

## Your response

Question	Your response
Do you have any comments on our proposals?	Confidential? – N

### **The Joint Radio Company Ltd (JRC)**

JRC Ltd is a wholly owned joint venture between the UK electricity and gas industries specifically created to manage the radio spectrum allocations for these industries used to support operational, safety and emergency communications.

JRC manages blocks of VHF and UHF spectrum for Private Business Radio applications, telemetry & tele-control services and network operations. JRC created and manages a national cellular plan for co-ordinating frequency assignments for several large radio networks in the UK.

As critical systems users, the Joint Radio Company (JRC) welcome the opportunity to respond to this consultation on behalf of the electricity and gas network operators. JRC notes that Energy Networks are becoming more dynamic in terms of supply and demand, e.g. Electric Vehicles and Distributed Energy Resources, are expanding dramatically. To address this more dynamic supply / demand context and to ensure that energy supplies remain robust and predictable over time the Energy Network Operators are investing in 'Smart Grid' capability. Central to the future 'Smart Grid' is enhanced operational communications capability to address increased monitoring and control of Network Assets which is wholly dependent on additional dedicated spectrum access. To this end, we welcome the ongoing sector specific work that Ofcom has undertaken to address this developing need and the contribution that this will have to delivering the Government's 'Net Zero' agenda recently defined with the Clean Power 2030 Plan<sup>1</sup>.

### **JRC Response to 'Enabling wireless in the UK economy'**

#### **The 'Net Zero Transition and the need for spectrum access:**

The Energy Transition is a Mission of the new Government and with the publication of the Clean Power 2030 Plan in late 2024 there is clear intent to establish a 'Net Zero' electricity system by 2030. In order to achieve this there will need to be a profound increase in the amount of renewable generation and storage connected to the electricity system, displacing up to 35% of existing generating capacity which is carbon based (Gas). This will result in an energy system which is predominantly dependent on generation sources which are unpredictable (wind and solar) and non-dispatchable relative to Gas. To address this increased unpredictability of generation the system will need to be made more adaptable and flexible to respond dynamically to the rapidly changing generating mix. To enable a more adaptable and flexible system, enhanced operational control of the Network Assets is a necessity which is subject to dedicated spectrum access. Whilst Ofcom undertook a Call for Input in 2023<sup>2</sup> which considered various spectrum options that may address the needs of the 'Energy Transition', the new Government has accelerated their ambition and timing for such

<sup>1</sup> <https://assets.publishing.service.gov.uk/media/677bc80399c93b7286a396d6/clean-power-2030-action-plan-main-report.pdf>

<sup>2</sup> <https://www.ofcom.org.uk/spectrum/innovative-use-of-spectrum/potential-spectrum-bands-to-support-utilities/>

a transition. Furthermore, Recommendation 27 of the National Infrastructure Commission Second Infrastructure Assessment<sup>3</sup> requires Government to *'identify the specific telecommunications needs of the energy, water and transport sectors and ensure that infrastructure is delivered to meet these by, at the latest, 2030 for the energy and water sectors and 2035 for the road and rail sectors. Strategies for how this will be achieved must be set out by the end of 2025 for energy and water and by the end of 2026 for road and rail, including:*

- *the most cost-effective network deployment models, and the extent to which infrastructure can be shared between different sectors*
- *a spectrum authorisation approach that ensures access to adequate spectrum, whether dedicated national bands or shared spectrum for infrastructure users*
- *clear responsibilities within government for delivering telecoms strategies*
- *consideration of whether dedicated networks and spectrum or upgrades to existing networks can meet specific public policy goals, including consistent and reliable rail passenger connectivity.'*

Noting the above and the anticipated direction from Government that will result, we encourage Ofcom to recognise the need for this work item in the 2025/26 work plan as the Distribution Network Operators are ready to act as soon as there is clear policy direction from Government.

Separately, we welcome Ofcom's programme of work to 'modernise and enhance the licensing platform to deliver greater automation, improve user experience and increase spectrum efficiency' and welcome the development of the existing licensing workflows.

Under Ofcom's workplan activity to 'Lead and influence international discussions on spectrum access while effectively representing UK interests' we would encourage Ofcom to ensure the continued protection of the legacy systems supporting critical national infrastructure in light of our European neighbours' plans to migrate to LTE networks in the same band with a potential for greater wideband interference.

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

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<sup>3</sup> <https://nic.org.uk/studies-reports/national-infrastructure-assessment/second-nia/>