

# NCBI Submission to the Commission for Energy Regulation

August 2015

## Introduction

NCBI, the national sight loss agency, is a not for profit charitable organisation in Ireland which provides support and services nationwide to people experiencing sight loss. We also provide a range of services to public and private organisations to enable them to make their services accessible to people who are blind and vision impaired.

NCBI welcomes the opportunity to make a submission to the CER in relation to the roll-out of Smart Metering.

## Facts and Figures:

NCBI currently provides services to just over 18,000 people living with significant sight loss.

"The Cost of Sight Loss: The Economic Impact of Vision Impairment and Blindness in the Republic of Ireland", [1] which was commissioned by NCBI and published in September 2011, established that the number of people with mild and moderate sight loss, as well as total blindness, is far greater than previously thought and is on the rise as our population ages. In 2010, there were 224,832 people with impaired vision in Ireland. This figure is set to rise by 21% by 2020, when 5% of the population (or 271,996 people) will have a vision impairment. [2]

95% of people have mild or moderate sight loss, with 40% experiencing mild vision loss which will start when their level of vision no longer permits them to drive."

## References:

[1] Deloitte Access Economics, 2011, The economic impact of vision impairment and blindness in the Republic of Ireland, Report for NCBI, Dublin.

[2] (1) Jackson, AJ and O'Brien, C (2008) Eyes on the Future Ireland 2008 ([www.ncbi.ie/about-ncbi/ncbi-publications/eyes-on-the-future-report](http://www.ncbi.ie/about-ncbi/ncbi-publications/eyes-on-the-future-report))

With regard to the Smart Metering rollout, the most important issues for people with impaired vision are about accessibility: of the hardware, the software, and of information.

## **Hardware: the new meters.**

Buying a computer and smartphone, and learning how to use them, is difficult or impossible for some people with sight loss. Therefore it is important to ensure that the actual meter is as accessible as possible.

Equality legislation and the Disability Act support the view that if other customers can read their meters, they should be designed in a way that customers with impaired vision can also read them. This should be the case whether customers are partially sighted or totally blind, and whether they are Braille readers or not.

One way this could be achieved might be to have an Audible Reading, when you push a button.

It is important to ensure that accessibility is given high priority at the procurement stage. If no accessible models exist, then manufacturers should be encouraged to compete with each other to design and produce one, with the most accessible model winning the contract.

## **Software: mobile phone applications and websites.**

If it is not possible to make the actual meter 100% accessible, it becomes even more important to provide accessible alternative ways for customers with impaired vision to read the meter. However, whether or not the meters are accessible for all customers, websites on which information may be obtained about meter readings etc. must be accessible.

When providing a mobile 'phone application, please also ensure that it is accessible to as many people as possible.

It is important to note that an "app" which meets accessibility requirements, but is only suitable for the newest and most expensive smartphones cannot be considered truly accessible, as many people with impaired vision cannot afford expensive mobile 'phones. The app must be usable by the widest range of 'phones possible.

## **Accessible Information:**

It is proposed by the CER that energy suppliers must provide "a prompt to each customer not on a Time-Of-Use Tariff to promote transition to an

appropriate Time-Of-Use Tariff. The form, content and duration for such prompts shall be consistent with any CER Guidelines made for that purpose.”

NCBI would like reassurance that our previous recommendation that customers can specify the format for communication with energy providers will form part of the CER Guidelines for such “prompts”, as well as for **all other communications between energy providers and customers with impaired vision.**

Formats for communication with people with impaired vision include: email, large print (font size specified by each individual with impaired vision – different people need different font sizes), CD, text (some people have mobile ‘phones which can give audible readings of texts), telephone calls and Braille. Please note there is no “One size fits all” format for people with impaired vision. Each individual must be asked for their preferred format, and this should always be used when dealing with them, unless they ask for another format in specific cases / for specific purposes.

## **Data Protection:**

The same concerns apply to people with impaired vision as to others, with regard to Data Protection: consent should be requested before any sharing of data is permitted.

Consent to share with one group does not give energy providers the right to assume that consent will be granted to share the same information with another group.

## **Further Information**

NCBI would welcome the opportunity to elaborate on the issues raised in this submission. Please feel free to contact:

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