



EUROPEAN COMMISSION
Information Society and Media Directorate-General
ICT addressing Societal Challenges
ICT for Sustainable Growth

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Mr Daniel Hec
Chairman SMCG M441
CENELEC Central Secretariat
Avenue Marnix 17
B-1000 Brussels

**Subject : Mandate M/441: SM-CG Technical report on Communications
(draft v0.4.0)**

Dear Mr Hec,

We have received the above-mentioned technical report developed in the context of Mandate M/441 and would like to raise as a matter of concern the proposed functionality 5 of the smart meter included therein: "Communicating with (and where appropriate directly controlling) individual devices within the home/building". In effect, the bundling of both metering and control functions within the individual metering device would have implications for market access, device costs and conformance testing that the Commission could not endorse.

The Commission in its Recommendation C(2009)7604 calls upon Member States to agree on a common minimum functional specification for smart meters by 2010. This Recommendation complements both the M/441 standardisation mandate and the Internal Energy Market Directives 2009/72/EC and 2009/73/EC - which calls upon Member States to have completed an economic assessment of the implementation of smart metering by 2012 - in particular in respect of timing.

Whilst the Internal Energy Market Directives 2009/72/EC and 2009/73/EC were not explicitly mentioned in the M/441 standardisation mandate, they nonetheless have a bearing for the execution of the mandate. A parallel discussion has been finalised in the Task Force for Smart Grids by the functionality not being mentioned in the reports of the Task Force groups. In this light, the proposed functionality 5 risks delaying the exercise prescribed by Directives 2009/72/EC and 2009/73/EC thus compromising their utility.

We would therefore strongly urge you to remove this functionality from your current proposal and refocus your workprogramme on smart metering (unbundled from control) so as to deliver in a timely manner on the interoperability issues essential for EU-wide roll-out and economies of scale.

Should you wish to discuss the matter further we would happy to elaborate.

Yours sincerely



Colette Maloney
Head of Unit

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