

March 12, 2026

EUTC | Response to the [Digital Package and Omnibus Simplification Call](#)

1. Statement of interest

The European Utilities Telecom Council (EUTC) welcomes the European Commission's Digital Omnibus Simplification package as a pivotal initiative to assess and streamline the EU digital acquis. As Europe advances towards a net-zero carbon future, underpinned by the deployment of integrated and intelligent energy systems, a coherent and future-proof regulatory framework becomes indispensable. In this context, EUTC supports efforts to foster a more harmonised and innovation-friendly telecommunications environment, capable of reducing unnecessary administrative burdens and enabling efficient investment in digital infrastructure.

Beyond its longstanding technical expertise, EUTC stands ready to contribute to the broader strategic reflection underpinning the Simplification exercise. Representing the connectivity interests of Europe's energy utilities, the organisation brings a systemic understanding of how telecommunications, digital technologies and critical infrastructure intersect within complex technological ecosystems. To that end, the association stands ready to participate in any EU-level assessment or analytical process linked to the Digital Omnibus, offering practical insights into connectivity-related challenges and the regulatory conditions required to support resilient, secure and sustainable energy networks.

Furthermore, critical infrastructure providers are represented by EUTC, with their mission-critical telecommunications serving as the operational backbone of the modern grid. As energy and digital systems become inextricably linked, our members are proactively shaping future standards for resilient operational technology networks to ensure seamless interoperability. By leveraging deep technical expertise, a framework prioritising collective resilience is supported across the continent. Ultimately, Europe's power systems are safeguarded through a secure and sustainable digital transformation, allowing the demands of a rapidly evolving energy landscape to be met with confidence.

2. Main observations

Realising an integral smart grid requires the deployment of a dense network of connected devices to ensure strategic efficiency. Stakeholders increasingly recognise digital infrastructures as strategically critical assets, mirroring the role of physical energy infrastructure in ensuring long-term security. Since these systems are inextricably linked, the energy sector must prioritise digital resilience to maintain the stability of the entire ecosystem. Conversely, many small and mid-cap

utilities face a significant compliance cliff edge. While smaller entities currently enjoy regulatory relief, scaling operations often triggers the full weight of the digital acquis for these mid-caps, which diverts essential capital away from grid modernisation.

Institutional fragmentation is observed as data rules remain dispersed across the Data Act, DGA, and Open Data Directive. This overlap creates legal ambiguity, thereby hindering operational efficiency and innovation. Considering the long-lifecycle technical realities of the sector, energy infrastructure is typically operated on fifteen-to-thirty-year cycles. The constraints of legacy systems are therefore often overlooked by horizontal regulations, potentially compromising the continuity of essential services if these specific technical timelines are ignored. Thus, by addressing these misalignments, the European Commission can ensure that the digital transformation of the power sector remains both inclusive and technically feasible.

3. Recommendations to the European Commission

Establishing operational readiness serves as the definitive priority for the European energy sector, requiring the Commission to transition decisively beyond pilot phases by launching a Common European Energy Data Space for electricity. This foundational infrastructure, engineered for near real-time capability and sustained by robust funding, acts as the primary catalyst for an integrated European grid. Consequently, energy operators gain the ability to share and access data with unparalleled efficiency while upholding the highest standards of operational security.

To govern these digital spaces effectively, EUTC advocates for a dual governance model designed to balance legal oversight with technical expertise. This framework pairs an independent EU-level entity, which guarantees legal certainty, with a multi-stakeholder council comprising TSOs and DSOs to ensure operational relevance. Accordingly, this structure facilitates sector-wide compliance and empowers operators to navigate an evolving technological landscape with agility.

Strategic streamlining of the data framework remains equally vital to support grid resilience; therefore, the Association asserts that data sharing under the Data Act should remain voluntary by default to foster industrial innovation while shielding sensitive parameters, such as grid controller settings, from exposure. The Commission must also provide explicit guidance confirming that the use of smart meter data for grid stability and billing represents an essential service prerequisite. Hence, by decoupling these functions from individual user consent, the industry protects critical operations from disruption and maintains public trust.

In tandem with these protections, a transparent regulatory pathway is required for cases where data access is indispensable for service contracts or infrastructure protection. Thus, by reinforcing operational continuity, the EU provides the legal certainty necessary for operators to commit to the long-term investments required for the energy transition.

Beyond data-related considerations, the resilience of telecommunications networks and digital services should remain a central element of the Simplification exercise. This includes a forward-looking assessment of connectivity needs, notably in relation to the availability of spectrum resources, including sub-1 GHz bands, that are critical to supporting robust and secure

communications infrastructures. Ensuring that the regulatory framework adequately reflects these requirements is key to safeguarding the reliability of essential services.

In this context, EUTC advocates for a holistic perspective that recognises the interdependence between public and private connectivity solutions and the need for coherent end-to-end ecosystems. Policy choices, including those concerning cloud portability requirements, should be carefully calibrated, with a primary focus on Infrastructure-as-a-Service (IaaS), to avoid inadvertently disrupting specialised digital solutions that contribute to the safety and stability of critical infrastructures.

At EU level, greater strategic reflection, guidance and coordination are essential to ensure that regulatory simplification strengthens, rather than fragments, Europe's digital and connectivity landscape. EUTC stands ready to contribute its cross-sectoral expertise to support this broader assessment of network and service resilience, helping to provide a balanced and future-proof policy approach.

The pragmatic implementation of the AI Act ensures that emerging technologies augment human expertise rather than replace it. By codifying AI as a supplementary tool, the sector preserves vital human oversight in safety-critical processes. The Association further recommends deferring obligations for high-risk AI until twelve months after the publication of harmonised standards. This phased approach provides the industry with the legal clarity necessary to support sustained infrastructure investment and maintain a secure and resilient energy system.

Conclusion

In conclusion, the Digital Omnibus represents a landmark opportunity for the European Commission to transform regulatory complexity into a catalyst for industrial leadership. For the utility sector, this initiative must transcend mere administrative relief, establishing a framework as resilient and forward-looking as the grids it governs. By addressing compliance discontinuities for small and mid-cap entities and adopting a pragmatic, sector-specific approach, the Commission can empower Europe's energy and telecommunications providers to deliver a sustainable, secure, and technologically sovereign Union. EUTC remains unequivocally committed to providing the technical expertise necessary to ensure this digital framework underpins a net-zero future for all European citizens.