



supporting blind and
partially sighted people

Ofgem: Smart metering consumer protections package - statutory consultation

Consultation response

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Royal National Institute of Blind People

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About us

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.

In the UK there are almost two million people that have a sight problem which has a serious impact on their daily lives. That's about one person in thirty. The figure is made up of people who are registered blind and partially sighted, and all the other people whose sight problems have a significant impact on daily activities.

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 Smart metering consumer protections package. 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.

Consultation response

It is accepted that disabled people are both amongst those most likely to experience fuel poverty and, for the purposes of the Smart Metering Programme, among those likely to be considered vulnerable.

It is important therefore that the needs of disabled people are at the forefront of the development and implementation of the processes that drive the installation and functionality of smart metering.

Requiring suppliers to fully understand and meet the capability and needs of individual vulnerable customers will ensure that their best interests are protected, that they are not disadvantaged by the changes and, where their

circumstances allow, they are able to benefit from the potential energy cost savings that smart metering may offer.

We are happy with the guidance that specifies that:

"We expect suppliers to have made every attempt to make personal contact with a customer, or to have conducted a site visit, before they remotely switch that customer to prepayment mode or disconnect them."

We do have however a few questions or concerns which are described below.

Feedback comment 1:

When it is stated that "we expect suppliers to have made every attempt to make personal contact with a customer, or to have conducted a site visit, before they remotely switch that customer to prepayment mode or disconnect them", we would expect that it would not be felt that simply sending a standard letter would constitute 'personal contact'.

There needs to be a discussion between the supplier and the customer to explain the situation and the consequences. Delivering a letter in (potentially) a non-accessible format would not communicate this important message and would not be acceptable. All information provided to customers with sight loss should be provided in a format that is accessible to the customer i.e. audio, large print or Braille.

Feedback comment 2:

There are a few concerns in that the supplier needs to ask relevant questions to determine if it is safe and reasonably practicable for the customer to use a prepayment meter before the switch to a pre-payment meter is carried out.

The main issue is:

Is a user, who is partially sighted or blind, able to use a prepayment meter?

Consider issues like:

- Is the person able to access the information on the display, in order to know how much credit is left on the meter? If the person cannot access this information they could unexpectedly run out of credit. Alternative means of finding out this information could for example be:
 - Talking smart meter
 - Making a phone call to access the information remotely (this should be a free phone number)
- Is the person or a trusted person in the household, able to get cash or top up the card or key to use with the pre-payment meter? This is a particular problem for those blind and partially sighted people who are less mobile,

perhaps live alone and rely on family or friends to run errands or collect cash for them. They could be left without electricity or gas for several days if they aren't visited often.

- Is the person or a trusted person in the household, able to insert cash or insert the card or key into the meter to top it up? Consider that for a blind person a card like a credit card is potentially difficult to use as it might not be clear which way round the card should be inserted and the visual warning/instructions on the screen might not be accessible.
- Other (age-related) disabilities might also affect the use of a pre-payment meter.
- Is the information on how to use and pay for a pre-payment meter accessible. If the information is sent out in a standard leaflet, a blind or partially sighted person might not be able to access the information.
- A person with serious sight problems might not consider themselves to be disabled, especially if sight loss has gradually worsened over years. They might not have mentioned this, may not be on the priority register and do not realise that the proposed pre-payment meter is not accessible to them (as they won't be able to access the screen needed to operate the meter). People should be specifically asked, and tested, if they are able to read the display with ease (including the smaller, less obvious, but often very important information on the screen).

Feedback comment 3:

On page 2 of 21, 2nd paragraph from the bottom, it states that: "Ultimately, customers who are not happy with the smart meter package on offer can choose not to accept it. Suppliers must ensure customers can make well-informed decisions in this regard."

This paragraph could benefit from a reference stating that for a customer to make a well-informed decision they should know if the smart meter and the instructions are accessible or not.

Conclusion

We welcome the requirement that suppliers make every attempt to make contact with vulnerable customers. We are however concerned that Suppliers factor in the needs of customers with sight loss to their communications plans. Information should be provided in a format that customers can read.

Suppliers must ensure that they have identified those customers whose sight condition will impact on their ability to use prepayment. It is not enough to assume that all customers with sight loss will be on their priority register. Questions posed by suppliers to customers when considering the option of moving them to prepayment need to be designed to draw out instances where the customer will have difficulty reading the display on the meter.

Consideration must also be given to how readily individual customers will be able to access cash for prepayment.

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