectedly high bills and should still be able to use their displays to budget easily. Failure to do this will result in increased customer confusion, customer dissatisfaction and increased call volumes to customer service lines.

1.4 We question Ofgem's statement in the consultation document that consumers will be happy with 'indicative' figures. We seek clarity from Ofgem as to how significant the discrepancy will be between the usage information shown on the IHD, and actual bill – a difference of a few pence may be acceptable but is important to remember that some consumers, particularly those on low incomes, often budget extremely carefully. We are concerned that, for these groups, a difference of even a few pounds that was not planned for in a weekly, monthly or quarterly budget can cause detriment.¹²

1.5 It is unclear if the Green Deal charge will be shown on the display, if it is not then the discrepancy between the display and the bill could be substantial and unacceptable.

¹¹ *The smart way to display. Exploring consumer preferences for home energy IHD functionality.* A report for the Energy Saving Trust by the Centre for Sustainable Energy. One of the key design principles developed as a result of the focus groups was 'Everyone understands money. Watts, kilowatts and especially kilowatt-hours will never be universally understood or accepted as units of energy consumption. Money offers a straightforward alternative for both rate of consumption and historic consumption'. page 2

¹² It is estimated that in 2008/09, 13½ million people in the UK were living in households below the low-income threshold, defined as £119 per week for single adult with no dependent children; £206 per week for a couple with no dependent children. Source: <http://bit.ly/a986Kq>. For a single person living on Jobseekers allowance, that maximum weekly contribution-based payment is £65.45. <http://bit.ly/coroU6>. By the time that they have paid for food, transport and utility bills and other essentials, it is clear that a few pounds could make a difference.

1.6 An explanation for any discrepancy (and we are not convinced that this discrepancy is necessary) would need to be clearly communicated. Consumer Focus suggests that Ofgem gives consideration to communicating an explanation of this difference in cost to consumers, by the following means:

- Via a message which appears on the IHD explaining that the amount does not include standing and other charges
- Via information on the consumer's bill
- As part of the verbal advice to consumers during the installation visit and included in the smart meter pack and other information left with consumers

1.7 Providing information about this discrepancy was recommended by a recent report¹³ commissioned by Ofgem from FDS International. Suppliers must make every effort to present accurate information on energy usage via IHDs in a way that is accessible to all consumers.

Current account balance

1.8 Consumer Focus expects that as far as possible, the current account balance on the display should be the final amount that the consumer owes, with standing charges, and any other charges including the Green Deal charge, also fuel direct payments and other discounts included. We are not aware of any technical barriers to this being delivered.

1.9 We seek clarification as to why the IHD cannot provide accurate account balance information in near real-time for debit customers, not just every month, when the suggestion in the Prospectus is that it can be done for prepayment meter (PPM) customers. As prepay develops it is likely that customers will use a mixture of Direct Debit and cash and cheque payments alongside top-ups, as needed, and the distinction between payment types is likely to blur. Consumer Focus believes that the customer being able to find out how much they owe in pounds and pence should be a fundamental requirement.

1.10 Account and tariff information should be clearly presented and easy to find. It is noted in the Prospectus that prepayment customers already receive this information on their meter. This is the case but in practice displays are so poorly designed that our research found that none of the people we spoke to used this information. For example, we understand that, on Quantum PPM meters, the consumer has to press a button over 30 times to access account information. In our recent qualitative research into attitudes toward prepayment¹⁴, none of those interviewed were aware that this information was available on their meter. This reinforces the importance of the displays being simple to use and key information on the amount owing being within a small number of clicks.

¹³ *Consumers' views of Smart Metering*, report by FDS International for Ofgem, July 2010, <http://bit.ly/alcMhb>, page viii. The report presents the findings of 12 focus groups and 10 family groups which explored, '...customers' requirements, hopes and concerns regarding smart energy meters'. The recommendation was that: 'Instructions will also need to explain why the pounds figure on the display may not tie in perfectly with their bill'.

¹⁴ *Cutting back, cutting down, cutting off, Self-disconnection among prepayment meter users*. Consumer Focus, July 2010, <http://consumerfocus.org.uk/g/4lx>. Page 12. This is the biggest ever study of PPM energy customers. The study explored attitudes to this payment method, and the extent to which PPM customers self-ration or self-disconnect.

1.11 Consumer Focus is keen that lessons are learnt from PPM displays rather than repeating existing mistakes. As well as mandating minimum requirements for IHD functionality, Consumer Focus believes that displays should have to pass some kind of consumer usability test and meet inclusivity by design standards. The experiences of PPM users, and those of many customers when trying to set their boiler controls, are reminders that mandating functionality alone is not enough to ensure that consumers can access the information they need and use the technology effectively.

Real-time information on electricity consumption

1.12 We support a requirement that electricity IHDs provide real-time information where technically feasible. Where this cannot be achieved, clarification must be given as to why this is the case and this decision should be reviewed at least annually as technology evolves. Figure 2 above highlights that where real time information is provided that customer energy savings increase. It may also be that a generation of multi-media users who are used to immediate feedback are less likely to engage with their display if there is a delay – more analysis needs to be carried out on this. Certainly customers with clip-on electricity displays would not expect a decline in service.

1.13 The consultation reports that there are constraints around the availability of technological solutions for real-time information. We have heard mixed reports from manufacturers as to whether this is really the case. Some have suggested that the issue could be bypassed if the IHD were mains connected, or had a rechargeable battery. We understand that suppliers are preparing a paper for Ofgem explaining the business case for updating the IHD every 10 seconds. We suggest that Ofgem consults independent, impartial sources before taking a final decision on this and properly investigates the implications in terms of realising the consumer benefits.

Real-time information on gas consumption

1.14 Consumer Focus does not have the technical expertise and therefore we can't directly comment on whether updating the IHD more often than every 15 minutes for gas consumption would lead to the meter battery being run down prematurely. As with above, more research is needed to understand the impact of delayed updates on customer engagement and behaviour change.

Question 2: We welcome evidence on whether information on carbon dioxide emissions is a useful indicator in encouraging behaviour change

2.1 Anecdotal feedback from smart meter rollout in Denmark suggests that a relatively small but important customer segment is motivated by a desire to tackle climate change and 'do the right thing'. But evidence from other markets suggests that CO₂ is not a metric that is currently widely understood by consumers¹⁵. However, we would urge Ofgem not to dismiss this functionality completely. We are mindful that Navetas's research showed a consumer interest in this information, with 31 per cent of customers quite interested in having CO₂ information on their displays and 15 per cent very interested¹⁶. There may also be benefits in terms of raising consumer awareness of carbon emissions if this were included. If carbon dioxide emissions are included, we would not expect this to be on the first two screens. If it is not included, we ask Ofgem to review this on a yearly basis as developments such as personal carbon allowances could significantly alter this.

¹⁵ ANEC R&T 2010 Env 003 June 2010

¹⁶ Navetas Smart Meter Evaluation May 2010. Prepared by Optimisa Research

Question 3: We welcome views on the issues with establishing the settings for ambient feedback

3.1 We welcome the inclusion of a visual presentation to allow consumers to distinguish between high and low consumption. This has the following benefits:

- Help ensure accessibility of displays for consumers with low literacy or numeracy. Recent research from Sheffield University found that 22 per cent of 16 to 19-year-olds in England are functionally innumerate, and 17 per cent of 16 to 19-year-olds are functionally illiterate¹⁷
- Alert consumers with a PPM that their credit was running low
- Alert customers with TOU tariffs to a change of charging rate
- Customers are alerted at a distance if devices are left switched on or they need to reduce their energy use

3.2 Regarding the calibration of ambient feedback settings, Ofgem's consumer research¹⁸ suggested that if the settings were too high or too low the feedback could become meaningless. Consumer Focus agrees that care will need to be taken in this regard. Inappropriate settings could also have unintended consequences. NEA Warm Plan trials reportedly found that when benchmarks were set to an average, low users actually increased their energy consumption to this level. While this may be welcome if the customer was under-heating their home, it might not be the desired outcome if it leads to more profligate energy use. Certainly, Consumer Focus believes that the settings would have to be adapted for any household that has electricity as their primary heating source.

3.3 Consumer Focus research on billing (October 2010) indicates that consumers are interested in more personalised feedback which is adapted to their own energy consumption. If the information consumers receive via their IHD is meaningful, it is arguably more likely to prompt behaviour change, and therefore deliver the cost savings set out in the Impact Assessment (IA).¹⁹

3.4 We are also aware that at least two IHDs under production 'learn' about the way consumers use energy and profile their typical consumption. The alert for high/low consumption can then be personalised to reflect the household's use.²⁰ We would urge Ofgem to investigate the cost/benefits of this functionality.

3.5 We share concerns that certain types of ambient feedback, such as red light to show high usage, could prompt elderly/vulnerable low income groups to under-heat their homes putting their health in danger. But we are unaware of any evidence to support this, and therefore urge Ofgem to investigate this further. As part of the research, Ofgem should also investigate the feasibility of a function that allows the disabling of the ambient feedback option.

¹⁷ <http://bit.ly/b3IMFX>. Functionally innumerate is defined as: '...maths skills are limited to little more than basic arithmetic', functionally illiterate is defined as: '...they cannot handle much more than straightforward questions'.

¹⁸ *Consumers' views of Smart Metering*, report by FDS International for Ofgem, July 2010, <http://bit.ly/alcMhb>, page 20

¹⁹ *GB-wide smart meter roll out for the domestic sector*. 27.10.2010. IA No: DEC0009. Impact Assessment <http://bit.ly/c4vaQX>

²⁰ Consumer Focus recently commissioned a series of focus groups (run by Ipsos MORI) with six groups of consumers, to discuss attitudes to information on bills, including comparative consumption information. The initial findings showed a general consensus was that, for information on consumption to be meaningful, it needed to reflect the consumer's usage, and not compare their consumption to that of others, as everyone's individual circumstances were different. The full findings of the research will be published in December 2010.

3.6 During the installation visit, suppliers should be obliged to explain to customers, especially those identified as vulnerable, the importance of maintaining an adequate heating regime for health and well being. Our view on this and further protections are outlined in Consumer Focus's response to the Protections document and Question 13 on the Installation Code of Practice.

Question 4: Do you think that there is a case for a supply licence obligation around the need for appropriately designed IHDs to be provided to customers with special requirements, and/or for best practice to be identified and shared once suppliers start to roll out IHDs?

4.1 Consumer Focus supports the proposal for a licence condition which obliges suppliers to not only a) ensure that all customers are offered, at no additional cost, an appropriately designed IHD, where their needs will not be met with the standard display but also b) that they use displays which meet 'inclusivity by design principles' and an agreed usability standard²¹. Our rationale is as follows:

- Experience in other markets, such as with central heating programmers²² suggests that where there is no mandate, that the competitive market is slow to meet the needs of vulnerable and disabled consumers. The Research Institute for Consumer Affairs (Ricability)²³ has confirmed that their testing work done over the last 25 years consistently shows that mainstream electrical displays do not meet the needs of many older or disabled consumers – whether washing machines, digital radios or mobile phones. When this is left to the market, Ricability has found that companies tend to buy cheaper components, leading to small, poor quality displays
- Rather than hindering innovation, a licence condition that obliges suppliers to meet 'inclusivity by design' principles, or ensure displays meet the needs of disabled customers or those with special needs, could help stimulate growth in a new market where experience suggests there may not be the initial commercial drivers for development
- Evidence suggests that inclusive design could reduce the cost overall of providing special displays to meet the needs of certain consumers. The Government has stated it believes that inclusive design saves money. The eAccessibility Action Plan²⁴, recently published by the Department for Business Innovation and Skills (BIS) is wholly focused on an inclusive design approach to technology. Ed Vaizey MP, Minister for Culture, Communications and Creative Industries states in the action plan that inclusive design is vital to reach a wider share of the market and improve profitability, and will even help a move towards the Big Society²⁵.

²¹ For more information about inclusive design, see <http://bit.ly/ac9BtL>. For case studies of how inclusive design has worked well in other sectors, see <http://bit.ly/9F2mQZ>.

²² The Research Institute for Consumer Affairs (Ricability) carried out work in 2004 which found that central heating programmers' displays were not meeting the needs of older and disabled users. The findings of their work can be found here: <http://bit.ly/bSngUe>.

²³ Ricability is an independent consumer research charity providing free, practical and unbiased reports for older and disabled people. It carries out research and publishes information to enable disabled and older people to live independently. For more information, see: <http://bit.ly/bXPwp0>.

²⁴ <http://bit.ly/cn59vY> published by BIS in October 2010.

²⁵ Ibid, page 25 'It is essential that mainstream products and services adopt the principles of inclusive design, particularly within the technology sector as its implementation will facilitate the social inclusion and mobility that will lead to the Big Society'

The action plan states that: '[the] principles of Inclusive Design should be adopted by the widest number of organisations possible when they design, develop and deliver products, platforms and services to the marketplace'²⁶

- We suggest that Ofgem and companies work closely with this BIS digital team to share learning. An example of low impact on cost of inclusive design is the development of the Mira Advance Flex shower, which can be used by people with limited hand movements, 'The additional costs of all this at most amounted to under 10 per cent of total development costs, and was considered to be a sound investment. They expect the product to appeal to a wide range of people and would expect development costs to be recouped in two years'²⁷
- Suppliers would still be able to go above and beyond the minimum requirements set out in the licence condition to demonstrate innovation and would be able to provide greater choice of displays at an additional cost for those able to pay
- There are millions of consumers – who might not identify themselves as disabled or with special needs – who would benefit from the inclusivity by design principles, eg large screen and font size, large and tactile buttons, feedback in plain English etc. For example, people with poor sight²⁸ or older people with declining dexterity
- For consumers with very specialised requirements, suppliers would be able to offer a highly specialised display. We anticipate that these would only need to be provided in relatively small quantities, as the majority of consumers would be able to use the inclusive IHD
- A licence condition is in line with Ofgem's duty to have regard to 'the interests of individuals who are disabled or chronically sick, of pensionable age, with low incomes, or residing in rural areas'
- A licence condition would also help meet the ERGEG draft best practice recommendation for regulators that, 'All customers should benefit from smart metering'²⁹

Further views

- We support the proposal that customers should have a choice in where their display is located and that they should be provided with an IHD which is easy for them to use
- We support the proposal for suppliers to share best practice in relation to extra help and support for consumers with special requirements
- Consumer Focus believes that, as a minimum, all displays should meet a 'usability standard' before they can be provided as part of the mandated roll out – preferably including inclusivity by design. This should include market testing where consumers actually use the IHD
- Ongoing customer difficulties in using PPM displays and historic problems with boiler controls are a reminder of the need for displays to meet usability standards. A well-designed IHD that is intuitive to use will also result in lower contact volumes to call centres, and ultimately in higher customer satisfaction

²⁶ Ibid, page 3

²⁷ More information about the development of the Mira Advance Flex thermostatic shower controls is available, by scrolling down the page: <http://bit.ly/9ZCksz>

²⁸ There are reportedly two million blind and partially sighted people in the UK suggesting a substantial number would benefit from this approach <http://bit.ly/95dfeJ>

²⁹ An ERGEG Public Consultation Paper on *Draft Guidelines of Good Practice on Regulatory Aspects of Smart Metering for Electricity and Gas*, Ref: E10-RMF-23-03, 10 June 2010, Recommendation 15.

- Consumer Focus urges Ofgem to carry out research to consider the needs of customers with special requirements and to conduct a cost benefit exercise on inclusivity by design principles. We would welcome working with Ofgem and other members of the Disability Advisory Panel on this. We also recommend that Ofgem investigates how easy it is for the standard IHD to be updated with the software to include an electronic voice. A voice might also be helpful for older people or those with low literacy.

Question 5 We welcome evidence on whether portability of IHDs has a significant impact on consumer behavioural change

5.1 Consumer Focus has not carried out our own research on the difference between portable and static displays on behaviour change but recommend that Ofgem see if this comparison information is available from the ACEEE's international study mentioned above³⁰. However, we intend to do some research around customer preference for static versus portable displays which will help to inform our view in this area.

5.2 On the basis of current evidence, subject to a proper cost/benefit analysis, we support the recommendation by the Energy Savings Trust (EST) that IHDs should be mains powered, with an internal battery, allowing consumers to recharge the IHD and then move it around the home as needed, like a cordless phone³¹. This would meet the recommendation from the Ofgem focus group for some kind of portable display³². Having an inbuilt battery also overcomes issues around batteries not being replaced once they run out, or being removed and used in other appliances, as happens currently with smoke alarms.

5.3 Anecdotal reports from industry trials suggest that in the initial period, consumers are often very enthusiastic about their new IHD, and tend to move around the house with it, watching what effect turning on and off different appliances has on their overall consumption, but after a few months it tends to find a resting place, normally in the kitchen. We do have concerns that, for a mains powered display, low availability of sockets, especially in low income households, might also lead to it being refused or put somewhere which is less visible, and therefore less likely to be used – so portability with mains power also addresses this. We recommend that further research is undertaken if evidence presented in response to this consultation is inconclusive.

Question 6: Do you agree with the proposed minimum functional requirements for the IHD?

6.1 Consumer Focus broadly supports the inclusion of the proposed information criteria outlined in paragraph 2.12. p.5 of the consultation:

- Capability to display information on both gas and electricity consumption
- Presentation of information on current electricity and gas consumption as well as current tariff
- Presentation of information on historical consumption so that consumers can compare current and previous usage

³⁰ ACEEE Advanced Metering Initiatives and Residential Feedback Programmes (2010).

<http://bit.ly/dphPoX>

³¹ *The smart way to display. Exploring consumer preferences for home energy IHD functionality.* A report for the Energy Saving Trust by the Centre for Sustainable Energy

³² *Consumers' views of Smart Metering*, report by FDS International for Ofgem, July 2010, <http://bit.ly/alcMhb>, page vii

- Presentation of information on cumulative consumption for current day/week/month/billing period
- To facilitate consumer understanding, usage information must be displayed in pounds and pence as well as kilowatts and kilowatt hours, and the display must include a visual (ie non-numerical) presentation that allows consumers to easily distinguish between high and low levels of current consumption⁵
- Presentation of accurate account balance information (amount in credit or debit)
- Local time
- Status of communication link

6.2 However, we strongly believe that more work needs to be done before the minimum standards are finalised including around how these basic criteria are applied in practice. Much greater consideration is required around of the display needs of:

- current and future prepayment meter and pay as you go users
- current and future TOU tariff customers
- vulnerable consumers and those with special requirements
- the presentation of the Green Deal charge and any other energy efficiency charges where applicable

Historical information

6.3 We support a requirement on energy suppliers to provide historical data. As mentioned, easy access for consumers to historical data is central to maintaining a competitive market and delivering the benefits of smart metering. However Consumer Focus believes that a high-level requirement will not suffice. Customers need to be able to access their own energy consumption information in a format that allows them to make like for like comparisons with other energy deals available on the market. They should also be able to use it alongside information from a previous supplier where they are comparing their usage over a period of time. If suppliers provide information covering differing time periods in different formats, comparisons may be difficult, making it hard for customers to find the best deal for them and understand their usage. Some standardisation is required for switching purposes. This is particularly the case given the likely rise in smart tariffs such as intraday TOU tariffs which will make it increasingly challenging for customers to find out what the financial impact of a new tariff would be. Innovation around historical information provision could still take place, particularly via online portals, but customers still need to have access to the key information they need to switch via their IHD.

Tariff information, kWh and time of use

6.4 We welcome IHDs having to display the customer's current tariff, ie the cost per unit in pence per kWh and overall usage in kWh. This is key information for the customer to make an informed switching decision. The former is particularly useful for customers using TOUs. But further work is needed to ensure that displays are 'TOU ready'.

6.5 £1.06 billion of benefits³³ from smart metering are expected to come from consumers shifting their energy use and taking advantage of lower cost TOUs. The IA estimates that one in five of us³⁴ will take advantage of TOU tariffs including intraday multiple rate tariffs and critical peak pricing. There are also already an estimated 3.6

³³ *GB-wide smart meter roll out for the domestic sector*. 27.10.2010. IA No: DEC0009. Impact Assessment <http://bit.ly/c4vaQX>, page 2

³⁴ *Ibid*, page 28

million consumers who are on some form of TOU tariff³⁵, such as Economy 7 or Economy 10 who would benefit immediately from this functionality.

6.6 It is crucial that minimum standards for displays not only allow customers to easily compare unit price between tariffs but also that customers are given clear prompts when prices are changing and they are moving onto relatively low or high cost charging periods. Prompts could include ambient lighting such as high/medium/low, colours or some kind of noise to signify higher or lower charging periods at a glance. Research needs to be carried out to understand the needs of TOU users.

6.7 If every consumer that switches to a new tariff is provided with a new IHD, this could lead to a higher cost being passed on to the consumer. The environmental impact of manufacturing additional displays, and disposing of old displays should also be taken into consideration.

6.8 Importantly, if the displays are not 'TOU ready' then the IA will need to reflect this additional cost. Without this information customers will be limited in their ability to respond to price signals and access the stated benefits.

Prepayment meter customers – IHDs should be prepay ready

6.9 Consumer Focus considers that the consultation document as it stands does not pay sufficient attention to the needs of prepayment customers. Ideally we want to ensure that if a customer switches to prepay remotely that they don't have to be given a different IHD, as this will add to the cost to serve of prepay tariffs and undermine the benefits in terms of cost savings coming from smart prepay.

6.10 Prepay customers will need to have access to additional information on their IHD. We suggest this includes the following, based on some of the requirements for PPMs in Tasmania³⁶ and our own PPM research³⁷:

- Current consumption information in kWh and pounds/pence
- Information on the standing charge
- Any debt recovery rate
- Level of debt remaining
- When emergency credit or friendly credit is being used
- The remaining credit available or amount of emergency credit used
- Whether the meter is operating in normal, emergency credit or friendly credit mode
- How to safely re-enable supply

6.11 Some of these functions will also be of benefit to standard credit customers and consideration will need to be given to those paying via third party payment schemes such as fuel direct and the needs of customers on managed credit tariffs.

³⁵ energywatch figures, March 2007. The total number of customers with restricted hour meters was: 3,661,523

³⁶ *Smart pre-payment in Great Britain*, Sustainability First report, Gill Owen and Judith Ward, March 2010 <http://bit.ly/dzwEeM> page 22

³⁷ *Cutting back, cutting down, cutting off, Self-disconnection among prepayment meter users*. Consumer Focus, July 2010, <http://consumerfocus.org.uk/g/4lx>

Using the IHD to top-up

6.12 We are aware of industry views that allowing prepay customers to top up via their IHD poses an additional technological challenge and cost. However, we have received mixed information on the actual cost that would be involved and whether this would be significant. We seek clarity from Ofgem as to their assumptions in this regard.

6.13 Any cost benefit analysis should recognise not only the millions of customers that already have prepay but also that this market is likely to expand in a smart world. Our research suggests that at least a third of customers would be interested in pay as you go energy tariffs if the price was competitive with Direct Debit and easy to top up³⁸.

6.14 Being able to top up via the IHD would also make the lives of existing prepay users considerably easier – our research³⁹ showed that consumers were frustrated with the lack of options for topping up, and compared the prepay market unfavourably to other sectors, such as pay as you go mobile phones. We strongly encourage suppliers to work towards making other options for topping up, including via the IHD, available to their customers as soon as possible.

Advice

6.15 We suggest that prepayment customers will need additional advice/information during the installation visit on areas that are specific to their payment method eg information on emergency credit and friendly credit facilities, how to top up, advice on debt functions, and safety aspects such as re-enablement of supply. This additional information would also need to be given to customers who switch from a credit to PPM.

Minimum standards for the default screen

6.16 We believe there is a strong argument for minimum standards for the default screen. For consumers to understand and engage with their IHD, it needs to be easy to use, with the key information available at a glance.

6.17 A supplier trial⁴⁰ suggested that consumers rarely look beyond the first or second screen on an IHD. It is crucial that they do not have to delve further than that to retrieve key information. This is supported by a recent EST study,⁴¹ which showed that some consumers do not want to interact with the IHD, as they don't want to lose the screen that they understand. We support the EST's view that, 'Careful specification of the default mode of an IHD is therefore critical.'

6.18 Key information on the default screen should include as a minimum:

- Usage information displayed in pounds and pence
- Indication of what fuel is being used (electricity/gas)
- Some type of ambient feedback
- Show a mixture of verbal and numerical information, and graphics/images/other
- Signal strength

³⁸ *Cutting back, cutting down, cutting off, Self-disconnection among prepayment meter users*, Consumer Focus, July 2010, <http://consumerfocus.org.uk/g/4lx>, Annex 4

³⁹ Ibid, page 16

⁴⁰ Confidential supplier findings, December 2009. Trials of portable wall IHDs

⁴¹ *The smart way to display. Exploring consumer preferences for home energy IHD functionality*. A report for the Energy Saving Trust by the Centre for Sustainable Energy

6.19 A logical and intuitive design should then make it easy for consumers to find other, more detailed information as and when they need it. A prepay mode should be considered.

Micro-generation

6.20 We support Ofgem's view that minimum functionality for IHDs does not need to display information on micro-generation at this stage. This will be a desirable 'extra', which could/will be packaged as part of micro-generation services provided by an energy supplier. This should be kept under review however.

Question 7: Do you have any views or evidence relating to whether innovation could be hampered by requiring all IHDs to be capable of displaying the minimum information set for both fuels?

7.1 As a key principle, consumers should be able to switch supplier, and switch between dual fuel and taking fuels from separate suppliers, without having to change their meter or IHD. This is particularly important as our latest analysis of energy prices shows that in some areas it is cheaper to take gas and electricity from separate suppliers, depending on payment method. We seek clarification on whether both IHDs will automatically show dual fuel, or whether this function will need to be activated.

7.12 We would be interested to hear Ofgem's views on the potential financial burden that may be placed on certain suppliers. We have been told that in some instances, a gas smart meter will not be able to communicate unless an electricity smart meter is also installed⁴², as the communication will have to pass 'via' the electricity meter. Unless of course a separate communications box is put in place at an additional cost. Given that just under a third of households receive electricity and gas from separate suppliers⁴³ have a separate supplier for gas and electricity, ideally these households will receive their electricity smart meter first. Will this place a disproportionate burden on the electricity supplier, who should be the first to install, to supply a display? If this cost is passed on it could have a disproportionate impact on electricity customers, being unfair in particular to electricity only customers. We seek clarity on whether this is actually the case.

Question 8: Do you agree with proposals covering the roles and obligations on suppliers in relation to the IHD?

8.1 Consumer Focus does not support Option 1 of a short-term obligation on suppliers. There are a number of different instances where a new IHD may be needed by customers outside of the initial installation visit; below we have outlined the approach that we believe should apply in each case.

Customer declined a display during the installation visit

8.2 We do not agree with the one year cut-off point for obtaining an IHD. Consumers will be indirectly paying for their IHD through increased bills, therefore they should be entitled to change their mind and receive a display at any stage. In addition, those who do not accept their displays during the initial installation visit are likely to be 'late adopters'. It seems nonsensical to put barriers in the way of those who are already slow to change their behaviour and reduce their energy consumption by charging them for an IHD.

⁴² Unless a separate communications box is installed. We have been told that that would cost £50-£100 which would not be acceptable from a consumer perspective

⁴³ Ofgem Energy Supply Probe - Initial Findings Report, 6 October 2008, page 36, <http://bit.ly/c5wgSx>

8.3 Consumer Focus believes that customers who do not take up the offer of an IHD during the installation visit should be able to request one at any stage, without any direct cost. They should be regularly reminded of this right by the supplier. If they decide they want a display the supplier should be obliged to visit the home to install it and demonstrate how it can be used. This is particularly important as experience from the move from token PPMs to key PPMs showed that those last to engage are often vulnerable consumers.

8.4 If the customer does not want a home visit to install their display, consideration must be given as to whether posting the display is an appropriate option. We would remind Ofgem that safety concerns were raised during the Energy Billing and Metering consultation in 2008 around customers installing their own clip on displays and having to pierce the electricity wire.

8.5 Thought will also need to be given as to what steps will need to be taken to make any DIY installation as easy as possible for customers and prevent the display just being left in its box. For example, the customer should receive a telephone call to check that they have successfully set up the display or to provide an opportunity where the supplier can take them through using it.

8.6 This would also offer a powerful incentive to suppliers to actively promote the benefits of an IHD at the point of installation. The installation visit would also offer an important touch point to improve customer satisfaction, and potentially boost customer retention.

Customer switches to prepayment

8.7 If a customer, who does not already have an IHD, moves to prepay, all suppliers should provide them with a new IHD, free of charge. The IHD will be an important tool for these customers to engage with their smart meter, and depending on the display functionality chosen, to top-up in the future. The IHD would allow them to monitor their usage more easily as well as address the problems with existing meter displays and ease of accessing information. It could also increase customer satisfaction; not knowing that the meter was about to run out of credit, and being taken by surprise when the power suddenly went out, was a frustration of some of the PPMs customers our recent research.⁴⁴ For more information on protections for PPM customers see our response to the Protections consultation.

Customer has a smart meter and switches supplier

8.8 Provided that IHDs are fully interoperable, meaning that consumers do not need a new one when they change supplier, we support it being up to the supplier if they offered a different display as part of their energy deal ie the same approach as with mobile phones.

⁴⁴ *Cutting back, cutting down, cutting off, Self-disconnection among prepayment meter users.* Consumer Focus, July 2010, <http://consumerfocus.org.uk/g/4lx>, page 14

Change of tenancy⁴⁵

8.9 In cases where tenants move into a new property with a smart meter when they have not had one before, or do not have a display, the supplier should find out at the initial contact point if they have had one before. The supplier should then inform them that they are entitled to receive an IHD, free of charge and with all direct costs borne by the supplier (including installation and a demonstration of how it works). This should be part of the supplier change of tenancy practices.

8.10 This approach will be particularly relevant in the first few years of the rollout, where many consumers will not have any previous experience of a smart meter when they move into the new property. Receiving an IHD will be important to help them realise the benefits of their new meter. We suggest that Ofgem reviews this approach on a regular basis.

IHD is faulty

8.11 We are very strongly opposed to the proposition that suppliers should only be responsible for repairing a faulty IHD for up to a year after it is provided. If the display breaks through no responsibility of the customer, it should be the suppliers' responsibility to replace it. Limiting the suppliers' responsibility for repair to a year would provide no incentive for suppliers to provide robust, good quality IHDs. It also seems to promote planned obsolescence for IHDs, whereby after a year or so IHDs would break, and customers would be obliged to buy a new one from their supplier or another source. In addition this would result in unnecessary confusion for customers when complaining or seeking redress. Up to a year they could go to their supplier if there was a problem, after this time they would be sent to the manufacturer. It would also be left to the customer to establish if the fault was as a result of the display itself and therefore the manufacturer's responsibility or the home area network, which would be the suppliers' responsibility. Similarly if they failed to get resolution – who would they go to, the Office of Fair Trading (or local Trading Standards) or the Energy Ombudsman?

8.12 The argument that suppliers should not replace any faulty equipment because of the lack of evidence around their enduring use is also incredibly short-sighted given the growing evidence of the enduring use of displays where customers are on time of use tariffs, the potential for prepayment functionality or heating controls which add an additional 'stickiness factor'.

Smart meter installed before mandated rollout

8.13 For consumers that received a smart meter without a stand alone display before the rollout began, there should be an obligation on suppliers to proactively inform consumers of their rights to receive an IHD free of charge and with all additional costs borne by the supplier (including a visit, installation and a demonstration of how it works). Some of these consumers may have been offered feedback via a web-based portal rather than an IHD, or have initially declined an IHD. In any case, they should have the option to receive one.

⁴⁵ *The Modern UK Housing Market – Origins and Prospects, Part 1: Private rented housing*. A report for the Association of Registered Letting Agents (ARLA), <http://bit.ly/9g4AGE>, page 4. Average length of time tenants stay in a property is 15 months.

IHD is lost/stolen – who owns the display?

8.14 We are aware that offering unlimited replacement IHDs might be open to abuse from certain consumers. Ultimately it should be the customer's responsibility to look after their display. Consumer Focus supports it being left to the supplier's discretion whether a replacement is given free of charge and would hope that appropriate consideration is given to the customer's circumstances.

8.15 However, we seek assurances that customers will not be required to pay for any lost, stolen or broken displays. We are aware that some suppliers currently have in their contracts that the IHD is their property. Consumer Focus seeks clarity as to whether this will be the case going forward.

If the consumer declines the IHD during the installation visit

8.16 Where a customer declines an IHD or objects to installation, alternative feedback options eg web, TV, phone should be explained, as well as the right to change their mind later.

Consumer cannot have an IHD but wants one

8.17 We seek guidance from Ofgem as to what would happen in cases where a consumer is unable to have an IHD but would like one. For example, for consumers living in a tower block, where the meter is situated in the basement, a metal lift shaft could prevent the signal from passing from the smart meter to the IHD. The EDRP trials reported particular problems in installing communications in properties where the meter was at a distance from the real-time display, as is common with high rise flats. In this case, would suppliers be expected to find a solution, such as hard-wiring the IHD? Consumer Focus believes that consideration should be given to an obligation on suppliers to take all reasonable steps to provide their customers with an IHD and detailed guidance around what this entails to be developed by Ofgem. This should be regularly reviewed to take account of evolving technology.

8.18 Where installing an IHD is technically not feasible, alternative feedback options should be considered such as by mobile phone, via the internet, or more frequent and more detailed hardcopy feedback – this should be free of charge. This will be necessary to comply with EU third energy package which states that all customers have to have energy efficiency feedback frequently enough to enable them to regulate their energy use.

Encouraging take up of IHDs

8.19 It is important that suppliers encourage as many consumers as possible to take up the offer of an IHD. Ensuring that the consumer gets a demonstration of how the IHD works and gains a clear idea of the benefits for them of having an IHD during the installation visit is essential but will add time to the home visit. We are mindful to avoid a situation where pressure to maximise the number of meter installations each day could result in customers being discouraged from taking up the offer of an IHD. We suggest that staff incentives are partly based on the number of IHDs installed. Suppliers should also be obliged to regularly report on the number of IHDs installed alongside other feedback options, and reasons why the display was not installed. We also believe that an enduring obligation on suppliers to provide an IHD on request where the customer did not accept one before will be an added incentive.

Interoperability of IHDs

8.20 We seek assurances from Ofgem and industry that when a customer switches supplier that they will not have to change their IHD. If this happens it will result in unnecessary cost and inconvenience to the customer. It could also act as a barrier to consumers switching supplier.

8.21 Consumer Focus is keen that Ofgem draws lessons from other industries' approach to interoperability, and does not repeat past mistakes. An example of this was the lack of interoperability of mobile phone chargers, which was finally addressed (partially) in 2009, when 10 major EU mobile manufacturers committed to adopt a universal charger for handsets sold in the EU from 2010⁴⁶ (although the new universal charger will only be compatible for data-enabled mobile phones). The lack of interoperability until now has undoubtedly caused consumers unnecessary inconvenience and expense when a charger is lost, as well as the environmental impact of producing and disposing of the chargers.

Developing standards/accreditation for IHDs

8.22 We are not aware of any European standards for displays and the British Standards Institution (BSI) has not yet developed any. However, we are aware that the EST is in the process of developing and consulting on a proposed standard for displays as part of EST Recommended (ESTR). We are supportive of a quality mark in principle, given that in the future it is likely that consumers will be able to buy an IHD from a high street retailer. However, any quality mark would need to be developed to rigorous standards and appropriate with all groups of consumers, including vulnerable customers. As mentioned we support usability testing and the principle of inclusivity by design.

During the home visit

- The display should be installed and left fully operational
- The customer should be given a demonstration of how to use the IHD, eg turning kettle on and off, and a clear explanation of the benefits of using the IHD. Other behavioural changes, such as turning the thermostat down one degree (if appropriate for the customer) should also be suggested, with an idea of how much money could be saved. This advice needs to be consistent across all suppliers
- Proper advice around any traffic lights on energy display, ambient lighting or alarms should be given. The importance of maintaining an adequate heating regime must be emphasised
- Where the customer uses prepayment – the PPM functionality including topping up should be explained
- Where a customer declines a display or objects to installation alternative feedback options eg web, TV, phone should be explained as well as the right to change their mind later
- The customer should be left with hard copy information on the IHD which explains in more detail the verbal advice. This is to act as a reminder and also for use by other household members who may not be present during the installation visit

⁴⁶ <http://bit.ly/cKzGVH>

- Each supplier should provide a freephone helpline (free from mobiles as well as landlines) to help respond to customer enquiries about displays and energy efficiency. Free access from mobiles is important as an estimated 14 per cent of all UK households only have mobiles, not landlines. These mobile-only customers tend to be disproportionately on low incomes⁴⁷

Accreditation of the person giving the advice

8.23 Consumer Focus suggests that a check-list of standard advice for using the IHD and the smart meter is developed, to ensure a consistent approach across all suppliers. This approach is already taken for advice given as part of the Carbon Emission Reduction Target (CERT)⁴⁸. Advisers should also be appropriately trained with relevant qualifications and CRB check, as well as any other necessary attributes such as interpersonal skills. We suggest that Ofgem considers introducing a requirement for a minimum level of qualification, in line with the minimum qualification requirements for energy advisers working within CERT.

8.24 More information on this in Question 13 on our response to the installation supplier code of practice.

⁴⁷ *Ofcom Report on the Communications Market, 5 Telecoms and networks*, <http://bit.ly/d8vGZc> page 333-335

⁴⁸ <http://bit.ly/9hVhXg> appendix 17 HEA behavioural checklist, page 115

Summary of key recommendations

- We support minimum standards for displays which will ensure that all customers, regardless of income, receive a high quality display, provided at no direct cost to the customer (be that via upfront costs, or a higher tariff)
- Minimum standards need further consultation and should cover information provision, functionality, and usability. More work is needed on standards in relation to TOU, PPM customers and vulnerable consumers
- We support a licence condition on suppliers to ensure suppliers not only a) ensure that all customers are offered, at no additional cost, an appropriately designed IHD, where their needs will not be met with the standard display but also b) that they use displays which meet 'inclusivity by design principles' and an agreed usability standard
- Suppliers should also be mandated to offer a standalone display to micro-business customers at no direct cost
- Clear roles and responsibilities need to be established around complaint handling and redress should the customer have problems with their IHD. Consumers should be able to access the same redress bodies eg Consumer Focus Extra Help Unit (or its successor) and Energy Ombudsman
- Minimum standards should be reviewed regularly and Ofgem should carry out independent research to get customer feedback and suppliers should report on installations
- Any discrepancy between current consumption figures on the display or account balance and the final amount consumers will have to pay should be clearly explained
- Ambient feedback information could play a useful role in helping consumers understand their energy usage with added benefits for customers on prepayment or TOU tariffs
- We strongly encourage Ofgem to carry out research into the display needs of vulnerable and low income consumers, and non-English speaking communities
- We do not agree with the one year cut-off point for obtaining a new display especially in the case of faulty displays or customers who decided not to accept a display during the smart meter installation visit
- Consumers should be able to switch supplier without having to change their meter or IHD – interoperability is key to a successful rollout
- The supplier installation code of practice should include minimum standards around advice provision and demonstration of the IHD. We recommend that a check-list of standard advice for using the IHD and the smart meter is developed, to ensure a consistent approach across all suppliers



**Consumer
Focus**

Campaigning for a fair deal

Smart Metering Implementation Programme: In-Home Display

For further information on this submission, please contact [REDACTED]

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