

**From:** [Miettinen Miia](#)  
**To:** [CNECT RSPG](#)  
**Cc:**  
**Subject:** Public Consultation on a draft Report on Mobile technology evolution launched!  
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Dear Radio Spectrum Policy Group Secretariat,

I received a message regarding a public consultation about draft report on Mobile technology evolution – experiences and strategies from Heidi Himmanen (Subgroup co-chair, RSGP Mobile technology evolution & 6G development). I am grateful for the opportunity to share the comments of Finnish Energy with you. Finnish Energy represents majority of companies that produce, acquire, transmit and sell electricity, gas, district heat and district cooling and offer related services in Finland.

**Finnish Energy comments on the draft report on Mobile technology evolution – experiences and strategies:**

The observations made about smart meters are of utmost importance and the situation with meters as described is realistic. The utility companies' smart meters metering electricity, gas, water and other energies and the communication still using 2G.

It's very important that the utility companies will be informed sufficiently in advance by mobile operators in order to consider their migration to 4G/5G. For example, in Finland the electric utility companies are obliged by regulation to change the old smart meters to the new smart meters in time period from 2023 to 2031. To prevent excessive costs to customers the distribution system operators should be allowed to change meters according to existing plan. Also in the other utility companies' smart meters have expected long life so it's important to know when migration to 4G/5G will start. The information campaigns is good practice and necessity to handle it.

In Finland district heat is by far the most popular heating method in Finland in both old and new buildings. In Finland all district heating and cooling customers have remote read smart meters. These meters are continuously renewed from oldest to newest and the lifetime of one meter is roughly 10 to 15 years - this would need similar transition time as electricity network customers. Same transition time is needed with natural gas customers where the remote read meters are common.

If you have any questions about comments, I'm happy to help.

Best regards,  
Miia Miettinen

Miia Miettinen  
Senior Advisor, Networks and Services  
Finnish Energy

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