

28 February 2013

Smart Meter Task Force
Resources and Energy
NSW Trade & Investment
GPO Box 3889
Sydney NSW 2001

Dear Task Force

I am writing on behalf of the Disability Council NSW in response to the Smart Meter Discussion Paper. The Disability Council NSW (the Council) is established under Section 16 of the *Community Welfare Act 1987* to advise the NSW Government on issues affecting people with disability and their families. The Council appreciates the opportunity to provide comments on the Discussion Paper.

The Council understands that Smart Meter allows price signals to be given to people who may choose to shift their power usage to lower tariff times. This has the potential for consumers to better manage their electricity usage and exercise greater control over their energy bill. However, Council strongly supports the decision to NOT have a mandatory rollout of Smart Meters there may be negative implications for some people on low incomes who have less control over their electricity usage. Council focuses its comments specifically on how Smart Meters will impact on people with intellectual disability.

People with intellectual disability are not a homogenous group. They live in a wide variety of domestic situations including:

- 1) with parents/family
- 2) in a group home
- 3) in institutions
- 4) in boarding houses
- 5) in privately rented flats or houses
- 6) in public housing
- 7) in their own home

The other relevant variable is the support structure they have, which can range from none at all, to informal family/carer support, to drop-in support, to twenty-four hour in-home support, and everything in between.

Depending on people's domestic situations and support structure, their interactions with domestic bills may vary significantly. Some have complete control and responsibility for paying, within a continuum that ends with people having no control over their usage or their payment.

The recent paper by the Public Interest Advocacy Centre (PIAC) titled *More Power to You: electricity and people with physical disability* highlighted many issues facing people with physical disability as they face rapidly rising energy bills, and some particular issues relating to Smart Meters. Some physical impairments require continuous use of life-saving equipment such as oxygen supplies, feeding pumps, and air-conditioning in cases of inability to self-regulate temperature. Other issues raised were the general strain of rising prices where both pensions and subsidies are indexed to CPI, and the inability of people receiving supports to shift that support to times of lower energy costs - one of the heralded advantages of Smart Meters and the associated time-of-use tariffs.

These issues apply also to different sections of the population of people with intellectual disability.

People with Profound Disability

People with profound intellectual disability often use wheelchairs, and life-support systems associated with medical conditions. They typically have no interaction with or control over energy usage, or the payment of bills. Their carers will have varying levels of interest in reducing power bills on their behalf.

In this respect, they reflect the position of people with physical disability described by PIAC. The introduction of Smart Meters and associated time-of-use tariffs would impose extra costs on people unable to shift their energy use to a low-tariff time.

People living in Institutions and boarding houses

People in institutions and boarding houses typically pay board inclusive of power bills. They have no control over the type of heating/air-conditioning/hot water systems that are installed and little ability or inclination to moderate their usage. Boarding house managers may impose restrictions for economic reasons, but this would be for their benefit, not the residents'.

People living with parents and in group homes

In these living situations, the paid staff or family, usually deal with utilities, appliance selection and monitoring energy usage – switching lights off, short showers, closing doors etc.

As such, their interaction with Smart Meters would mirror that of the general community, except where the comments on automatic switch off of air-conditioning (see below) apply to them.

People living in the community, with or without in-home support

There are a number of issues for this group, who live independently, with or without support, and may be vulnerable to changes in the way their lives interact with society. They inhabit a social space that is close to the divide between dependent and independent, between success and failure, between comfort and going broke, between health and illness. In addition, formal supports for this group are very limited and/or difficult to obtain. Small changes that are absorbed and dealt with by the general population can easily tip this group "over the edge" and impact disproportionately on their lives. Below are some particular concerns:

1. The Smart Meter technology allows for electricity suppliers to have control over power usage including the ability to selectively turn off appliances such as air conditioners at certain times. However, when air conditioners are turned off for a period using the smart meter, resuming power supply does NOT automatically start the air conditioner. Family or support staff could no longer leave a person alone with the air conditioner on and expect that it would stay on. People with disability don't always respond to their environment and may be at risk. For a small number of people, this may mean the difference between independent and supervised life.

Case study: Donna is 35 years old, and has Down Syndrome. She lives with her parents, who occasionally leave her "in charge of the house" for up to four hours or so. Part of making her safe involves leaving the air conditioner on, on hot days. Without it, the house rapidly becomes unbearably, perhaps dangerously hot. The danger is that she would not think to re-start the air-conditioning after it had been switched off. The resumption of power supply does NOT automatically re-start modern air-conditioners.

The Council is uncertain whether the proposed Smart Meters for NSW included the ability to remotely switch off major appliances like air conditioning by the power supplier, as part of their peak-demand management. Nor is it clear if this is an elective facility, controllable by the customer. So whilst there may be some advantage to customers with intellectual disability in using the Smart meters, there are dangers if that usage surrenders control over air conditioning to the power company.

2. As noted in PIAC paper, people receiving in-home support cannot move times of drier/washer use to off-peak periods, but must use the appliances when the support service is delivered.
3. People with intellectual disability may be confused by conditional statements, and changes in routine. Their ability to respond to periodic high tariffs on days of high demand is limited. They often do not access emails or SMS, the mooted means of communicating short-term tariff changes to customers. Some also respond to suggestions in a literal way, and may leave themselves in uncomfortable situations in complying with 'official' requests to "not use air conditioners", for example, on hot days.
4. PIAC's comments on the lack of indexing of energy rebates/subsidies apply equally to people with intellectual disability, who are on low incomes, have a lower work participation rate, and do not have the resources to understand or take advantage of rebates, subsidies, and time-of-use charging systems when they are advertised.
5. People with intellectual disability are constricted in their ability to purchase energy-efficient large appliances. As PIAC notes, these tend to be replaced when the old one breaks down, and not as part of a planned program. They have difficulty accessing even low-interest loans because of the repayments, and they rely on public transport and have low computer usage, making comparison shopping difficult.
6. The roll-out of Smart Meters may involve door-to-door representatives on commission for the number of sign-ups they achieve. Past experience shows that

they often sign up people with disability who do not understand the implications of what they are signing.

In light of the abovementioned concerns the Council recommends the following:

1. That Smart Meters are not to be made mandatory but offered on an opt-in basis.
2. That a mechanism be developed to allow vulnerable customers to avoid automatic turn-off of appliances.
3. That strategies be developed, including monitoring and staff training to ensure that vulnerable people are not pressured by door-to-door salespeople into signing up where it is not in their interest to do so. For example, a usage and cost comparison is conducted before recommending Smart Meters to individuals to ensure that they won't be worse off.
4. That subsidies be widely promoted, including among non-English speaking communities and disability networks, to ensure that disadvantaged individuals receive adequate financial support.

Please do not hesitate to contact me should you require further information on the matters raised in this letter.

Yours faithfully



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Chair, NSW Disability Council