Response to DECC Smart metering Implementation Programme – a consultation on draft licence conditions and technical specifications for the roll-out of gas and electricity smart metering equipment August 2011

This response is made on behalf of:

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 30 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

Section (h) In- Home Display (IHD) Functionality

We are delighted to see that the Government plans to continue to work with interested parties, including Ricability, to develop a high-level list of accessibility and inclusivity design principles for adoption as best practice.

It is in our view essential that these principles are based on thorough usability research with consumers across a range of abilities. The research work that Ricability has carried out to date[1] with Consumer Focus provides an indication of the areas that might be included. It also notes the guidance that exists in other sectors, for example digital TV[2], however further research is needed to support the development of principles specific to IHDs.

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[1] **Getting to grips with smart displays** - An expert appraisal of the usability of in-home energy displays (Consumer Focus & Ricability 2011); **Usability of in-home energy displays for use with smart metering** - A research & literature review (Consumer Focus & Ricability 2011).

[2] ***Digital TV Usability and Accessibility Guidelines***, available from Digital TV Group . www.dtg.org.uk/publications

Question 50

Do you agree that the IHD should only be required to display ambient feedback based on energy usage? Please explain your answer.

Ricability is not aware of any detailed *comparative* research into the various types and combinations of ambient feedback on IHDs. Whilst it is clear that consumers can directly influence their usage level and only indirectly influence the cost, the benefits of having ambient feedback on one, or the other, or both has not been suitably investigated to determine which should be preferred. In our view the value of this can only be discovered by testing in realistic circumstances over a reasonable period to see which consumers might find easiest to use and prefer.

It is also important to note that while the 'traffic light' system may be just an example, many individuals struggle to distinguish the difference between colours and that embedding examples in specifications can sometimes be assumed to be the only answer, or at least the easy 'compliant' answer for manufacturers. It might be better to give a wider range of examples of ambient feedback including audible, visual or movement.

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