Energy UK

The voice of the energy industry

Energy UK response to the Ofcom Consultation: Licence Exempt Short Range Devices in the 870 to 876 MHz and 915 to 921 MHz Bands: Technical Proposals

Energy UK is the trade association for the gas and electricity sector, representing a wide range of interests and driving forward the debates on the UK's strategy for achieving a low carbon, secure and affordable energy future. It includes small, medium and large companies working in electricity generation, energy networks and gas and electricity supply, as well as a number of businesses that provide equipment and services to the industry. Energy UK welcomes the opportunity to respond to this consultation on behalf of the members of its Supplier Requirements for Smart Metering project group.

Energy UK is a key stakeholder in the UK smart meter rollout led by the UK Department of Energy and Climate Change (DECC).

DECC supports the need for access to these new bands for Smart Meters. This was stated in its letter to the CEPT SRD/MG meeting #58 in Helsinki April 2013 (SRDMG(13) Info 15). The UK smart meter roll out of over 53 million smart meters would greatly benefit from the use of the spectrum in the new sub-bands g2.1 and g3.1 in Annex 1 and new sub-band c in Annex 2, should these become available through the UK National Radio Interface document. Energy UK is working in the ZigBee Alliance to facilitate delivery of an open standard for these sub-bands for use by smart metering devices wherever they are permitted in Europe.

Energy UK supports the Technical Proposals set out in Ofcom's the Consultation entitled "Licence Exempt Short Range Devices in the 870 to 876 MHz and 915 to 921 MHz Bands: Technical Proposals" of 18th December 2013.

ER-GSM

We expect extensive use of the annex 1 g2.1, g3.1 and annex 2 c sub-bands for smart metering in GB over the next few years. In dense residential deployments such as low rise blocks of flats both coverage and capacity are a challenge.

We note that Ofcom are reserving the top half of the 870-876 and 915-921 MHz bands from SRD use except at such a low duty cycle that it is not useable for smart metering. These low duty cycle limits are following the CEPT recommendations for countries which deploy ER-GSM. The co-existence study is contained in ECC Report 200.

Allowing SRDs use of these reserved parts of the bands would allow the conventional single hop radio solutions for smart metering to work at a greater proportion of premises, particularly in dense deployments. This would reduce the cases where alternative HAN solutions are required and avoid the additional cost of those solutions that would ultimately be borne by consumers.

Energy suppliers are targeting to start rollout of Smart Meters in these bands from Q1 2016. We request that Ofcom remove the special ER-GSM restrictions in the g2.1, g3.1 and annex 2 c bands before then. This would allow the equipment to be configured to make use of the full bands.

As an alternative approach, we note our understanding that EN 303 204 v 0.6.1 reserves these channels but allows these channels to be used for other purposes in accordance with a coordination procedure with the railway operator. The smart metering solution will have the ability to remotely deploy a channel plan (to add or remove channels in use in individual HANs). We believe that it should be acceptable for smart metering to use these reserved parts of the bands, and to then coordinate with the railway operator should they make use of these bands, and for smart metering to avoid using channels in parts of the country where the railway operator is using those channels. We ask, does Ofcom agree that this approach is sound?