Response to the Public Consultation on Draft RSPG Work Programme for 2026 and beyond

The European Utilities Telecom Council (EUTC) represents European electricity and gas generation, transmission and distribution companies and welcomes the opportunity to comment on the draft RSPG Work Programme for 2026 and beyond.

EUTC is proud that its members are an integral component of the battle to decarbonize European Society in a cost-effective, secure and sustainable manner. Electricity networks play a central role in delivering these goals. This is not just a European goal, but a global ambition coordinated through the Conference of the Parties to the United Nations (UN) Framework Convention on Climate Change (COP) in which Europe plays a leading role.

COP30 (the 30th meeting of the Conference of the Parties) was held in Belém, Brazil from 10-21 November 2025. The Conference was preceded by a two-day World Leaders Climate Action Summit bringing together heads of state and government, ministers, and leaders of international organizations to discuss pressing climate change challenges and commitments. Convened by President Luiz Inácio Lula da Silva, the meeting represented a key milestone in the process of mobilization and international dialogue on the climate agenda. Both the Summit and COP30 provided a platform for world leaders to raise ambition, and translate climate pledges into concrete, real-economy outcomes.

Addressing world leaders at the opening of the Leaders' Summit in Belém, UN Secretary-General António Guterres made the case that a clean energy revolution has taken hold. "Solar and wind are now the cheapest sources of power – and the fastest growing sources of electricity in history," he said. "Last year, almost all new power capacity came from renewables. The clean-energy economy is creating jobs and driving development. It is reshaping geopolitics – delivering energy security and price stability. And it is connecting millions to clean and affordable energy for the first time". He called on world leaders to move faster – and move together, adding that COP30 must ignite a decade of acceleration and delivery.

EUTC members are closely engaged with Administrations that recognize the essential need for utilities to have direct access to spectrum in order to accelerate the delivery of these ambitious climate goals by means of an energy transition from dependence on fossil fuels to zero emission technology, especially renewable energy. European utilities are totally committed to facilitating the move towards renewable energy and demand management in order to reduce the harmful emissions of greenhouse gasses, together with the greater electrification of society as demonstrated at the recent COP30 meeting in Brazil.

Peer review and Member States cooperation

EUTC notes that this process is being used to address challenges regarding PMSE spectrum and usage. ITU-R WP5A is issuing a Liaison Statement from ITU to Regional Organisations, CEPT in the case of Europe, to provide information on current and future frequency bands within the existing mobile service allocations to support Utilities Radiocommunications. Taking into account RSPG's remit to consider economic, social and environmental sustainability and efforts to combat climate change; RSPG ought to adopt the same process for Utility Radiocommunications as being applied to PMSE.

WRC-27 (World Radio Conference 2027)

EUTC draws RSPG's attention to ITU Report M2533-0 on Utility Radiocommunications[1]. Utilities are now focusing on developing a Draft ITU Recommendation on preferred spectrum bands for Utility Radiocommunications to assist administrations looking to harmonise spectrum for these Mission Critical Applications.

Bearing in mind the need for urgent action in response to UN and EU climate initiatives, it is imperative that the needs of utility radiocommunications are recognized at WRC27. If the timescales of the work currently under way in WP5A do not deliver the essential preparatory work in time for WRC27, the subject must be added to the Agenda for WRC31.

"Good offices" to assist in bilateral negotiations between Member States

At present, to EUTC's knowledge, RSPG "Good Offices" have not been required in any areas relating to utilities' use of spectrum. However, as utilities adopt private wireless networks for broadband radio solutions in dedicated spectrum, cross-border co-operation is required, especially in the case of broadband to narrowband coordination; or utility radio service to non- utility radio service. In these cases, RSPG's "Good Offices" may be of value.

6G Spectrum Roadmap

EUTC notes the increasing number of private networks deploying 3GPP technologies. This commenced principally in 4G/LTE and has continued in 5G. We anticipate this trend to continue in 6G as vertical sectors become a major source of investment capital for 6G.

Utility interest in 6G can be summarized as prioritizing features of interest to the Mission Critical Communications sector, including:

- Resilience.
- Security.
- Seamless roaming between terrestrial and NTN networks.
- Roaming between public and private 3GPP networks.
- Higher Power User Devices.
- Coordination between telecoms and power networks to enhance the mutual resilience and availability of both networks.
- Sidelink, Direct-to-Device, mesh, gateway and relay modes of operation including access to suitable spectrum to facilitate such operation.

[1] Utility radiocommunications operating in the land-mobile service (itu.int)

Utilities' primary interests focus on the lower frequency bands being addressed by 5G, 6G, and future wireless broadband networks. This interest is now extending into the satellite segment with the concept of direct-to-device type technologies being deployed in private networks using 3GPP harmonised frequencies below 1 GHz.

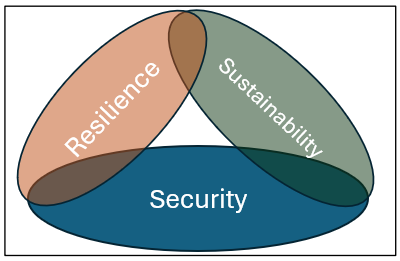
Strategic Spectrum Matters

EUTC's concerns in terms of strategic spectrum matters include three major policy areas where spectrum policy must support other EU objectives, specifically:

- Energy Transition and Climate Change: as outlined in previous consultations, the energy transition envisages major changes in the sources of energy supply, especially in the volume of intermittent and unpredictable generation and the whole architecture of the energy network. At the same time, electrification of heat and transport require massive growth in the amount of energy which must be supplied. Climate change also places greater strains on the energy networks due to severe weather events affecting both energy supply and demand, together with a greater potential for physical damage to energy network infrastructure.
- Resilience: as society becomes more interconnected and reliant on a secure supply of electricity, energy network resilience is vital, but energy network operations are themselves critically dependent on reliable operational telecommunications.
- Cyber Security: although physical security is an important element in securing energy networks, the increasingly connected nature of these networks by means of advanced telecommunications creates opportunity for hostile forces to disrupt energy supplies on a potentially a massive scale and undermining energy markets.

Guidance for alternative use of the sub-700 MHz band

EUTC acknowledges the complexity of addressing the challenges regarding use of the band 470-694 MHz after 2030 as demand for digital terrestrial television declines at different rates in different administrations. The priority for RSPG must be to assess potential future demands for spectrum in this band which will differ from past requirements. Safeguarding PMSE access to suitable and sufficient spectrum is an obvious issue, as are future demands from the IMT community for additional spectrum. However, societal pressures focusing on security, sustainability and resilience are placing a spotlight on the increasing needs of the Mission Critical Sectors – mainly PPDR and utilities – for access to additional sub-1 GHz spectrum to meet their operational needs.



On the basis that spectrum in the band 470-694 MHz is likely to become available for IMT type services from 2035, it would be wise to reserve at least 2 x 10 MHz of this spectrum for mission critical applications.

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.

Typical utility distribution control room

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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