



Commissioner for Older People
for Northern Ireland

10th December 2024

Department for the Economy
Adelaide House
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By email: WholesaleElectricityNetworks@economy-ni.gov.uk

RE: Smart Meters Design Plan Consultation

I am writing on behalf of the Commissioner for Older People for Northern Ireland (COPNI) regarding the consultation on the rollout plan for smart meters in Northern Ireland. The Commissioner is highly invested in this issue, recognising its significant potential to improve energy efficiency for households and society. However, the Commissioner also understands that the risks associated with smart meters—some of which have occurred in other UK jurisdictions—must be thoroughly examined by the Department both before and during the rollout.

COPNI acknowledges the value of smart meters in supporting the transition to Net Zero and in fulfilling the goals of the Climate Change Act (Northern Ireland) 2022, which calls for increased electricity consumption from a diverse range of renewable sources.¹ Smart meters have the potential to enhance energy efficiency and to optimise electricity usage when conditions are favourable—such as on windy days²—benefiting suppliers, consumers, and the environment.

However, the experience of implementing smart meters in other regions, including within the UK, has not been without challenges. Some issues have disproportionately impacted vulnerable consumers, who rely on access to electricity as an essential resource for health and general well-being. Among these vulnerable groups, older people are particularly at risk. This response will briefly discuss issues identified in other jurisdictions, evaluate how they can

¹ See Department of Agriculture, Environment and Rural Affairs, [The Climate Change Act \(Northern Ireland\) 2022 - Key elements](#).

² See Department for the Economy (2024) [Consultation Paper - Smart Meters Design Plan](#), section 4.7.

impact vulnerable consumers, and assess whether the consultation document addresses these concerns adequately or if further action is needed from the Department and Oversight Group.

Older people's increasing vulnerability

Fuel Poverty is an **older people's issue** in Northern Ireland. According to the House Condition Survey (HCS), nearly four in ten households (37.7%) with a Household Reference Person (HRP) over the age of 75 experience fuel poverty.³ The likelihood of experiencing fuel poverty increases with age: the HCS found that older households have a fuel poverty rate twice as high (33.9%) as that of adult households (16.6%) and households with children (15.1%).⁴

Fuel poverty experienced by older households may worsen due to cuts to the Winter Fuel Payment, especially among the most vulnerable. Since the Winter Fuel Payment is now tied to Pension Credit eligibility, it excludes extremely vulnerable individuals who are not receiving Pension Credit. Notably, the Department for Communities reports that 28% of those entitled to Pension Credit—around 26,300 individuals—do not claim it, often because they are unaware of available support.⁵

Older households also tend to have significantly lower income after housing costs (AHC) than other age groups. According to the Office for National Statistics (ONS), UK households where the main earner is over 60 have an income 22% lower, on average, than those led by younger adults.⁶ Specifically, the income of households with a primary earner over 60 is 17.8% lower than those aged 30–39, 26.6% lower than those aged 40–49, and 25.8% lower than those aged 50–59.⁷ In Northern Ireland, the Family Resources Survey reports that 58% of pensioner households have an income below £500 per week after housing costs, compared to only 26% of working-age households.⁸ This points at a **drastic reduction in income after retirement** and suggests that older people are more likely to struggle when the cost of living rises.

For these reasons, the Commissioner is concerned that without appropriate safeguards, older people could face disproportionate disadvantages and risks with the introduction of smart meters. While the consultation document assures that lessons from other jurisdictions have been considered, some critical issues remain unaddressed. The Commissioner urges the

³ See Housing Executive, [House Condition Survey 2016: Main Data Tables \(Excel Format\)](#).

⁴ See Housing Executive, [House Condition Survey 2016: Main Data Tables \(Excel Format\)](#).

⁵ See Department for Communities, [Pension Credit: Estimates of Benefit Take-up - 2019/20](#).

⁶ See Office for National Statistics, [Household disposable income by age group 2022](#).

⁷ See Office for National Statistics, [Household disposable income by age group 2022](#).

⁸ Data obtained from the Family Resources Survey through the [UK Data Service](#). Household Dataset, Northern Ireland, Household total, Gross Income from all sources (in bands with 100 widths) in latest prices (weekly, CPI adjusted real terms), by Type of adult of the head of the household (Working Age or Pensioner).

Department and the Oversight Group to prioritise these concerns to protect older people and other vulnerable consumers effectively.

Will older consumers be worse off?

Smart meters are instrumental in helping achieve net-zero goals by promoting more efficient household energy consumption. In principle, this is a positive development. In a world where technology enables greater efficiency, including in energy usage, it seems sensible to educate consumers on how to optimise their energy consumption.

However, concerns arise for those who may be disadvantaged by these changes, particularly those who face barriers due to technological or digital illiteracy, among which older people are the most prevalent, or who lack the flexibility to modify their energy usage patterns. These individuals could find themselves in increasingly vulnerable situations as smart meter adoption becomes widespread.

Older people generally have lower digital skills and limited online presence. According to the UK Consumer Digital Index 2023, digital capabilities decline significantly with age: 13% of the UK population have 'ultra-low' digital skills, two-thirds of whom are over 70.⁹ Among those over 65, one in five lacks internet access at home,¹⁰ and only 54% of people over 75 are regular internet users.¹¹ Additionally, 40% of individuals over 70 do not use the internet—a figure even higher among those living alone with limiting conditions.¹² Northern Ireland, in particular, has consistently reported the UK's lowest internet usage rates, with only 88% of its population online in 2020.^{13 14}

Therefore, while COPNI supports the incentives that smart meters offer to active, digitally skilled consumers through dynamic pricing and lower tariffs, two specific concerns arise:

1. **Accessibility and usability:** Vulnerable households, especially those with older adults who may be less familiar with digital devices, may struggle to effectively engage with smart meters or its associated apps. The use of smartphones, laptops, or in-home devices to track and adjust energy consumption may be challenging for older people, who have lower digital skills. This can limit their ability to actively manage their energy use and, consequently, to save money.

⁹ See Lloyd's Bank, [2023 Consumer Digital Index. The UK's largest study of digital and financial lives.](#)

¹⁰ Ofcom (2022) [Media Literacy 2021 CATI Omnibus Survey Data Tables.](#)

¹¹ ONS (2021) [Internet users, UK: 2020. Internet use in the UK; annual estimates by age, sex, disability and geographical location.](#)

¹² Ofcom (2022) [Digital exclusion. A review of Ofcom's research on digital exclusion among adults in the UK.](#)

¹³ ONS (2021) [Internet users, UK: 2020.](#)

¹⁴ ONS (2019) [Exploring the UK's digital divide.](#)

2. **Flexibility in energy usage:** Some households simply lack the flexibility to alter their energy consumption patterns. Those with inflexible schedules or who do not own modern appliances (such as programmable washers or dryers) are unable to take advantage of lower-cost energy periods. Suggesting that smart meters will enable them to save money may be unrealistic for these consumers.

These issues would be manageable if there were no risk of increased costs due to smart meter adoption. However, the possibility of rising prices for some in conjunction with lower ones for others through dynamic pricing—which was once dismissed as a “myth”¹⁵—is now a genuine concern. Ofgem’s recent consultation and open consideration of a “dynamic” pricing that would include lifting price caps during periods of high demand can expose vulnerable consumers to higher costs as part of the push towards net zero.

As part of the discussion paper, Ofgem has set out a range of options for the future of the price cap, including introducing a more dynamic cap with time-of-use dependent unit rates to encourage consumer flexibility.¹⁶

Given these concerns and considering that the Department’s consultation document remarks that dynamic tariffs will be at the core of the system in Northern Ireland, COPNI strongly advocates for clear and unequivocal protections in the smart meter rollout plan to safeguard vulnerable consumers. While the consultation document indicates a tentative intention to address this issue (sections 4.8 and 4.9 of the consultation¹⁷), COPNI urges a firm commitment that ensures vulnerable consumers are not penalised—regardless of whether they use smart meters or have the flexibility to adjust usage. They should not be at risk of subsidising cheaper energy for more privileged consumers who can access lower rates during off-peak hours, regardless of whether they are on a dynamic or flat-rate tariff.

Safeguards for customers: remote switching

Drawing from the recommendations of the report that LCP Delta completed for the Department,¹⁸ the consultation document argues that consumer protection, particularly the protection of vulnerable consumers, should be central to the roll out of smart meters.¹⁹ This commitment is welcomed, but there are concerns over the level of attention paid in the consultation document to well-documented issues with the roll out of smart meters in other jurisdictions that affect consumer protection. One of the most controversial issues that emerged during the

¹⁵ See for example the EDF Energy smart meters “myth” list ([7 Smart Meter Myths Busted | Truth About Smart Meters](#)), or Smart Energy GB [Do smart meters cost more?](#).

¹⁶ See [Ofgem launches discussion on the future of the price cap](#).

¹⁷ See Department for the Economy (2024) [Consultation Paper - Smart Meters Design Plan](#).

¹⁸ See Department for the Economy (2024) [LCP Delta, Northern Ireland Smart Electricity Metering Design Plan](#).

¹⁹ See Department for the Economy (2024) [Consultation Paper - Smart Meters Design Plan](#), section 4.

rollout of smart meters in England was the power they granted to energy suppliers. This technology allows suppliers—in certain instances—to bypass court proceedings in cases where customers have fallen into debt, directly switching them to a prepayment meter without permission. In such cases, suppliers could potentially cut off power if debts remain unpaid.²⁰

The LCP Delta report highlights these concerns, documenting cases in Great Britain where energy providers remotely switched customers to prepayment without their consent, resulting in higher tariffs²¹—higher tariffs also apply to prepayment customers in Northern Ireland.²² The report stresses that this has left some households without power for days or even weeks, placing them at risk of running out of energy entirely. According to the report, smart meters offer suppliers a much easier path to enforce these changes compared to the previous requirement of obtaining a warrant to install a physical meter.

Despite repeated warnings from Ofgem urging suppliers to “use the remote switching facility fairly and appropriately,” LCP Delta concludes that suppliers often failed to communicate with customers before making these switches, as they were meant to do.²³ The power given to providers over customers’ contractual obligations introduces serious risks. For instance, if a supplier lacks accurate customer data, the power might be cut off without warning.²⁴ This is not a minor concern, as “fuel debt” was in 2023 the most common reason for debt advice from Citizens Advice in Great Britain²⁵—ahead of council tax arrears, rent arrears, credit, store & charge card debts, or Bank & building society overdrafts. Safeguards are essential in this regard.

Alarming, the Department has not incorporated any relevant safeguard in the consultation document that relates to remote switching, even though most other LCP Delta recommendations have been accepted (see Section 2.1 of the consultation document²⁶), raising questions over the Department’s attitude to this issue. However, COPNI understands that the risks and documented issues related to smart meter rollout in England, together with the recommendations from LCP Delta, create a strong case for the Department to undertake further research into remote switching. These concerns should not be overlooked, given the complex social implications involved.

²⁰ See Department for the Economy (2024) [LCP Delta, Northern Ireland Smart Electricity Metering Design Plan](#); Haynes, T. (2024, November 12th) [Do you have to have a smart meter?](#), The Telegraph; Switchcraft.co.uk (2023, August 4th) [Disadvantages of smart meters](#).

²¹ See Smith, R. W. (2022, November 9th). [Energy firms remotely swap homes to prepay meters](#). BBC News.

²² See Consumer Council for Northern Ireland, [Electricity Price Comparison Table](#).

²³ See Department for the Economy (2024) [LCP Delta, Northern Ireland Smart Electricity Metering Design Plan](#)

²⁴ Switchcraft.co.uk (2023, August 4th) [Disadvantages of smart meters](#).

²⁵ See Office for National Statistics (2023) [How are financial pressures affecting people in Great Britain?](#) Safeguards are essential in this regard.

²⁶ See Department for the Economy (2024) [Consultation Paper - Smart Meters Design Plan](#), section 4.

Technical issues and the need to protect vulnerable consumers

The experience in Great Britain highlights ongoing technical issues with smart meters that require continuous monitoring before and during the rollout. As previously discussed, these technical problems disproportionately affect vulnerable consumers.

Existing reports indicate that by the end of 2023, one in five smart meters in Great Britain were non-functional.²⁷ This included four million smart meters that were not operating in “smart” mode and many others sending incorrect readings or malfunctioning in-home displays.²⁸ The consequences of these faults are significant: consumers often face estimated bills, which can result in overcharging—leading to financial difficulties and with customers often finding it difficult to get their money back—or undercharging—and consumers going into debt.^{29 30} In addition, as stressed in the previous section, while such issues are being resolved, suppliers have the power to automatically switch a customer’s meter to prepayment mode, and potentially to disconnect their power.³¹

Safeguards are essential to address these possible and likely faults in the smart meters’ system. These technical problems can have both immediate and long-term impacts, especially for older consumers. Dynamic tariffs, while beneficial for tech engaged users, may discourage older people from using energy when they need it. Traumatic experiences, such as pensioners being billed thousands of pounds for energy use, have been widely reported in Great Britain³² and can lead to a fear of using energy at all. This is a serious concern, as older consumers often rely on energy for their health and safety. Protection measures for these vulnerable individuals must be robust, and this issue must be a priority for the Department and the Oversight Group, as it is not sufficiently addressed in the consultation document.

In addition to technical issues, security concerns have been raised by the LCP Delta report. The consultation document shows no evidence of decisions or studies aimed at ensuring the safety of the smart meter rollout in regard to some of these. A major security concern is the remote “off switch” functionality of smart meters, which has been criticised for requiring excessive security relative to its value (Sections 4.4 and 6.2.2 of the LCP Delta report³³).

²⁷ Citizens Advice (2023, May 23) [Millions missing out on smart meter benefits due to faults and poor supplier service, warns Citizens Advice](#).

²⁸ Potts, L (2024, March 26) [How do smart meters work and how do I know if mine is broken?](#), BBC News.

²⁹ Hattenstone, A. (2024, March 26) [Smart meter figures: Nearly four million not working properly](#), BBC News.

³⁰ Fuel and energy debt are without a doubt an increasing issue, especially for older people who are more likely to experience fuel poverty (See Housing Executive, [House Condition Survey 2016: Main Data Tables \(Excel Format\)](#)). In 2023, “fuel debt” became the most common reason for debt advice from Citizens Advice in Great Britain, up from fifth place in 2019 (Office for National Statistics (2023) [How are financial pressures affecting people in Great Britain?](#)) Safeguards are essential in this regard.

³¹ See Department for the Economy (2024) [LCP Delta, Northern Ireland Smart Electricity Metering Design Plan](#).

³² Hattenstone, A. (2024, March 26) [Smart meter figures: Nearly four million not working properly](#), BBC News.

³³ See Department for the Economy (2024) [LCP Delta, Northern Ireland Smart Electricity Metering Design Plan](#).

The LCP Delta report makes several recommendations regarding the remote “off switch”.³⁴ The issues with these functionalities should be addressed from the outset, focusing on vulnerable customers (Section 4.4). It emphasises that remote disconnection requires significant cybersecurity measures and recommends an economic assessment of these costs. It also offers the safe and cost-effective alternative of dispatching an engineer to deactivate the meter locally. In Northern Ireland, where disconnections are rare, the cost-effectiveness of remote disablement should be carefully evaluated. Sending an engineer to manually disconnect the meter may be more efficient if disconnections remain infrequent (Section 6.5). However, the consultation document neither endorses nor rejects the inclusion of the remote switching functionality, suggesting a lack of thorough consideration of this serious security concern raised by the LCP Delta report, and deferring them to future consideration by the Oversight Group.

To ensure effective protection for consumers against technical and security issues, the commitments outlined in Section 4.19 of the consultation document must be fully developed and guaranteed. At this stage, it is not possible to assess how vulnerable consumers are being safeguarded as the consultation document appears to defer this responsibility to the future work of the Department and the Oversight Group. However, without robust protections in place, vulnerable consumers risk being left in a precarious position.

Conclusion

The Commissioner for Older People for Northern Ireland firmly believes that technology has the potential to improve lives across all areas of society. As Northern Ireland’s population ages, technology can enhance service efficiency for everyone, particularly benefiting older people in critical areas like health and social care, transport, safe housing, and accessibility to public spaces. A more efficient energy use represents an excellent example of the many benefits of a technologically driven world.

However, as with any innovation, technology that transforms energy usage and reshapes interactions between consumers and providers must be implemented in a way that benefits everyone—not just some. Without appropriate safeguards, new technologies can potentially—often inadvertently—harm vulnerable groups. In the case of smart meters, while COPNI recognises the potential benefits of smart meters, the rollout must be thoughtfully designed to address issues observed in other regions, especially those highlighted by the experience of Great Britain.

COPNI is supportive of the smart meter initiative and trusts that the Department will carefully address concerns raised by stakeholders, reported in the media, and documented in the

³⁴ See Department for the Economy (2024) [LCP Delta, Northern Ireland Smart Electricity Metering Design Plan](#).

expert advisory report from LCP Delta. Rolling out smart meters without thoroughly addressing these issues would be irresponsible and could expose vulnerable groups to unnecessary risk.

Best regards,

Ángel

A handwritten signature in blue ink, appearing to read 'Ángel Leira Pernas', written over a light blue circular stamp or watermark.

Dr Ángel Leira Pernas
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Commissioner for Older People for Northern Ireland