

## Consultation response form

Please complete this form in full and return to [annualplan2020@ofcom.org.uk](mailto:annualplan2020@ofcom.org.uk) or:

Plan of Work Team, Strategy and Policy Team  
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<b>Consultation title</b>	Ofcom's proposed Plan of Work 2020/21
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## Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	Nothing
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	None
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	N/A

## Your response

Question	Your response
<b>Do you have any comments on our proposals?</b>	<p>Confidential – N</p> <p><b>4.3 Maintaining effective communications networks</b></p> <p>Ofcom’s supporting Open Reach’s PSTN Switch-Off will result in the removal of the existing UK-wide Resilient, Strong and Secure fixed networks on which the Energy Utilities depend. Noting that there is no readily available resilient alternative this poses significant challenges to the integrity of the Energy Supply system.</p> <p>The power utilities will be forced to replace their existing solutions including equipment at significant cost, disruption and risk to the Energy Supply system. The impacts of such a profound change do not appear to have been considered at a Departmental Government level and as such an appropriate risk assessment undertaken to inform the decision to allow BT to switch-off the system was not undertaken.</p> <p>Noting that the Energy Supply sector is also subject to profound change with a growing need for enhanced operational communications capability there is the potential to align the switch-off of the PSTN system with the provision of spectrum access for the Energy Utilities to facilitate the anticipated future Smart Grid Developments.</p> <p><b>4.14 Engaging with other bodies</b></p> <p>There is an increasing need for Ofcom to supply spectrum for the evolving private Smart Grid control networks to meet published timeframes and government milestones.</p> <p>Ofcom working with other Regulators, e.g. Ofgem, DCMS, and BEIS, will ensure alignment across Government Policy and best facilitate appropriate market interventions, in particular to facilitate the spectrum needs of the Energy Utilities to deliver against net Zero targets.</p>

**4.18 Ofcom will examine how [it] can help the Government to achieve its net-zero emission target for 2050**

JRC notes that, like Ofcom, the RSPG<sup>1</sup> will also be debating '**Identify climate change-related aspects within spectrum management**'.

JRC highlights that the Government's drive for net-zero emissions includes the roll-out of distributed electricity generation sites, e.g. wind farms and solar farms. Like other parts of the electricity grid, windfarms and solar farms require real-time remote monitoring and control. Apart from day-to-day management, one reason is to isolate them quickly if they unbalance the electricity grid. Another is to manage their reconnection to the electricity grid after an outage. With the dramatic expansion in active assets across the energy networks and the increasing importance of real-time data to manage the supply and demand dynamic which is becoming increasingly complex through the adoption of Electric Vehicles - there is an increasing need for spectrum access for the Energy Utilities to facilitate Government Policy outcomes, i.e. net Zero targets. To this end we are very supportive of the detailed analysis being undertaken by Ofcom to inform their policy with the expectation that in due course sufficient spectrum will be made available to the sector.

**Authorising spectrum use:**

JRC acknowledges the important roles of the Spectrum Licensing Teams and Field Teams.

JRC thanks the Teams for their hard work.

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Link to RSPG Spectrum Policy Group [https://rspg-spectrum.eu/wp-content/uploads/2020/02/RSPG20-005final-work\\_programme\\_2020\\_and\\_beyond.pdf](https://rspg-spectrum.eu/wp-content/uploads/2020/02/RSPG20-005final-work_programme_2020_and_beyond.pdf)

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<sup>1</sup> [https://rspg-spectrum.eu/wp-content/uploads/2020/02/RSPG20-005final-work\\_programme\\_2020\\_and\\_beyond.pdf](https://rspg-spectrum.eu/wp-content/uploads/2020/02/RSPG20-005final-work_programme_2020_and_beyond.pdf)