



EUTC Response to CEPT consultation on ERC Recommendation 70-03 - Draft annex 2

Utility response to consultation

Utilities' major focus is on access to licensed spectrum as only in this way can utility operational networks be guaranteed acceptable performance and freedom from interference.

However, in this instance utilities do make use of the band 870-876 MHz as illustrated in EUTC Spectrum Proposal in several European countries for a number of applications, including metering and monitoring small scale renewal energy generation.

EUTC's concern about the proposed changes to ERC Recommendation 70-03 is how this might affect existing and future systems conforming to the Wi-SUN specification by the imposition of additional restrictions on devices operating in the band 870-874 MHz.

We acknowledge the need to protect military systems operating in adjacent bands, and are supportive of the railway sectors' need for enhanced operational telecommunication connectivity which mirrors utilities' own need for greater spectrum access.

We wish to see legacy systems operating in the band 870-874 MHz continue to be able to be used; and also use the band for future applications to extend utility control into areas which might otherwise be difficult or disproportionately expensive to monitor and control. Ultimately, the cost of deployment of utility control systems has to be borne by energy and water customers. Utilities need to avoid unnecessary costs which would be detrimental to the interests of consumers.

Networked 'Short Range Devices' (SRDs) have already been rolled out under the conditions set out in the previous version of ERC Rec 70-03. In these instances, control by a 'Network Access Point' (NAP) was not necessary below 873MHz. We are concerned that the operation of some technologies might be ruled out by varying interpretations of the meaning of 'under the control of a NAP'.

We would be content to see NAP rules applied above 874 MHz to protect other systems, but request that spectrum in the band 870-874 MHz can continue under the present arrangements to facilitate maximum flexibility in exploiting the characteristics of this important SRD band.

EUTC Spectrum Proposal
<i>Within Europe, multiple small allocations within harmonised bands:</i>
LESS INTENSE APPLICATIONS
<ul style="list-style-type: none">• VHF spectrum (50-200 MHz) for resilient voice comms & distribution automation for rural and remote areas. [2 x 1 MHz]
ANCHOR BAND
<ul style="list-style-type: none">• UHF spectrum (400 MHz bands) for SCADA, automation, smart grids and smart meters. [2 x 3 MHz]
MORE DENSE APPLICATIONS
<ul style="list-style-type: none">• Lightly regulated or licence-exempt shared spectrum for smart meters and mesh networks. (870-876 MHz)• L-band region (1500 MHz) for more data intensive smart grid, security and point-to-multipoint applications. [10 MHz]
FOUNDATION BANDS
<ul style="list-style-type: none">• Public microwave bands (1500 MHz – 58 GHz) for access to utilities' core fibre networks/strategic resilient back-haul.• Public satellite bands to complement terrestrial services for particular applications.



Background

Operational communication capability is increasingly important for utilities driven by the demands of Smart Grid developments. To enable Smart Grid developments, more and more European utilities are pursuing access to spectrum to complement fixed telecommunications networks. Dedicated wireless communication systems enable a range of critical communications within the Grid's operation requirements, improving connectivity to all assets and allowing energy utilities to exert a level of control over their network assets that can be guaranteed and is both robust and resilient. In addition, critical utility operational networks must incorporate cyber-security measures capable of withstanding sustained attacks from hostile nation-states.

Traditionally, electricity networks have been one-way systems to deliver power from large centralised generation sources into a transmission grid at high voltage, and then distributed to customers at low voltage.

The current challenge is to accommodate large numbers of intermittent sources of renewable generation connected into the distribution networks at their extremities where the power infrastructure is at its weakest; whilst at the same time reducing 'customer minutes lost' by increasing the reliability of the network.

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 organisation of telecommunication professionals within the field of utilities and other critical infrastructure environments and associated stakeholders.

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