DIGITALEUROPE's views on the Digitalisation of Energy Action Plan

In terms of focus areas in the Digitalisation of Energy Action Plan, we would like to stress the following:

Developing a European data-sharing infrastructure to create a competitive market for energy services that value demand-side flexibility and support planning and monitoring of energy infrastructure.

▸▸ Our recommendation is to focus on semantics, standardisation, and incentives to remove barriers for innovation and market initiatives enabling digitalisation and marketplaces.

Empowering citizens by providing them with tools for participation in the energy markets, tailored data driven services and implementing reskilling and upskilling pathways.

▸▸ It is critical with regulatory requirements on metering and the DSOs need to enable the metering data in a unified way to a market (potentially as opt-in from the consumer). There should also be market incentives for consumers to engage, e.g. liberalized energy prices, and then the market should supply the needed solutions. It is good if the markets across Europe are unified, i.e. similar products and logic (e.g. FCR-D, FCR-N, Day-a-head spot etc.) to easy for multinational technology innovations and aggregators.

Enhancing the uptake of digital technologies in the energy sector by mobilising research, fostering innovation and making use of complementary instruments to support the scaling up of piloted solutions.

▸▸ Strongly recommend to establish a cross-sector eco-system for collaboration, e.g. telecom and energy utility, based on a digital infrastructure two-way. Digital energy service via telecom communication interworking with assets in ICT networks for stability in energy grid. Prediction and quality of service communication to aim for high network availability for enterprises. Also, unify the semantics cross players and markets to get to relevant aggregated volumes for aggregators to work on. Lastly, security and privacy aspects are important to address.

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Enhancing the cybersecurity of the energy sector facing real-time requirements, cascading effects and the mix of legacy technologies with smart/state of the art technology.

▸▸ The role of research and innovation are crucial, specifically focusing on a horizontal approach rather than a specific sector. Could possibly be strengthened by saying "unconstrained innovation" and "horizontal approach using leverage from market driven volumes and innovation from entire ICT sector/investments", i.e. do not go into the trap of regulators engineering cybersecurity in detail but rather use the tools like the NIS directive to enforce appropriate cybersecurity.

▸▸ Key capabilities to be address be researched include ensuring the trustworthiness and integrity of data. This include the identities of devices and securing data at the source, data transport needs to be secured, and needs to be possible to share/trade in an automated "marketplace" supporting a decentralized trust model.

▸▸ More research is needed. Here it would be interested if we could focus on what assets that we have in 3GPP world, e.g. SIM technologies, positioning services, etc.

Supporting the development and uptake of climate neutral solutions for the Information and Communication Technologies sector as complementing in the European Digital Strategy focusing on measures that promote cooperation between the energy sector and the digital sector.

▸▸ Inputs from industry associations and Alliance groups are important to be taken into consideration.

DIGITALEUROPE welcomes with caution the intention under the DoEAP to include a potential 'area' on 'Developing a European data-sharing infrastructure', in particular the "development of an interoperability framework".

A framework for data exchange and interoperability is essential as digitalisation rapidly proliferates in the context of the energy sector. However, DIGITALEUROPE is concerned that the 'area' must be fully placed in the context of the multiple initiatives ongoing within the Commission to support the digitalisation of buildings as a significant end-use sector.

In particular, DIGITALEUROPE would like to highlight the work being undertaken at the product/Technical Building System (TBS) level under the framework of Ecodesign (ErP):

▸▸ Interoperability is a central issue for the preparatory study on measures for Building Automation & Control Systems (BACS) (ENER LOT 38), at both the building management level and for BACS incorporated in TBS.

▶▶ In addition, interoperability is a key feature of the work on Smart Appliances (ENER LOT 33) on which the Commission's Joint Research Centre (JRC) is developing a Voluntary Code of Conduct. Under ENER LOT 33 the JRC is taking steps to ensure "adherence of industry to open standards, and promotion of SAREF[4ENER] as a general ontology underpinning product interoperability".

More widely, under the proposal to revise the Energy Performance of Buildings Directive (EPBD) the Commission is to be empowerment by the new Article 14 on data exchange, to "adopt implementing acts detailing interoperability requirements, and non-discriminatory and transparent procedures for access to data".

Against this unclear backdrop it is essential that the Commission avoids the risk of double regulation. It would be prudent for the Commission to nurture and see to fruition, product/TBS level developments under ENER LOT 38 and ENER LOT 33, that are well advanced before working on the "interoperability framework" at the level of the energy sector.

Amongst the areas that are important to further support the digitalisation of the energy system, we want to mention the following:

▶▶ Eliminate legal uncertainties in the use of data and cloud solutions e.g., for energy efficiency in buildings
▶▶ Advance open data
▶▶ Expand telecommunications, broadband, and infrastructure (black start capable grids)
▶▶ Research and promote the use of artificial intelligence
▶▶ Get clarity on the upcoming regulation on AI and its impact on the energy system
▶▶ Strengthen cyber security and resilience of energy systems
▶▶ Stimulate investments in operating costs (CAPEX)

About DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies. DIGITALEUROPE ensures industry participation in the development and implementation of EU policies.

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