



An Coimisiún um  
**Rialáil Cumarsáide**  
Commission for  
**Communications Regulation**

# Telemetry Systems

## Non-Confidential Submission to Consultation 23/118

### Submission to Consultation

**Reference:** ComReg 24/25s

**Version:** Final

**Date:** 03/04/2024

## Submissions Received from Respondents

Document No:	24/25s
Date:	30/01/2024

Consultation:	23/118
Response to Consultation:	24/25

# Content

Section	Page
1 ESB Networks .....	4

# 1 ESB Networks

A decorative graphic consisting of two overlapping, wavy, ribbon-like shapes. The top ribbon is dark blue and the bottom ribbon is a lighter blue with a yellow-to-green gradient at its ends.

## PROPOSED NEW LICENSING FRAMEWORK IN THE VHF AND UHF FREQUENCY BANDS 23/118

Networks Telecoms, ESB Networks Response to ComReg

30/01/2024



## 1. Introduction

ESB Networks welcomes the opportunity to respond to the Commission for Communications Regulation (ComReg) consultation, document reference 23/118, on a proposed new licensing framework in the VHF and UHF frequency bands. Communications systems are critical to the operation of the electricity system, and this will grow in the coming years as more sectors of Ireland's economy decarbonises through the use of renewable electricity and the electrification of heat and transport. As set out in the Irish Government's Climate Action Plan, distributed electricity generation from technologies such as solar and wind will grow significantly in the coming years. Communications systems will be critical to the facilitation of these distributed electricity generation sources on our electricity system. ESB Networks fully supports ComReg's proposed decision and would welcome further engagement in relation to communication requirements of the electricity system into the future.

### 1.1 Role of ESB Networks

As Distribution System Operator (DSO), Distribution Asset Owner (DAO) and Transmission Asset Owner (TAO), ESB Networks works to meet the needs of all Irish electricity customers, providing universal access to the electricity system, and delivering and managing the performance of a system of almost 157,000 km of overhead networks; 26,000 km of underground cables; 800 high voltage substations; significant amounts of connected generation, including ~6 GW of renewable generation connected to the Distribution and Transmission systems; 2.4 million demand customers; and now several thousand "active customers" – including but not limited to domestic premises with microgeneration (a rapidly increasing number), demand side management, houses with battery storage, etc.

ESB Networks is committed to enabling Ireland's renewable energy and decarbonisation targets. In this role, ESB Networks is working to actively support all Irish homes, communities and businesses in their choices and activities at this time of fundamental change in the energy sector. This includes facilitating energy communities and active consumers to participate in the energy market, who will be a critical part of the future energy system. We are doing this by developing systems, products, and platforms to enable this, while maintaining the security and quality of supply that our customers and system need.



## 2. ESB Networks Response to Consultation

In ComReg's conclusions to this consultation and the Draft Decision Instrument included, ComReg is proposing to replicate the existing Telemetry licensing scheme that ComReg initiated in 2014. ESB Networks strongly supports this position.

The current scheme has been consolidated since 2014 with the 2021 Memorandum of Understanding on the frequency coordination of Scanning Telemetry Networks between Ireland and United Kingdom signed by ComReg and the Office of Communications in the UK (Ofcom). The experience of ComReg and the various licence holders, including ESB Networks, who have held and continue to hold licences under this scheme has demonstrated the value of the current Telemetry licence scheme. The scheme has supported the delivery of important telecommunication services as described by ComReg in paragraph 30 and in other statements in the consultation document.

ESB Networks has a requirement to maintain, and in the near term, to continue to expand the current services provided using the national licences we hold. These licences expire in July of this year. It is imperative that the existing critical services ESB Networks operates using these National Telemetry Licences are maintained without interruption. These services are essential for the operation of both the electricity transmission and distribution networks in Ireland. This is particularly important given the continued growth in electricity use and the requirement to enable the connection of new distributed electricity generation on our networks.

The services provided using this telemetry spectrum are planned to be migrated over time to the 400MHz spectrum for which ESB Networks has acquired a licence (400 MHz Band Spectrum, Part A "for Smart Grids"), however this migration will take a number of years. ESB Networks wishes to highlight that due to the increasing functionality required for communications needs on the electricity system, in addition to growth in electricity consumption the requirements for spectrum are likely to increase into the future. The limits of ESB Networks' current spectrum allocation in the 400MHz band will constrain the growth needed to fully implement Smart Grid communications in the future. ESB Networks would welcome engagement with ComReg on this subject.

ESB Networks supports ComReg's proposal in paragraph 62 that in the new regime, licences will be granted for a period up to 10 years to 2034.

To conclude, ESB Networks strongly supports ComReg's draft decision and the Draft Decision Instrument in this consultation and would welcome further engagement with ComReg on future communication requirements of the electricity system.