



Framework for the Provision of Smart Metering Support

1. Background

1.1. Smart meters can deliver significant benefits for energy consumers, including accurate billing and the information they need to take control over their energy use.

1.2. Research conducted early in the smart meter roll-out noted that:

“...older smart meter customers, those from lower social grades, those with the lowest total annual household incomes (below £16,000), those with no formal qualification and those who lived with someone who had a long-term health condition or disability were less likely to say the IHD was easy to use or to say they knew how to operate its different functions.”¹

1.3. The research further noted that some older respondents reported finding the information provided at the installation visit difficult to take in or overwhelming, while others felt that they may need further time and support to become familiar with the new technology. The research concluded that consumers from vulnerable, low income and prepayment groups are likely to need tailored support if they are to realise the full benefits of smart metering.²

1.4. At its meeting on 13 December 2016 the Smart Metering Implementation Programme’s Consumer Reference Group (CRG) agreed to establish a Post-Installation Support Group to develop a set of principles for the provision of support to vulnerable and pre-payment consumers. This paper reports on the discussions held within this Group and proposes the adoption of a framework for the provision of smart metering support, including a set of eight principles.

2. Scope and Purpose

2.1. The framework is specific to smart metering and was developed to ensure that: ***Customer journeys work well for all consumers, meet their expectations, and give them the confidence and ability to use their smart metering systems to manage their energy appropriately.***

2.2. The focus of the framework is on delivering outcomes, rather than prescribing how these should be achieved. It recognises that different approaches may be taken for different customer groups. In particular, it may not always be necessary to initiate new activities or processes, for example it may be appropriate to incorporate additional messaging within existing communication materials.

¹ DECC (2015) DECC’s Policy Conclusions: Early Learning Project and Small-scale Behaviour Trials.

² These groups included: householders with specific difficulties due to low levels of literacy/long-term illness/age or disability; tenants; low income consumers and pre-payment consumers. Source:

<https://www.gov.uk/government/publications/smart-metering-early-learning-project-and-small-scale-behaviour-trials>



Pre-Payment

- 2.3. It was noted by the Group that during the transition from traditional to smart pre-payment some consumers may require additional support and experience a transient period of vulnerability. This was highlighted in the Early Learning Research, which concluded that whilst in most cases pre-payment consumers felt that they had been provided with adequate instructions at the time of installation this had not translated into behaviours that enabled them to take advantage of new functionality (e.g. setting appropriate budgets).³
- 2.4. The Group agreed that pre-payment consumers, where identified as vulnerable, would be within scope as the framework was developed as these consumers are likely to require additional support to fully develop new behaviours.

Vulnerability

- 2.5. Definitions and strategies surrounding vulnerability recognise that consumers will have different needs and interests. Ofgem's Consumer Vulnerability Strategy therefore adopts a situational approach to vulnerability that focuses on those consumers who are significantly less able to protect or represent their interests in the energy market, may be significantly more likely to suffer detriment, and for whom that detriment is likely to be more substantial.
- 2.6. Obligations in relation to vulnerable consumers are outlined in energy supplier licence conditions⁴ and SMICoP⁵. The inclusion of 'Protecting the interests of consumers in vulnerable situations' is also one of five regulatory stances for Ofgem, who have introduced a broad vulnerability principle and the clear requirement for energy suppliers to identify and respond to the needs of domestic customers in vulnerable situations. As a result, all energy suppliers must take steps to identify consumers in vulnerable situations and take their needs into account, both in relation to 'business as usual' interactions and the installation of smart metering systems. In recognition of this and to avoid duplicating existing provisions, the framework developed by the Group will not seek to define vulnerability or impose additional requirements to identify vulnerable consumers. The framework will instead focus on the provision of support to those households where a need has been identified.
- 2.7. Smart metering can offer clear benefits for consumers in vulnerable situations. Information from smart meters, available to both consumers and suppliers, has the potential to foster healthier relationships with energy use and tackle inappropriate behaviours. This goes beyond messaging around energy saving to include the dangers of under-heating their homes and the importance of effective energy management (e.g. use of thermostatic radiator valves).

³ DECC (2015) Smart Metering Early Learning Project: Synthesis Report – Research conducted for DECC by the Environmental Change Institute (Oxford), the University of Ulster and the Tavistock Institute.

⁴ Supply Licence Condition 26 (Electricity and Gas) requires licensees to establish and maintain a Priority Services Register of its domestic customers who, due to their Personal Characteristics or otherwise being in a vulnerable situation, require specific services.

⁵ SMICoP defines a customer as vulnerable if, due to their Personal Characteristics or Circumstance, or otherwise being in a vulnerable situation, they may require Priority Services or additional support.



- 2.8. Valuable research has been undertaken by Smart Energy GB into the optimisation of the smart meter installation experience for audiences with additional barriers. This research gathered insight directly from consumers with a range of additional barriers, examining attitudes towards the installation process, consumers' views on what a high quality installation journey would look like to them, and practical recommendations about approaches to delivering the installation journey.⁶
- 2.9. In considering the needs of any consumer it is important to recognise that vulnerability can be complex, multidimensional and transitory. In addition, vulnerability is not just about the individual but how their circumstances and characteristics intersect with aspects of the market. Different consumers may be vulnerable in the context of the installation of a smart meter and use of an In-Home Display (IHD) than would be the case in their other interactions with their supplier, or their vulnerabilities may be expressed differently. For example, a consumer with depression or anxiety could be comfortable managing their account online and arranging payments, but may find the prospect of an installation visit or appointment booking call daunting and require support.⁷ It was therefore acknowledged by the Group that aspects of the smart metering installation process risked creating or exacerbating vulnerability, if they weren't handled appropriately.

Scope

- 2.10. The Group was established following recognition that some consumers will require additional support in order to realise the full benefits of smart metering. Where the framework includes references to offering and providing support to consumers this support should therefore be designed to enable smart metering benefits to be realised and to deliver the outcome stated in 2.1 (above). Whilst it may be appropriate to provide wider forms of support to some consumers, this is beyond the scope of this framework.
- 2.11. Whilst recognising the importance of delivering support, and enabling tools such as the Priority Services Register (PSR)⁸, the Group also noted the challenges that can be faced in identifying eligible individuals and households, the need for sensitivity when seeking information and the importance of encouraging individuals to 'self-serve' and respond to offers of assistance.
- 2.12. In light of this, the Group agreed that it would not be appropriate to limit engagement to pre-payment consumers and/or those who had previously been identified as vulnerable (e.g. through inclusion on

⁶ Optimisa Research for Smart Energy GB (2017) Research into the optimisation of the smart meter installation experience for audiences with additional barriers, available here: <https://www.smartenergygb.org/en/resources/press-centre/press-releases-folder/research-into-installation-experience?tab=1&docspage=2>

⁷ Smart Energy GB has conducted research on characteristics that may result in consumers facing a barrier to realising the benefits of smart metering: Smart Energy GB (2015) Smart energy for all. Available here: <https://www.smartenergygb.org/en/~media/SmartEnergy/essential-documents/essential-documents/english/Smart-Energy-For-All.ashx?la=en>

⁸ Suppliers, DNOs and GDNs have now created a common set of Needs Codes (which are the categories that allow you to register on to the PSR). These provide a common language to instigate simplified data sharing and allow the industry to gain a greater understanding of customers' needs so that the industry actions can be adapted to result in consistent positive outcomes.



an existing Priority Services Register). The framework outlined below has therefore been split into two sections:

- A. Awareness raising:** this section identifies activities that are relevant for a supplier's entire customer base⁹ and has been included to recognise that even in ideal circumstances it is not always possible to identify a consumer's needs during the appointment booking/installation. By raising awareness of support that is available to consumers and doing so in a way that highlights how this may benefit a household it is more likely that eligible consumers will opt-in.
- B. Enhanced support:** the second section recognises that for a minority of consumers additional steps are required to ensure that the outcome described in point 2.1 (above) is realised. In particular, these individuals will require reassurance where concerns arise and consideration will need to be given to how appropriate guidance can be provided at a time when it is most likely to be effective. The objective of this section is to enable consumers with additional needs to be as satisfied overall with their smart metering experience as the wider population.

2.13. The framework represents a minimum standard for the provision of support, but does not prescribe how this support needs to be delivered. In addition, it allows for innovation and the delivery of enhanced support by energy suppliers and other service providers.

⁹ The framework is intended to cover domestic customers only.



3. Awareness raising (Section A)

- 3.1. The focus of this section is on raising consumer awareness of available support, proactively offering it to those customers whose needs have been identified and encouraging households to 'self-serve' in relation to accessing this support.¹⁰
- 3.2. Support is more likely to be accepted where consumers are able to see the benefit and relevance to them and their household.¹¹ The principles outlined below encourage tailored and proactive messaging, drawing upon existing understanding of a consumer's needs (where relevant and possible). Notwithstanding this, suppliers should be sensitive to consumers' privacy, take into account a consumer's willingness to share their information and avoid taking any action that could cause distress.
- 3.3. In a recent review of Smart Metering Energy Efficiency Advice it was noted that framing advice messages around a practice or 'natural grouping', which could include daily routines or activities, may make more sense to householders than a series of random actions. This finding may also be applicable in relation to wider offers of support. Grouping measures and targeting interventions in this manner may help customers to identify behaviours that resonate with them, and avoids them prematurely dismissing advice viewed in the first instance as not pertinent or convincing.¹² Suppliers are therefore encouraged to consider creative approaches and to align messaging with events such as seasonal changes and changes in tenancy, where these are likely to increase receptiveness and stimulate appropriate behaviours.
- 3.4. Whilst the principles outlined below are applicable to suppliers' entire customer bases it should be recognised that this does not mean that the same delivery approach needs (or should) to be taken for all customers.

¹⁰ Research conducted for Ofgem concluded that, in general (not smart metering specific), consumers expect only a minimal service from their energy provider and have little awareness of any additional services that may be offered to them, or for which they may be eligible. Britain Thinks (June 2013) Vulnerable Consumers and the Priority Services Register: A report prepared for Ofgem by Britain Thinks.

¹¹ Research conducted for Smart Energy GB which explored willingness to disclose information found that broadly speaking those with 'circumstantial barriers' (e.g. prepayment/tenure/low income) find it easier to disclose information on their circumstances whilst those with 'personal physical barriers' (e.g. mobility impairment/blind or partially sighted) may be more reluctant; especially those with 'invisible barriers' (e.g. low literacy/learning disability). The research also showed that some participants with physical barriers are sometimes more willing to disclose if they can identify benefits to disclosure, such as priority services or adapted materials. Those with non-physical or 'invisible' barriers were more likely to query why they would need to let energy suppliers know about their situation and what they could or would do differently to accommodate them. Research into the optimisation of the smart meter installation experience for audiences with additional barriers; prepared by Optimisa Research for Smart Energy GB (March 2017).

¹² Smart Metering Energy Efficiency Advice Project; prepared by Ipsos Mori and Energy Saving Trust for DECC (January 2017). Available here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/587341/Review_of_Energy_Efficiency_Advice_Best_Practice.pdf



Section A: Raising Awareness

1. Suppliers use all appropriate points of contact with consumers during the smart meter installation journey to raise awareness of available support and identify customers who may benefit from these services.
2. Suppliers make at least one proactive contact with all consumers – in a manner which is appropriate to their communication needs and at a timely point following their installation – alerting them to sources of smart metering additional support and providing information on how to access this support.
3. Suppliers' communications relating to the provision of support highlights the benefits and take into account, where known and appropriate, consumer circumstances and those of their wider household.
4. Suppliers offer readily available support on an ongoing basis which is designed to engage consumers at times when messages are most likely to resonate and encourage action.



4. Enhanced Support (Section B)

- 4.1. The group recognised that not all consumers will need or welcome further support. Whilst the principles outlined in Section A are applicable to all consumers, this section focusses on the provision of support where a specific need has been identified. In these cases, the depth of support required will vary between consumers, with only a minority requiring the most enhanced provision.
- 4.2. Enabling consumers to easily make contact with appropriately trained individuals before the installation visit will provide reassurance and has the potential to increase consumer confidence and willingness to engage. Early and effective support may also reduce the likelihood of consumers contacting their supplier in the future with concerns or questions, thus contributing to the realisation of smart metering benefits for the industry. To be effective, this support must also both enable consumers to access information and provide opportunities for the development of practical skills in relation to the use of smart metering functionality and data.
- 4.3. These principles focus on active engagement and require steps to be taken beyond signposting and the provision of generic materials. Whilst support may be offered ‘in-house’ by suppliers, partnerships with third party providers and other trusted intermediaries may be necessary and may enhance the effectiveness of the support. This would enable consumers to draw upon existing support networks and could create safe environments in which people can ask questions and explore the opportunities offered by smart metering.¹³ This could include individuals and organisations trained through the Smart Energy GB in Communities programme. Although the scope of Smart Energy GB in Communities programme does not specifically include the post-installation period, participants have been trained to help people who may need additional support to understand the benefits of smart meters.

Section B: Enhanced Support

5. A dedicated point of contact is available for all consumers who require further support or information regarding smart metering, including anticipated timescales for the resolution of any issues, both before and after the installation visit. When making contact through this channel consumers are able to engage quickly and easily with trained individuals, who are able to deliver support in a way that is appropriate for the consumer’s needs.
6. Suppliers establish relationships with local and community providers of smart metering support and actively refer consumers to them for further support where a need is identified.
7. Suppliers make available appropriate and timely one-to-one support following the smart meter installation and consumers are actively contacted with an offer of support where a clear need is identified.

¹³ Community group demonstrations and workshops were specifically identified in research conducted by NEA as effective vehicles for delivering support. NEA (September 2014) Developing an Extra Help Scheme for vulnerable smart meter consumers; research undertaken by NEA for Citizens Advice



8. Support is tailored to the customer's needs and designed to enable them to improve their understanding of their energy use, tackle misconceptions regarding energy and take appropriate action to manage their consumption.

4.4. The support outlined above will be dedicated to vulnerable smart meter consumers during the smart meter roll-out. Support for vulnerable customers beyond the roll-out will be a matter of suppliers' BAU procedures.