Your response

Question	Your response
Do you have any comments on our proposals?	**About Energy UK** Energy UK is the trade association for the energy industry with over 100 members spanning every aspect of the energy sector – from established FTSE 100 companies right through to new, growing suppliers and generators, which now make up over half of our membership. We represent the diverse nature of the UK's energy industry with our members delivering over 80% of both the UK's power generation and energy supply for the 28 million UK homes as well as businesses. The energy industry invests £13bn annually, delivers £31bn in gross value added on top of the £95bn in economic activity through its supply chain and interaction with other sectors, and supports 738,000 jobs in every corner of the country. **Our Response** We are pleased to have the opportunity to respond to this consultation. Energy UK is particularly supportive of the proposal to implement a formal project to consider 2G/3G sunsetting. There is the risk of significant impact to energy suppliers, energy consumers and other industry partners if 2G/3G sunsetting is not carefully managed. 2G/3G is currently relied upon by energy suppliers for wide area communication that supports Critical National Infrastructure such as Smart and Advanced Metering. Energy suppliers have installed and continue to roll out tens of millions of smart metering systems using this technology, into the homes and premises of domestic and non-domestic consumers. It is therefore important that any transition to newer or next generation technologies is undertaken in a way that is not detrimental to these important elements and the wider benefits they support. This is especially relevant to potential impacts on the cen-

	tral communication infrastructure for smart metering systems managed by the Data Communications Company (DCC) and regulated under licence from Ofgem underpinned by the Smart Energy Code within the regulatory framework. Additionally, it should also be noted that smart metering systems using 2G/3G technologies are installed with an operational life of 15 years such that the logistical challenge to transition to different wide area communications technologies is significantly different for energy suppliers, than for other sectors using 2G/3G technologies. It is therefore important that the requirements of the energy industry are factored into Ofcom's considerations alongside those for other 2G/3G users. We look forward to engagement on 2G/3G sunsetting project, the associated issues and resolution options. We would also urge Ofcom to provide more details on Ofcom's plan for the project and would appreciate further clarity on next steps. We would suggest it may be helpful to consider, as part of this engagement, a cross industry session alongside colleagues from Ofcom, Ofgem, BEIS and relevant key industry parties - especially DCC and energy suppliers. As part of that session it would be beneficial to discuss project delivery and early planning milestones. Energy UK recognises the impacts of different sectors and sees value, in terms of balancing the needs of all players, of exploring further the timelines for sunsetting 2G/3G. We hope this response is helpful and supports Ofcom in confirming its next steps.

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