



E.DSO feedback on the Roadmap of the Action Plan on Digitalisation of the Energy sector

E.DSO is the key interface between Europe's Distribution System Operators (DSOs) and the European institutions. E.DSO gathers 41 leading electricity DSOs in 24 countries, including 2 national associations, cooperating to ensure the reliability of Europe's electricity supply for consumers and enabling their active participation in our energy system. EDSO members are at the core of the digital transformation of the energy systems through innovation and continuous engagement with customers

E.DSO welcomes the opportunity to provide feedback on the European Commission's Roadmap on the Action plan on the Digitalisation of the energy sector. The energy transition, with data and digital solutions are at the heart of Europe's climate ambitions.

We consider that digital technologies are a key enabler to support the energy transition since it can facilitate the development of low carbon energy production and consumption, trigger investments in innovative solutions, support the uptake of flexibility services and ultimately help citizens become major players of the energy system.

E.DSO mirrors the Commission acceptance that a European data-sharing infrastructure is needed to develop innovative services in the energy sector. We welcome the Commission's focus on the uptake of digital technologies in the energy sector. We consider that the European action plan by the Commission shall define a clear pathway to capture the potential of digital services to reach energy and climate goals.

DSOs as key actors in digital solutions and data management in the energy sector, are convinced of the benefits of using data to improve the system efficiency. Digital processes will contribute to the overall stability of a system that is highly complex. More importantly, data regarding electricity generation, storage, demand, and flexibility of consumers must be collected quickly and processed fully automatically.

Data access and interoperability: We support the development of a standardised framework for data access and interoperability. We argue that this will allow the energy stakeholders to offer innovative services; ultimately empowering consumers in the energy transition and reducing barriers for a competitive internal market. However, it is of utmost importance that interoperability criteria should be compatible with the principles that DSOs already implemented to fulfil the requirements enshrined in the EU Directive 2019/944.

Cybersecurity: E.DSO shares the Commission's objective to enhance the cybersecurity of the energy sector, in an age of increased digitalisation. Cybersecurity is of utmost importance for all digital and data activities. Therefore, rules have to be strict enough to protect data and critical infrastructure, while giving enough freedom to effectively structure data exchange. We believe that the action plan should consider the current



revision of the NIS Directive as well as the upcoming Network Code on Cybersecurity of cross-border electricity flows.

Protection of customers' data: Last but not least, we consider it very important to ensure the protection of customers' energy data and guaranteeing citizen's trust in services. DSOs are committed to data protection rules settled by the General Data Protection Regulation and by the Electricity Market Design Directive.

E.DSO finally supports the idea that the Action Plan should meet the European Green Deal's objectives. To do so, the Commission should create the right conditions to promote sustainable digitalization.