

Energy UK response to the Public Sector Spectrum Release (PSSR) Technical coexistence issues for the 2.3 and 3.4 GHz award

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).

Energy UK are responding only on the implications to smart metering.

Energy UK understand the evidence presented by Ofcom shows that the impact to smart metering from 2.3 GHz LTE interference would be low, and that this has been considered collectively by DECC and Ofcom.

However, we would note that the consequences of interference from a 2.3 base station could be that smart metering systems using ZigBee at 2.4 see a drop in performance or failure to operate. Furthermore, that failure and the reason for it will not necessarily be obvious to the owners of the equipment. For this reason, energy suppliers may be reliant on performance degradation being reported including consumers reporting and IHD failing to show up to date information.

Identification the reasons for failure is made even more difficult because any one Energy Supplier may own only a small proportion of the devices in an area. This makes it more difficult to identify emerging failure patterns. In the absence of any additional supporting information a supplier will have no choice but to investigate the reasons for the loss of performance on a case by case basis. Any such investigation could be made much more efficient if suppliers are made aware of the location of 2.3 MHz base stations.

For the reasons outlined here, we therefore recommend that as a condition of granting this change there should be a requirement to collate location information for LTE base stations and that this information should be maintained and available to Energy Suppliers, the DCC & their CSPs. This would reduce costs of investigating smart meter HAN failure. We note that this information could be anonymised for suppliers to protect the commercial interests of the LTE operators. The availability of this information to suppliers would save investigation and site visit costs that would otherwise be spread amongst consumers.