

To the kind attention of **Ditte Juul-Jørgensen**
Director-General, DG ENER, European Commission

An ambitious implementation of the EU Action Plan on Digitalising the energy system for the seamless integration of consumers

Brussels, 9 February 2023

Dear Ms Juul-Jørgensen,

The digitalisation of the energy system is critical to enhance the resilience and efficiency of an increasingly decentralised and decarbonised power network. This green and digital transition will be successful if the smarter and more connected energy system will support consumers to activate their distributed flexibility potential and reward them.

smartEn – Smart Energy Europe, the European business organisation integrating the consumer-driven solutions of the clean energy transition, welcomes the adoption of the EU Action Plan on Digitalising the energy system in late 2022.

smartEn strongly supports the establishment of a new pan-European Energy Data space fostering data interoperability leveraging distributed flexibility sub-metering which is essential for the development of a competitive level playing market for flexibility services. smartEn is committed to support the Commission in its development and has established a Digital Agenda Committee to facilitate best practise exchange throughout the Prosumer and Flexibility Service provider community.

For an efficient achievement of this ambitious objective, we recommend to:

- ensure consistency and avoid overlaps among the Expert Group 1 of the Smart Grid Task Force, the newly established Data for Energy (D4E) working group, the upcoming Code of Conduct on Energy Smart Appliances, the future EU Data Act and the network code on Demand-Side Flexibility. Clear objectives should be identified for each to avoid a confusing multiplication of frameworks which would not be beneficial for consumers and market players. smartEn is ready to actively contribute to D4E which we recommend to focus on sub-metering data exchange particularly to enable a proper historical and real-time orchestration of distributed flexibility data across all layers of the interconnected energy system;
- prevent any asset-specific approach which hampers and does not reflect the evolution towards smart energy system integration. We regret that the asset-specific approach is prevailing in D4E, specifically for the domains of buildings and electric vehicles;
- develop a common reference framework to facilitate the development of a new generation of consumer apps allowing to automate the consumer and prosumer participation in energy markets and self-consumption, as well as other types of local trading within and among energy communities, enabling new revenue sharing models for flexibility as well as cost-savings against flat tariffs;
- involve smartEn and other market players in the implementation of the Digital Twin of the European electricity grid, in addition to ENTSO-E and the EU DSO entity. The EU digital twin will promote new ways for energy companies to share data, while it should ensure that contributors are recognised and fairly compensated, respecting well defined rules and within a network of trusted data, which guarantees security, sovereignty and interoperability of data and services.

We remain at your disposal and look forward to participating in the upcoming stakeholder involvement process.

Yours sincerely,



Michael Villa
Executive Director, smartEn

ABOUT smartEn - Smart Energy Europe

smartEn is the European business association integrating the consumer-driven solutions of the clean energy transition. We create opportunities for every company, building and car to support an increasingly renewable energy system. Our membership consists of the following companies:

