Your response

Question

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We invite interested parties to provide feedback on the Roadmap.

Energy UK welcomes the opportunity to respond to this consultation. We are supportive of Ofcom's work on future spectrum demand for the utilities, given the criticality of spectrum to the energy industry (including smart and advanced metering communications infrastructures and wider networks infrastructures) and the delivery of the UK's Net Zero transition.

It is essential Ofcom takes account of the specific types of connectivity required by the energy sector, particularly resilience and coverage. The evolution and efficiency of communication technologies will be key to supporting future ambitions.

Energy UK encourages Ofcom to continue to engage with key stakeholders in the energy industry on the spectrum review, including BEIS, Ofgem and relevant key industry bodies as the work progresses. Energy UK would be happy to support and engage with Ofcom as the need arises.

Specific suggested areas for Ofcom consideration:

- The smart metering infrastructure uses public mobile networks to provide connectivity to industry and energy consumers. As a key enabler for the Net Zero transition and the future energy system, it is important the smart metering infrastructure use of spectrum has an appropriate level of visibility and weight in Ofcom's work.
- The energy sector (including smart metering) relies on 2G and 3G connectivity provided by mobile networks. The DCMS announcement in December 2021 (for 2G and 3G sunsetting by 2033) has significant implications for the energy industry as the challenge and costs of managing a transition to later technology generations for IoT type applications is complex and will require replacement of equipment in energy consumers' premises. We would suggest Ofcom's roadmap considers how such transitions are managed in a way that will protect consumers and existing spectrum users, given the different timelines for 2G and 3G sunsetting; especially as earlier sunsetting of 3G will have implications on existing 2G connectivity (e.g. potential risks around capacity and performance). Energy UK has been engaging closely with BEIS, in respect of the smart metering implementation programme, to consider challenges in this space as a result of the DCMS sunsetting announcement and we would welcome the opportunity to work closely with Ofcom, alongside BEIS, to further consider specific aspects where required.
- A range of connectivity requirements in the energy sector will be reliant on mobile networks, which are broader than consumer data connectivity. Therefore, it would be helpful if Ofcom takes this broader view of connectivity requirements into account when setting policy,

- e.g. this could be reflected in defining coverage objectives for the mobile telecoms sector and/ or in the information it provides on network performance.
- Wi-Fi connectivity is widely used in the energy sector; we support
 Ofcom's work in this space. Key to the energy sector will be the need
 to ensure existing Wi-Fi use remains effective and that any congestion
 related issues are appropriately addressed.

Please complete this form in full and return to spectrum.roadmap@ofcom.org.uk.