



ESMIG Position Paper on the draft Standardisation Request to the RED Delegated Act

ESMIG position

ESMIG is the European association representing the smart energy solution providers. Our members provide products, information technology and services for multi-commodity metering, display and management of energy consumption and production at consumer premises.

We would like to react on:

Draft standardisation request to the European Telecommunications Standards Institute as regards radio equipment in support of Directive 2014/53/EU of the European Parliament and of the Council in conjunction with Commission Delegated Regulation (EU) 2021/XXX.

We have reviewed this draft Standardisation Request (SR) with interest and since:

- smart meters are one of the essential products in the scope of our association and
- smart meters are in the scope of the Radio Equipment Directive and considered to be in the scope of the Delegated Regulation,

we would like to give you our position regarding the draft SR.

First, we would like to raise our concern regarding the confusion about the scope of the RED Delegated Act (DA), where it concerns smart meters.

We understand that the RED applies to a wide range of smart meters (i.e., electricity, gas, heat, and water) if the meter is classified as “*radio equipment*”. While the RED Delegated Act (DA) for 3(3)(d), 3(3)(e) and 3(3)(f) will apply if the meter is classified as “*internet-connected radio equipment*”. However, in general smart meters use virtual private networks (VPN’s) that have security mechanisms and standards already build in so would that imply they would be excluded?

Anyway, the RED DA refers in paragraph 2.2.1. (iii) of Annex II to smart meters “*in the field of energy*”, leading to the assumption that this specific requirement of 2.2.1.(iii) in the SR covers electricity meters only and do not include heat, gas, or water meters.

There exist architectures where smart meters have a wired connection with a gateway or data concentrator. The gateway or data concentrator is then connected to a Wide Area radio Network. Would these meters be excluded?

We suggest that in the SR it is made clear which smart meters are in- and which are out of scope among the following:

- Smart meters connected to public cellular networks
- Smart meters connected to (virtual) private radio networks.
- Smart gas, water, heat meters.
- Smart meters with a wired connection to a Data Concentrator or Gateway.

Secondly, we have concerns about the section in 2.2.1.(iii). This reads: “... *shall not undermine the high level of security requested at national level*”. There is a danger of multi-interpretation of the term “*shall not undermine*”. We (and our contacts at DG-Ener) are interpreting this term as setting a baseline level of security requirements while EU member states can extend this baseline with additional or stronger requirements in order to reach a higher level. This baseline should be agreed among the Member States.

The term “*shall not undermine*” should not be interpreted as an obligation for all member states to follow the member state that has defined the highest level of security in the EU. We suggest that the SR makes clear the term “*shall not undermine*” should be interpreted as setting a baseline level of security requirements.

Finally, we propose for smart meters that are in scope of the Delegated Act, to either have them covered by the common standards for all radio equipment or, in case these common standards are not fit for smart meters, develop a specific standard for smart meters based on the existing ones such as the Smart Meter Protection Profile (developed by the CEN/CENELEC/ESTI Smart Meters Coordination Group) or standards from the relevant Technical Committees such as EN 13757.

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About ESMIG

ESMIG is the European voice of the providers of smart energy solutions. Our members provide products, information technology and services for multi-commodity metering, display and management of energy consumption and production at consumer premises.

Our activities are focused on systems for smart metering, consumer energy management and safe and secure data transfer.

We work closely with EU policy makers and other EU associations to make Europe’s energy and water systems cleaner, reliable, more efficient and the European consumer informed, empowered and engaged.