

**National Disability Authority's**  
**Policy Advice Paper**  
**on the**  
**Commission for Energy Regulation's consultation**  
**CER National Smart Metering Programme**  
**The Presentation of Energy Usage Information**  
**(Smart Billing, Mandated In Home Display and**  
**Customer Web Interface)**  
**October 2013**

## Introduction

In response to the consultation, the National Disability Authority has deviated from the questionnaire as specified by the CER in order to focus on specific issues that would affect all citizens, but in particular those of different age, size, ability and disability, as this project is rolled out.

As a result the comments submitted focus on the advantages of products and processes procured on the basis of universal design; we believe these will be of benefit to all energy consumers.

## Mandated In-Home Display

The CER consultation paper on the Presentation of Energy Usage Information concentrates on the type of information to be provided to the customer. There is little reference in the consultation paper to the design of the Mandated In-Home Display and **how** the information will be displayed, apart from stating that the In-Home Display should provide simple and easy to use information.

Section 3 of the European Communities (Internal Market in Electricity and Gas) (Consumer Protection) Regulations of 2011, states that:

Distribution system operators and suppliers shall apply the principles of universal design to—

- (a) all products and services offered or provided to final customers, and
- (b) communications with final customers.

The National Disability Authority urges that emphasis should be placed on compliance with this legislative requirement in the CER's specification for the Mandated In-Home Display, in order to ensure that all energy customers will be able to use and benefit from the Mandated In-Home Display, regardless of their age, size, ability or disability.

The National Disability Authority has published a guidance document entitled **Procurement and Accessibility** (September 2012) in order to increase awareness of the legal requirement under the Disability Act 2005 for public bodies to ensure that services or goods supplied to them are accessible to people with disabilities and to guide public bodies on how they can build accessibility into their procurement policies, procedures and practice. [Procurement and Accessibility](#) is available on the National Disability Authority website.

The Centre for Excellence in Universal Design at the National Disability Authority has developed Technical Guidelines for the Universal Design of In Home Displays, to inform distribution system operators and suppliers on how to meet their obligations under Section 3 of the European Communities (Internal Market in Electricity and Gas) (Consumer Protection) Regulations 2011, with regards to the provision of Mandated In-Home Displays to final customers. These technical guidelines have been informed by a 3-stage research process which included a literature review, usability testing and stakeholder consultations. The technical guidelines arising from this research are based on international standards, guidelines and best practice. They set out 4 key areas that should be addressed when applying the principles of Universal Design to In-Home Displays which comprise the physical interface, screen interface design, tactile, audio and visual considerations and installation and power.

We believe that it is vital that a product such as the Mandated In-Home Display, to be provided to all energy customers in the country, is designed from the outset to be easy to access, understand and use to the greatest extent practicable by all customers, regardless of their age, size, ability or disability. This makes good business sense, as it should greatly reduce the post-installation support required by customers and make it easier for them to increase their energy efficiency, one of the aims of the smart metering project.

We are attaching both the research report and the technical guidelines to this submission and are available to present the material to CER / ESNB in more detail if requested.

In addition to the universal design aspect the National Disability Authority believes that the information that is proposed to be available via the Mandated In-Home Display could have a positive impact on the energy consumption of people with disabilities who are largely confined to their homes.

Information on consumption and peak use hours as well as some capacity to display the monetary or unit cost of the energy consumed would be very useful. This issue of energy consumption is also dealt with in the accompanying paper for the Pay As You Go consultation.

## **Smart Billing and Customer Web Interface**

As noted above, the CER consultation paper on the Presentation of Energy Usage Information concentrates on the type of information to be provided to the customer, with an emphasis on what is communicated rather than how it is communicated.

In 2012, the recommendatory document SWiFT 9:2012 ‘Universal Design for Energy Suppliers’ was published by NSAI, the National Standards Authority of Ireland. This standard provides guidance and requirements to energy suppliers on how to apply Universal Design in the development of accessible and usable products and services for household customers, such as the smart billing and customer web interface proposed in the CER consultation paper.

The [National Disability Authority’s Universal Design for Customer Engagement Toolkit](#) was developed to help organisations apply the guidance provided in the standard. It provides comprehensive best practice guidance on achieving better customer communication and provides organisations with practical and useful guidance on how to use Universal Design as a tool for better engaging with customers.