

July 30, 2025

## EUTC | Position on the Call for Evidence for European grid package

## 1. Statement of Interest

The European Utilities Telecom Council (EUTC) welcomes the opportunity to contribute to the European Commission's consultation on the European Grid Package. As the voice of utilities operating mission-critical telecommunications infrastructure across Europe, EUTC advocates for the development of secure, resilient, and interoperable communications networks that are fundamental to the future of an integrated European electricity grid.

EUTC emphasises the strategic importance of dedicated utility telecommunications networks in ensuring the reliability, security, and digitalization of the electricity system, especially in light of growing decentralization, electrification of end uses, and the integration of renewable energy sources. These often privately owned and operated networks are critical enablers for grid management, data protection, and real-time system coordination.

The Association urges the European Commission, ACER, and Transmission and Distribution System Operators (TSOs and DSOs) to formally recognise the role of utility telecommunications infrastructure in network planning, operational security, and technical interoperability. In particular, EUTC believes the European Grid Package should explicitly acknowledge critical communications networks as an integral component of the European grid architecture and planning processes.

Established to represent the unique communications needs of the utility sector, EUTC remains committed to working closely with its members and EU institutional partners to support a systemic and resilient approach to future energy infrastructure development.

## 2. Main observations

EUTC welcomes the European Commission's initiative to strengthen and modernise Europe's electricity infrastructure through the European Grid Package. As the representative voice of utilities operating mission-critical telecommunications networks, EUTC supports the Package's focus on accelerated permitting, digitalisation, and infrastructure efficiency as essential levers for achieving a cost-effective, resilient, and secure energy transition.

At the same time, EUTC believes that the future electricity grid cannot be planned or operated in isolation. The Commission should adopt a more integrated network approach, recognising the growing interdependence between electricity, hydrogen, heat, and potentially water networks. These coupled systems will be essential to store renewable energy at scale and balance the inherent intermittency of wind and solar generation cost-effectively.



In this context, EUTC highlights the urgent need to ensure that grid-related permitting frameworks, such as those stemming from the General Infrastructure Access rights, are interpreted and applied in a way that enables utility operators to deploy optical fibre and communications infrastructure on equal footing with traditional telecom operators. This is critical, given that public communications networks alone are not capable of meeting the stringent requirements for security, latency, and resilience demanded by energy system operations. Relying exclusively on public providers to fill this gap would not only be economically inefficient but would also create long-term vulnerabilities.

Furthermore, EUTC calls attention to the importance of equitable access to radio spectrum for the deployment of private utility networks. The current allocation regimes, largely dominated by either the public sector or commercial telecom actors, do not sufficiently accommodate the needs of critical infrastructure operators. To enable utilities to build and maintain cost-effective, secure private networks, suitable spectrum bands must be made available under regulatory conditions that reflect their public interest mission and avoid undue financial burdens on energy consumers.

This challenge is particularly visible in multi-energy utility environments, where gas and electricity networks coexist but receive uneven attention in digitalisation and communications infrastructure policy. EUTC members operating across energy vectors report significant regulatory and investment asymmetries. These need to be addressed to ensure coherent planning and resilience across all critical energy networks.

Finally, EUTC stresses that the effective and secure digitalisation of the European grid, especially in decentralised architectures, can only be achieved if utility communications infrastructure is treated as a core enabler of the energy transition. This includes clear regulatory recognition of telecom infrastructure in grid planning, streamlined administrative procedures, and targeted support for innovation and deployment.

EUTC remains committed to supporting the Commission's efforts in this area and stands ready to contribute its technical and operational expertise to ensure that digital communications are fully embedded into the future architecture of Europe's electricity grid.

This digital architecture must also be conceived as cross-sectoral, capable of supporting secure, interoperable communications not only for electricity but also for gas, heat, hydrogen, and water, where relevant, to deliver a truly integrated energy system.