



EUTC Feedback on Draft standardisation request to the European Telecommunications Standards Institute regarding radio equipment in support of Directive 2014/53/EU of the European Parliament and of the Council in conjunction with Commission Delegated Regulation (EU)2021/XXX

EUTC is grateful for the opportunity to provide feedback on the *Draft standardisation request to the European Telecommunications Standards Institute as regards radio equipment in support of Directive 2014/53/EU of the European Parliament and of the Council in conjunction with Commission Delegated Regulation (EU) 2021/XXX*. EUTC, representing European electricity and gas generation, transmission and distribution companies together with limited water activities is interested in the aspects of this request where they relate to smart meters.

Scope

Smart Meters are within the scope of the Radio Equipment Directive (RED) and considered to be in the scope of the Delegated Regulation. We have some confusion regarding the scope of the RED Delegated Act (DA), where it relates to smart meters.

We understand that the RED applies to all smart meters - electricity, gas, heat and water - if the meter is classified as “radio equipment”. In addition, the RED Delegated Act (DA) for 3(3)(d), 3(3)(e) and 3(3)(f) will apply if the meter is classified as “internet-connected radio equipment”. However, we are unclear how the terminology “internet-connected radio equipment” is intended to apply to smart meters. The technology used to interrogate and control a smart meter will depend on the technology preference of the energy supplier and the possibly the meter’s geographic disposition, and occasionally government regulation.

It would be helpful to clarify the situation regarding scenarios such as:

- Smart Meters connected via Public Mobile Network Operator (MNO) networks.
- Smart Meters connected via Virtual Private Networks within MNO networks.
- Smart Meters connected to private radio networks.
- Smart Meters with a wired connection to a Data Concentrator or Gateway.
- A Smart Meter which routes through another smart meter using a low power radio link (eg a gas meter linked by Zigbee to an electricity meter) and therefore has no control over its onward access routing.

There are also likely future scenarios where a meter uses one communications pathway on initial installation to talk to the meter owner, and is then configured remotely over the air to use a different communications pathway for its operation, as is the case with the forthcoming generation of eSIMs equipped for remote provisioning.

We are also unclear in the RED DA where it refers in paragraph 2.2.1. (iii) of Annex II to smart meters “in the field of energy”. This might lead us to the assumption that this specific requirement of 2.2.1.(iii) only applies to electricity (and possibly gas) meters, but excludes heat, gas and water meters. Is it intended to be so?

Security

We are concerned about section 2.2.1.(iii) where it states: “*smart meters and 5G network equipment ... shall not undermine the high level of security requested at national level*”. We are concerned at the conflation of ‘smart meters’ and ‘5G network equipment’ as these are very different scales of equipment. The number of smart meters will be several orders of magnitude greater than 5G network equipment, and the markets are very different. Smart meters are consumer orientated devices with a target cost in the region of 50 Euros, are continuously powered in the case of electricity meters or battery powered in the case of gas and water. A large homogenous European market will benefit consumers through lower prices, a situation which will be hindered if national level security standards are applied. Furthermore, the complexity of the security requirements impacts the complexity of the processing power required, the energy consumed in executing the operations, the bandwidth of the necessary communications channels and the life of the battery where relevant. We are uncertain whether all these considerations have been taken fully into account in the proposed standardisation request.



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.

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