Your response

Question	Your response
Do you have any comments on our proposals?	Confidential? – N

The Joint Radio Company Ltd (JRC)

JRC Ltd is a wholly owned joint venture between the UK electricity and gas industries specifically created to manage the radio spectrum allocations for these industries used to support operational, safety and emergency communications.

JRC manages blocks of VHF and UHF spectrum for Private Business Radio applications, telemetry & tele-control services and network operations. JRC created and manages a national cellular plan for co-ordinating frequency assignments for a number of large radio networks in the UK.

As critical systems users, the Joint Radio Company (JRC) welcomes the opportunity to respond to this consultation on behalf of the electricity and gas utility operators. JRC highlights that communication networks are dependent on access to resilient and robust electricity supplies. As the smart grid evolves, existing monitoring and control systems are being expanded very significantly. This expansion in the operational communications needs of the energy utilities will require access to additional spectrum. This developing need is being explored within Ofcom's current direct engagement with the Energy Utilities.

JRC Response

JRC is pleased to respond to Ofcom's consultation around the 2022-2023 workplan. We recognise that Ofcom has an ever-increasing role in facilitating and regulating a wide range of communications relevant developments for the overall benefit of UK PLC – particularly the rapidly evolving areas of on line services, media and access to the same. We understand that spectrum management is just one component of Ofcom's large remit. As such we note that the majority of the proposed work items are not directly relevant to JRC and its Members. However, we note that almost every work item included in the 2022-2023 programme is dependent upon a secure, reliable and resilient energy supply. We observe that in a world where almost every aspect of daily life is dependent upon an online service and internet connection of one form or another that the need to ensure a constant and stable energy supply is more important than ever – especially during the transition to an economy that is net zero and dependent on distributed renewable energy (DER) sources. Disruption to energy supplies has always had the potential for massive disruption to society but in the third decade of the 21st century it is difficult to overestimate the potential impact to society of any loss of energy supply, even when compared to the situation at the beginning of this century. Resilience and reliability of the UK's intrinsically coupled energy and telecommunications infrastructure has never been more important.

JRC is encouraged to see the priority given to the review of the spectrum needs of utilities in section 2.21. It is positive that the connection between this piece of work and the governments climate change and environmental policy objectives has been recognised. Following closely on the COP 26 event in Glasgow last autumn, UK Government continues to announce further environmental policies which are amongst the most ambitious in the world (especially those around additional wind power, EV adoption and electrification of domestic heating). It is essential that utilities are provided access to the appropriate tools and inputs to facilitate a digital transition and access to appropriate radio spectrum is key to enabling this transition. JRC looks forward to a positive outcome from this focussed piece of work which we have been involved with for the last five years. It is hoped that the recent developments in Ireland, Germany, Spain and Poland around additional utility spectrum access will be acknowledged and replicated to some degree. The current work item within Ofcom also reflects ongoing discussions within RSPG, ITU, ETSI and national regulators in all ITU regions.

Whilst, we have acknowledged that the work item referenced in section 2.21 is targeted at the requirements of UK Utilities, we are concerned that simultaneously utilities are having access to other spectrum allocations curtailed or removed completely. Specifically, the withdrawal of the 1.4 GHz band from 2024 (to be repurposed for Supplemental Downlink) is resulting in considerable migration works to alternative frequency bands – the costs of these migrations ultimately being borne by energy customers. Similarly, recent announcements regarding changes to the 26 GHz microwave band (to be used for 5G & 6G services), coupled with either LTE or WiFi based solution in the 6GHz range are also likely to necessitate expensive hardware swap outs. Our observation is that the major changes to these three frequency bands seems at odds with the current work activity to review the changing (increasing) requirements for utilities to have access to dedicated radio spectrum to facilitate ‘Smart Grid’ developments.