Position Paper

Reaction to the Code of Conduct on energy management related to interoperability of Energy Smart Appliances (V.1.0)

The transition to sustainable energy sources introduces distributed intermittent energy that requires more flexibility in demand. It is anticipated that consumers will play an active role with self-generation and will pro-actively manage their demand according to their needs and available resources. Energy Management applications will be used to control consumption, generation, and storage. These applications will take input from various sources such as Smart Meters and energy market players to control the in-home energy flows. To that end, the data needed for this home energy management needs to flow seamlessly through an IT infrastructure that connects Smart Meters, Consumer Energy Management Systems and Smart Appliances. This IT infrastructure is covered by at least three different industries that all have developed and are developing technology and standards, i.e., the Utility industry, the Telecom industry, and the Home/Building appliances industries.

We believe that the work on interoperability requires the involvement of all relevant stakeholders in the concerning area and should take into account the standardization work done by the ESO's and where applicable by the ISO's. For the standardization work in the field of Smart Grids the EU Commission issued the M490 mandate for CEN, CENELEC and ETSI to coordinate the standardization activities. Based on that mandate the Coordination Group on Smart Grids was established, and it is still active to monitor and report on the standardization work, identify gaps, and overlaps and advise Technical Committees in the field of Smart Grids.

Furthermore, Expert Group 1 of the Smart Grid Task Force is dealing with the definition of processes and data models for energy data access. If this has not been the case, the work of this group should also be taken into account.

With interest we have taken note of the **Code of Conduct on energy management related to interoperability of Energy Smart Appliances (V.1.0**). Although we appreciate that attempt to reach interoperability for Energy Smart Appliances, we cannot agree with the current version of this Code:

- In the first place we believe that such a Code must have a wider scope. The first steps for managing home/building energy consumption and generation should focus on the devices that consume or produce most energy, such as heat pumps, charging stations, HVAC and solar panels. A limitation to HVAC and smart appliances will lead to a sub-optimal solution and parallel, not aligned activities for the other appliances.

- Secondly the Code neglects the standardization work already taking place in the field of Home/Building energy management. We want to mention specifically here the work of CENELEC and IEC TC13 (in combination with the DLMS-UA) on standards for electricity metering and management and the work of CENELEC TC205 on standards for Home and Building Electronic Systems (a standard is mentioned but not how it integrates).

It is our belief that a wider stakeholder involvement is important for a successful approach of interoperability in Smart Grids. Furthermore, we believe that the solution for interoperability must be found by:

- getting a better and complete insight into the existing standardization work and the nature of existing (draft) standards.

- investigate which combinations of standards can be made to create complete communication protocol stacks.

- Harmonization or alignment of standards coming from different industries and as such create wholistic solutions.

We would like to mention the CEN/CENELEC/ETSI Coordination Group on Smart Grids again that can play an important role in this approach. It is however also important to reach a broad involvement of industries that are involved in Home / Building energy management.

The signatories of this document are happy to support the work on the approach as suggested in this paper and are open for further discussions on this matter.

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.

About ECOS

ECOS is an international NGO with a network of members and experts advocating for environmentally friendly technical standards, policies and laws. We ensure the environmental voice is heard when they are developed and drive change by providing expertise to policymakers and industry players, leading to the implementation of strong environmental principles.

About DLMS User Association

DLMS User Association is a non-profit organization and a leading voice internationally in interoperable and secure data exchange to support strategic energy and water management. Recognized by major international standardization bodies, DLMS UA is focused on developing and promoting efficient and effective interoperable and secure data exchange standards. We provide a foundation to drive innovation and progress within the energy and water industry aiming to introduce standardization earlier in the development process to accelerate solution adoption and market growth, which, in turn, can lead to further innovations.