To whom it may concern,
Please find below the comments from Ericsson to the Public Consultation on Smart Metering (Ref: E10-RMF-23-03).
Regards,
Bo Ribbing
on behalf of **Ericsson**

----- Start of submission --------

Extra comment on topic we believe should be addressed by ERGEG in cooperation with telecom regulators:
The use of a (general-purpose) multi-service Telecommunication infrastructure for Smart Metering is a key enabling element in Smart Metering solutions since such an infrastructure is not limited to smart meter reading & management but also enables other consumer services based on / related to Smart Metering (e.g. consumer feedback loop, home energy management).
Furthermore, Smart City concepts, of which Smart Electricity Management is typically one key component, are calling for cost efficiency by utilizing a common infrastructure for the communications needs of a number of services ranging from Smart Metering to eHealth. Therefore we believe that a multi-service telecommunication infrastructure for Smart Metering should also from a regulatory perspective be included in the concept of Smart Metering.
The liberalization of the energy markets shall among other aspects facilitate innovation in the area of consumer services. Besides energy-related services we expect to see broader home surveillance or home automation services as well as bundling of telecommunication and energy services. As for Smart City concepts, open broadband access networks are currently discussed as a solution to facilitate all sorts of consumer services including Smart Metering and energy-related services.
From a regulatory perspective clarification is needed regarding the potential usage or restiction on the use of Smart Metering infrastructures for consumer services beyond meter data collection, meter device management and supply activation/de-activation, and under which conditions open access networks can also be used for Smart Metering communication.
Comments on Recommendation 4:
We believe that a "near-realtime" consumer feedback loop will be a necessary feature in order be able to influence consumption behavior and trigger behavioral changes. Used to dealing with modern media delivery, most consumers are today used to getting near-instant feedback on their actions. In particular the presentation of results/consequences of (remote) switching of electrical appliances by suitable appliactions can help impact consumption behavior. This would require near real-time feed-back reading intervals substantially below half an hour, a feature commonplace in today’s communications applications.

------ End of submission ----------