

Smart Metering Implementation Programme (Ofgem and Department for Energy and Climate Change)

Royal National Institute of Blind People response (October 2010)

About us

As the largest organisation of blind and partially sighted people in the UK, RNIB is pleased to have the opportunity to respond to this consultation.

RNIB is a membership organisation with over 10,000 members who are blind, partially sighted or the friends and family of people with sight loss. 80 per cent of our Trustees and Assembly Members are blind or partially sighted. We encourage members to be involved in our work and regularly consult with them on government policy and their ideas for change.

As a campaigning organisation of blind and partially sighted people, we fight for the rights of people with sight loss in each of the UK's countries. Our priorities are to:

- Stop people losing their sight unnecessarily
- Support independent living for blind and partially sighted people
- Create a society that is inclusive of blind and partially sighted people's interests and needs.

We also provide expert knowledge to business and the public sector through consultancy on improving the accessibility of the built environment, technology, products and services.

Introduction

RNIB welcomes the opportunity to comment on the Prospectus for the implementation of the smart metering programme. It is especially important we have this opportunity to get involved now a decision has been taken to speed up the implementation of smart meters. We have appreciated the constructive way Ofgem has approached this task and for proactively engaging with organisations of disabled people. We responded to the Department for Energy and Climate Change's original

consultation on smart metering for gas and electricity so many of the points we made then still apply.

We will restrict our comments to those areas we have most expertise, namely consumer protection and the functional requirements of the in-home display (IHD).

1. Consumer Protection

Question (4) in the consumer protection consultation

1.1 In the Executive Summary of the Prospectus Ofgem states that, "smart meters will provide consumers with greater visibility of and control over their energy use". RNIB applauds this vision but to really deliver for blind and partially sighted consumers, suppliers must provide "accessible" and "usable" meters. We are pleased disabled users, especially those with sight loss appear to have been included in priority target groups so that any accessibility and usability issues can be identified and addressed early on. The priority for Ofgem must be to translate its policy on consumer protection into equal access for blind and partially sighted consumers.

1.2 Although Ofgem is reluctant to be too prescriptive, RNIB recommends the regulator sets out clear expectations with regard to accessibility. It is fine to provide a standalone display with a smart meter, if it has an accessible design and suppliers can provide alternative formats with information on household energy consumption. In our view guidance must underline that suppliers have an obligation to provide disabled consumers with devices they can easily access and use. It should be absolutely clear that the cost of doing so will not fall on disabled consumers but will be borne by the suppliers themselves. We do not think it's strong enough to simply advise that suppliers should not be "expected" to charge customers with disabilities for providing special features.

1.3 It is worth adding that we think there's a strong case for making all in-home displays accessible - not just those provided to consumers with sight loss. Taking into account that we have an ageing population, and a doubling in the numbers of people with sight loss between now and 2050, we do not see any obvious reason why displays shouldn't be designed to include large display screens and big buttons.

2. In-Home Displays

Question (16) What information, advice and support might be provided for vulnerable consumers (e.g. a dedicated help scheme)? Who should it be provided to?

2.1 We would simply state here that there are real benefits to be derived from a dedicated help scheme. Our experience of the help scheme for digital switchover is that it made blind and partially sighted people more confident in the use of new in-home equipment. Ofgem is right to observe that it is often easier to explain the benefits of new devices working through third parties. Voluntary and community sector groups enjoy trusted relationships with disabled consumers and are therefore well placed to share information on smart meters and perhaps even facilitate installation.

2.2 Following on from what we said in relation to consumer protection, we very much support the idea of a licence obligation around the need for appropriately designed in-home displays (IHDs). This would mean suppliers providing IHDs to consumers with special requirements (at no additional charge) and for best practice to be identified and shared once suppliers start to roll out IHDs.

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