



Consultation on Proposed National Rollout of Electricity and Gas Smart Metering

**RESPONSE FROM: Edward Crean and James Hubbard (National Disability Authority)**

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## CER – Information Page

### Abstract:

This consultation outlines the proposed decision by the CER to proceed with the national rollout of electricity and gas smart metering to all residential consumers and a significant proportion of small-to-medium enterprise (SME) consumers. This proposed decision is based on the positive results of the recently completed electricity and gas smart metering trials and associated cost-benefit analyses.

The consultation outlines the proposed high level design, functionality and implementation approach of the national smart metering rollout and invites feedback on these proposals.

### Target Audience:

This paper is for the attention of members of the public, the energy industry, energy consumers and all interested parties.

Responses to this consultation should be returned by **Tuesday 13<sup>th</sup> December 2011** via email, post or fax and marked for the attention of Gary Martin ([gmartin@cer.ie](mailto:gmartin@cer.ie)) at the CER.

**The CER intends to publish all submissions received.** Respondents who do not wish part of their submission to be published should mark this area clearly and separately or enclose it in an Appendix, stating the rationale for not publishing this part of their comments.

## Appendix A – List of Substantive Questions

Appendix A provides a list of questions asked throughout this consultation paper - these questions are presented in the table below.

**The aim of this section is to allow for a “short-cut” option for respondents to submit their comments to the CER.** Respondents are invited to complete the table to indicate their position on the questions being asked. Respondents should outline YES or NO answers to each of the questions listed. If they have a further comment which will clarify their answer, this should be included in the Comments box. Appendix A will be published alongside the consultation paper in Word format.

Please note: Respondents are in no way obliged to respond to the questionnaire provided and are welcome to submit comments in their preferred format. When preparing responses respondents should indicate which question or proposal their text refers to.

Please note also that, as the majority of questions posed in this consultation address both electricity and gas smart metering issues, respondents should make it explicit in their responses if their comments are applicable to electricity, gas or both.

Question	Yes	No	Comments
<p><b>Q1.</b> Respondents are invited to comment on the proposed decision by the CER to proceed with the national rollout of electricity and gas smart metering as outlined in Section 2. Are you in favour of this proposal? Outline reasons for agreement or disagreement.</p>	X		<p>All the indicators suggest that this will be a process which benefits consumers. It is important that from the beginning the roll out of smart meters is accompanied by a commitment to the universal design of the hardware, software and information resources that will be deployed.</p> <p>Applying Universal Design principles reduces discrimination exposure and will enable a wider number of customers to easily</p>

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		<p>participate in the smart meter rollout. Universal Design prioritises the customer's ability to understand and use the information and services provided which in turn will reduce downstream costs required to support customers who require assistance to understand or use the service provided. It promotes designs that are understandable by, accessible to and usable by as many customers as possible.</p> <p>The more flexible a service is, and the more options it provides to customers, the higher the probability of that service meeting the diverse needs of as wide a customer base as possible.</p> <p>Universal Design should be considered throughout the entire smart meter roll out experience from when the customer first reads or hears about it right through to when they have been set up as smart meter users.</p> <p>An organisation that positively contributes to society by incorporating a Universal Design approach is likely to receive a reputation for having a high level of corporate social responsibility.</p> <p>It should reduce the requirement for costly and wasteful retrofitting and create a sustainable service that meets the needs of all people to the greatest extent possible.</p>
<p><b>Q2.</b> Respondents are invited to comment on the proposed objectives of the National Smart Meter Programme outlined in Section 3. Are you in favour of the proposals? Outline reasons for agreement or disagreement.</p>	<p>X</p>	<p>As stated in the response to Question 1 the specific needs of vulnerable customers – and all customers regardless of age, size, ability or disability – can be better accommodated by adopting a universal design approach to the National Smart Metering Programme.</p> <p>The Commission and the National Disability Authority are</p>

		<p>leading a project, that involves a range of stakeholders, to produce a National Standards Authority of Ireland guidance standard for energy suppliers on universal design in customer services. This covers written, verbal and electronic-based communication with customers. It is suggested that the National Smart Metering Programme mirror the design principles that are laid out in the upcoming guidance standard which is due to be launched in the new year.</p> <p>These design principles should be extended to the proposed smart meter systems themselves. There should be particular emphasis on the design of the in-home display. Its layout should be as clear and legible as possible with a functionality, content and layout that makes it easily used and understood to the greatest extent possible.</p> <p>We welcome the commitment to support the needs of vulnerable customers. People with disabilities may be classed as “vulnerable” because of their disability and because of their financial situation.</p> <p>Consumers with disabilities are among the poorer members of society. Four out of ten people with disabilities experienced increased deprivation between 2009 and 2010 according to a European Union survey conducted in Ireland.</p> <p>The results of the Survey on Income and Living Conditions 2010 (Central Statistics Office, 30 November 2011) show that people with disabilities experienced by far the highest level of deprivation in 2010 compared with other household types such as the retired, the unemployed or students. Their deprivation rate was 42%.</p>
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		<p>It follows that there is an increased likelihood that consumers with disabilities would benefit from the pre-paid facility that smart metering will incorporate because they may have to strictly budget for their energy costs.</p> <p>Many people with disabilities are in receipt of the Electricity Allowance and the Gas Allowance under the Household Benefits Package. It is important that the National Smart Metering Programme links in with the Department of Social Protection so that the necessary information can be incorporated into the roll out process.</p>
<p><b>Q3.</b> Respondents are invited to comment on the proposed working assumptions outlined in Section 4 relating to data ownership, display and provision. Are you in favour of the proposals? Outline reasons for agreement or disagreement.</p>	<p>X</p>	<p>The references to vulnerable customers are in line with the position of the National Disability Authority on these issues. As mentioned above the Commission, the National Disability Authority and the National Standards Authority of Ireland will be launching their guidance standard for universal design in energy customer services in the new year. It is suggested that this would form the basis for a seamless transfer of the universal design principles contained within the standard to the billing content, frequency and tariffs set out in Section 4.</p> <p>It is important that consumers with disabilities should have equal access and choice for maximising the accessibility and usability of whatever alternative billing formats are applied.</p> <p>We suggest that the principle should be established of bills being provided, free of charge, in a format that is accessible to the customer.</p> <p>We would suggest that an explicit agreement must be reached with the consumer for opting in to a particular format and that agreement should be able to be independently verified, if so</p>

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			<p>required. Such procedures would reduce the risks associated with bad practice of "implicit consent" such as when a consumer has not responded, etc.</p> <p>There can be situations where an individual customer has become incapacitated temporarily, for example, being admitted to hospital, and may have an agreed designated person acting on their behalf. In such situations it may be preferable for the designated person to conduct and manage the other person's bills on line. Due consideration may need to be given here to any data protection issues that may apply.</p>
<p><b>Q4.</b> Respondents are invited to comment on the proposals outlined in Section 5.2.1 in relation to the electricity smart meter functionality requirements. Are you in favour of the proposals? Outline reasons for agreement or disagreement.</p>	X		<p>It is important that there is a comprehensive education programme for all users, and particularly vulnerable users, on the functionality of the smart meters.</p> <p>Specific provision will have to be made for those customers that are registered with the energy suppliers as having a vision or hearing impairment in order to make the functions accessible to them.</p>
<p><b>Q5.</b> Respondents are invited to comment on the proposals outlined in Section 5.2.2 in relation to the gas smart meter functionality requirements. Are you in favour of the proposals? Outline reasons for agreement or disagreement.</p>	X		<p>It is important that there is a comprehensive education programme for all users, and particularly vulnerable users, on the functionality of the smart meters.</p> <p>Specific provision will have to be made for those customers that are registered with the energy suppliers as having a vision or hearing impairment in order to make the functions accessible to them.</p>
<p><b>Q6.</b> Respondents are invited to comment on the proposals outlined in Section 5.2.3 in relation to the Wide Area Network (WAN) functionality and</p>	X		<p>We would not be in a position to comment directly on the technical features of the proposed WAN.</p>

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<p>technology. Are you in favour of the proposals? Outline reasons for agreement or disagreement.</p>		<p>We suggest that universal design principles become part of the WAN functionality project as early as possible, i.e. prior to a procurement process commencing.</p>
<p><b>Q7.</b> Respondents are invited to comment on the proposals outlined in Section 5.2.5 in relation to the Home Area Network (HAN) functionality and technology. Are you in favour of the proposals? Outline reasons for agreement or disagreement.</p>	<p>X</p>	<p>The plans set out for the Home Area Network are offer additional opportunities. Given that there is a move in health services in some countries (e.g. NHS in the UK) to the provision of tele-care and tele-health facilities rather than direct provision, there may be some role for the smart meter technology in facilitating or interconnecting with any future initiatives in this area.</p>
<p><b>Q8.</b> Respondents are invited to comment on the proposals outlined in Section 5.3.1 in relation to the procurement model. Are you in favour of the proposals? In particular, which of the two IHD provision responsibility options outlined do you prefer? Outline reasons for agreement or disagreement.</p>	<p>X</p>	<p>We will support whichever of the two IHD provision responsibility options is chosen.</p> <p>If the procurement process is to be managed by a public body it is important to note the following issues.</p> <p>Section 27 of the Disability Act 2005 sets out the law on the accessibility of goods and services, which includes goods and supplied to a public body.</p> <p>Here is the text of section 27:</p> <p>1) Where a service is provided to a public body, the head of the body shall ensure that the service is accessible to persons with disabilities.</p> <p>2) Subsection (1) shall not apply if the provision of access by persons with disabilities to any services provided to the body—</p> <p>a) would not be practicable,</p>



		<p>b) would not be justified having regard to the cost of doing so, or</p> <p>c) would cause unreasonable delay in making the goods or services available to other persons.</p> <p>3) In this section references to the provision of services include references to the supply of goods.</p> <p>4) This section shall come into operation on 31 December 2005.</p> <p>The National Disability Authority's Code of Practice on Accessibility of Public Services and Information Provided by Public Bodies sets out how public bodies can comply with the Disability Act 2005. Public bodies that comply with this Code of Practice can be confident that they are complying with the Disability Act 2005.</p> <p>Since 31 December 2005 each public body is required to ensure that the goods or services that are supplied to it are accessible to people with disabilities unless it would not be practicable or justifiable on cost grounds or would result in an unreasonable delay. This will relate to a wide range of goods and services including equipment, materials, information technology, etc.</p> <p>A public body can achieve this by:</p> <ul style="list-style-type: none"> <li>reviewing existing procurement policy, procedures, practices, guidelines or templates used or developed by the public body, to establish how they can be revised to build accessibility into the procurement process as a criterion (it would be important to check whether procurement policies make an</li> </ul>
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		<p>explicit statement on accessibility, for example);</p> <ul style="list-style-type: none"> <li>• taking care that, in all public procurement exercises, accessibility is a criterion to be considered throughout the entire tendering process, from drawing up and running tender competitions through tender evaluation and placing the contract to conclusion of procedures and review;</li> <li>• bringing this requirement to the attention of all relevant personnel who will be engaged in the tendering process and guiding them in relation to the circumstances where the requirement will not be appropriate on the grounds specified in paragraphs (a), (b) and (c) in section 27(2) (see below).</li> </ul> <p>Exceptions</p> <p>It is recognised that it might not always be possible to ensure that goods or services purchased by the body are accessible but exceptions should only be made in accordance with the circumstances specified in paragraphs (a), (b) and (c) in section 27(2) of the Act. They provide that the requirement will not apply where:</p> <ul style="list-style-type: none"> <li>• it would not be practicable (for example: where the technology is not readily available) or</li> <li>• it would not be justified having regard to the cost of doing so or</li> <li>• it would cause unreasonable delay in making the goods or services available to other persons (for example: where goods or services or both are otherwise available and required by other persons, so that significant delay in supplying them to those</li> </ul>
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		<p>other persons would be unfair).</p> <p>The National Disability Authority is developing a paper on procurement and accessibility that should be of use in informing public bodies on these matters when it is finalised in the new year.</p>
<p><b>Q9.</b> Respondents are invited to comment on the proposals outlined in Section 6 relating to the implementation approach and timelines. Are you in favour of the proposals? Outline reasons for agreement or disagreement.</p>	<p>X</p>	<p>We welcome the proposals in Section 6. Given the timelines there is an opportunity for the National Smart Meter Programme to become a world class example of an inclusive, understandable, accessible usable public infrastructure project that will have the capacity to influence the customer experience in every home in the country.</p>

**END**