

Response to Ofgem Smart metering Implementation Programme In Home Display

Ricability (Research Institute for Consumer Affairs) is an independent consumer research and information charity that has specialised in work with disabled and older consumers for over 25 years. Originally founded by Consumers' Association, publishers of *Which?* the organisation has 40+ years experience of using a range of consumer research methods to investigate and report on a variety of social issues affecting consumers. Our work includes

- *evaluation* – user and technical tests, surveys and other assessments carried out on a wide range of both mainstream and specialist products and services
- *publication of unbiased, practical consumer guides* enabling consumers to make informed choices, in a range of accessible formats
- *improving the standards of products and services* by using research to help manufacturers, service providers, policy makers and regulators to increase their awareness of the needs of older and disabled people. In the case of mainstream products and services, we demonstrate through consumer research how inclusive design can make them easier for everybody to use, including disabled people.

www.ricability.org.uk

www.ricability-digitaltv.org.uk

Question 4

Yes we believe there is a case for a supply license obligation on this. Suppliers should be obliged to show that they have taken steps to design IHDs that meet inclusive design standards.

Ricability's 2004 user test research on central heating controls identified that older and disabled consumers experienced a number of difficulties using digital programmers and thermostats.

There are over 12m people in the UK aged over 65 and 11m people with a disability. Although the two groups overlap they make up a huge and growing proportion of UK consumers. If these consumers cannot easily use their IHD there will be little hope of the smart metering programme achieving its targets for changed consumer behaviour and reduced energy consumption.

The IHDs should be designed to meet inclusive design standards – to be usable without adaptations by the maximum range of people. Many of the principles involved are well known and to the list drawn up by the Disability Advisory Panel we would add

Response to Ofgem Smart metering Implementation Programme In Home Display

- Adequate colour contrast
- Protruding buttons, distinctive enough to be identified by touch
- It should be possible to fix the IHD to a wall
- Plain language, well presented instructions

Design and development should be based on existing research, supplemented by testing among appropriate groups. Some of the work into basic requirements could be done pre-competitively and shared by all manufacturers. The application of findings would then allow for a range of designs and dissimilar solutions.

It should be possible for IHDs designed on these principles to meet the needs of all but a very small majority of people. The licence should require suppliers to cater for those who cannot use the IHD, but leave the method by which this is done open – the solution for this group may be in alternative forms of information delivery rather than in the design of hardware.

Question 3

We already know that some people live in dangerously cold conditions because of fear of heating bills. Whether or not ‘traffic lights’ or other method of presenting data make this more or less likely could only be discovered by testing in realistic circumstances over a reasonable period – perhaps during a pilot. However it should be reasonably easy to include a menu of different displays.

The central problem is that IHDs are intended to encourage people to use energy more effectively, so any attempt to disguise the data may be counter productive. As the paper suggests the solution is in the way the equipment is introduced and the information and training provided. Service providers should be required to provide adequate tuition and information to vulnerable people likely to need it and post installation support. This needs to be provided by a suitably qualified person. A model for this is provided by the Digital Switchover Help Scheme.

Perhaps one option for the display is relating consumption to budget – real alerts would only show if there was a danger of using more energy than you could afford.

Question 5

There are obvious advantages in having a portable display – some commercial systems work wirelessly for this reason. Some central heating controls (which are fixed) unplug from the wall so they can be hand held when being reset. Such an approach is very unlikely to be as expensive as these forecasts.

Response to Ofgem Smart metering Implementation Programme In Home Display

Otherwise the problem of fixed IHDs is that they may be difficult to see by some people. We recommend that

- they include an option of being freestanding with a flexible connection (like an alarm clock or table lamp)
- consumers should choose if they are to be fixed and where they are placed
- if fixed, they should be relatively easy to move