Sustainability *first*

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To: smartenergy@beis.gov.uk

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Please reply to:
Sharon Darcy, Director
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Dear Sir,

Consultation on Proposals regarding Smart Appliances

I am responding to this consultation on behalf of environment think tank Sustainability *First*. Sustainability *First* is a small charity that works in the energy, water and waste sectors. We have significant experience of consumer and public interest issues, regulation, the demand side and smart meter data (see www.sustainabilityfirst.org.uk). In particular, Sustainability *First* has carried out extensive work on domestic customer flexibility and demand side response, such as its multi-year project, GB Electricity Demand. We were pleased to see the paper Sustainability *First* co-wrote with Frontier Economics on demand side response in the domestic sector referenced in the consultation (footnote 12).

1.3. Do you agree that the Government should take powers to allow for regulation on standards for smart appliances?

In Sustainability *First*'s response to the BEIS Smart call for evidence, we argued that, whilst development of proprietary approaches to the 'connected home' seemed likely, in the long run we doubted that these will prove the most beneficial from a customer perspective. Consumers are more likely to benefit from development of open and interoperable approaches to the connected home. We would therefore support the Government taking powers to encourage this.

Labelling may well be a good way to engage consumers. But it will need adequate trialling to ensure effectiveness, in particular to ensure that the interests of those with special needs are taken into account.

4-7. Principles for regulation

We agree with the four principles for smart appliances and are pleased to see that cyber security has now been added to the list put forward in the Smart call for evidence as we recommended in our response.

In our response, we drew attention to a new multi-partner project 'Inspire', that Sustainability *First* was leading, exploring how innovative approaches, including smart approaches, could improve services for energy consumers in vulnerable circumstances and what the main enablers and barriers might be. This project has now been completed and its final report is available at

http://www.sustainabilityfirst.org.uk/inspire/reports. One of the report's conclusions was that the Government should consider adding an inclusivity standard to the four principles for smart appliances.

There is arguably a direct smart precedent for this in the accessibility requirement for the Smart Metering In-Home Display. There is a requirement that the In-Home Display is designed to enable the information displayed on it to be easily accessed and presented in a form that is clear and easy to understand including by consumers with impaired sight, memory and learning ability, perception and attention and/or dexterity needs. See the Smart Metering Technical Standards (SMETS) Chapter 6.3 p.96.

Vulnerability and therefore accessibility is not a minority issue. If appliances do not meet basic accessibility standards they are likely to be inaccessible to large numbers within the population. This is increasingly the case with a growing aging population who, while they may be able to use a smart appliance today, could find in a few years they are no longer able to.

The Project Inspire report found that, while companies are aware of the benefits of inclusive design, in practice this approach is not widely implemented. This is in part cultural, and due to misunderstandings about the potential cost. Some of those interviewed for the project reported that poorly designed products and services are exacerbating barriers to access.

Smart Energy GB's research also flags that an inclusively designed high quality installation service could meet the additional needs of many customers without singling them out as different, though flexibility to further tailor service for some vulnerabilities is still required. Having inclusively designed appliances means there is less need for specialist designed services (though some may always need these). This can end up being a much more cost-effective way of meeting the needs of all consumers.

Therefore, either an inclusivity standard or some other way of ensuring that the benefits of using smart appliances are properly available to all consumers and that the needs of more vulnerable customers are properly recognised is important. In this respect, the ten steps to 'smart for all' set out on pages 167-172 of the Project Inspire report are very relevant:

1. Ensure high-quality service for customers with additional needs
2. Maintain up-to-date privacy safeguards
3. Improve data access
4. Prioritise inclusive design
5. Ensure interoperability
6. Monitor smart products and services
7. Uphold the principle of universal service
8. Monitor and enable smart prepay innovation
9. Ensure products and services are affordable
10. Improve cross-government/utility co-ordination and integration.

Sustainability *First* is happy for this response to be made public.

Yours sincerely,

Sharon Darcy
Director