EUTC

Response to the UK Ofcom Proposed Plan of Work 2022/23

The European Utilities Telecoms Council (EUTC), representing European electricity and gas generation, transmission and distribution companies (including a number of UK players) welcomes the opportunity to comment on Ofcom's proposed plan of work for 2022/23 and wishes to make some reflections on the workplan which we believe may help Ofcom in formulating its workplan.

Commentary:

1. At the outset in section 1.1, Ofcom declares that "Throughout society, we are increasingly relying on the UK's communications networks for the way we live, work, shop and use public services." It continues in paragraph 1.11 "***Internet we can rely on*** – Access to reliable, affordable internet is now central for everyone, whether at home, at work or in our social lives. …. Reliability does not just mean fast speeds and a good service; it also means resilience against cyber-attacks and the ability to withstand threats from bad actors." As a trade association representing the electricity generation, transmission and distribution sector, we must also point to the increasing dependence of these advanced communications networks on a reliable source of electricity. In contrast to previous generations where the access telecommunications network was power resilient, in today's society, in a wide area power outage, most homes lose all their communications connectivity, and are completely blind to events until power is restored.

Radio connectivity is ideal for monitoring remote power lines and operating switches to isolate faults and enable rapid restoration of power to consumers.

Climate change is resulting in more extreme weather events causing greater damage to utility networks.

2. Paragraph 1.6 refers to the recent COP26 conference in Glasgow and the critical issue of climate change. We welcome Ofcom's recognition that communications services can play a role in reducing carbon emissions as we aim for a more sustainable society, and that fixed and wireless services can be instrumental in the move to environment sustainability. We applaud Ofcom's desire to continue to work with companies to consider how they can contribute towards meeting the UK's net-zero carbon target to which reference is made in later sections.

3. We welcome the recognition in paragraph 2.19 that "Spectrum is used for systems that monitor and control … the utilities we use every day". With the transition from, large, centralized power plants to large numbers of geographically

dispersed and intermittent power sources, the need for monitoring and control is increasing by at least an order of magnitude every decade.

4. The reference in paragraph 2.20 to harmful interference, if anything, understates the challenge of monitoring interference in a digital age. With analogue technology, interference was relatively apparent to the user whereas in the digital domain, sophisticated monitoring and analysis is required to determine if the source of degradation is external interference or internal issues. The role of Ofcom's interference and monitoring capability is highly valued and paramount in maintaining the reliability and efficiency of radio communications.

5. We welcome in paragraph 2.21 the priority to be given to Ofcom's investigation of the changes in spectrum demand in the utilities sector. EUTC is ready to assist if requested to provide data on comparable utility telecommunications in other parts of the world which all face similar challenges and are developing innovative ways to tackle the unique challenges of climate change and reduction in CO2 emissions.

The UK has some of the most attractive wind resources in the world, but most generation is in remote locations creating challenges for transmitting this power to where it is consumed, generating unique requirements for utility telecoms monitoring and control.

The European Utilities Telecom Council (EUTC)

The European Utilities Telecom Council (EUTC) is the leading European Utilities trade association dedicated to informing its members and influencing policies on how telecommunication solutions and associated challenges can support the future smart infrastructures and the related policy objectives through the use of innovative technologies, processes, business insights and professional people.

This is combined with sharing best practices and learning from across the EUTC and the UTC global organization of telecommunication professionals within the field of utilities and other critical infrastructure environments and associated stakeholders.