Ecodesign Preparatory study on Smart Appliances

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SH[1]	**Section No./ Subsection No./ Annex** (e.g. 3.1)	**Page and Paragraph/ Figure/Table/ Note** (e.g. p 6 para 5)	**Type of com-ment**[2]	**Comment (justification for change) by the Stakeholder**	**Proposed change by the Stakeholder**	**Consortium observations** on each comment submitted
ECOS	1.2 Definition and scope	Page 2 Section 1.2 Paragraph 2	ge	It is unclear how the characteristics of a "smart appliance" have been defined. What is the basis for the selection of the listed criteria?	Describe the rationale and literature behind the smart appliances definition to ensure transparency	
ECOS	1.2 Definition and scope 1.3.1 Horizontal approach	Pages 2 and 4	ge	We wonder what the rationale behind the exclusion of "large scale industry applications" is. The study team does not provide any analysis of the consequences of such a decision. This is even more surprising knowing that the discussions in the EC Smart Grid Task Force groups have repeatedly stressed the need to include industrial and commercial customers in the DSR schemes. Moreover, during the Ecodesign Consultation Forum on compressors, ECOS asked the Commission to assess the feasibility of setting Ecodesign requirements for the inclusion of System Frequency Controls on Compressors. The work starting on smart appliances was referred to as an answer, and no measure was taken.	Keep large scale industry application in the scope of the study	
ECOS	1.3.1 Horizontal approach	Page 2	ge	It is stated that the MEErP methodology will not fit all aspects of this lot and that a "horizontal approach" will be used. We believe that more details on these methodological choices are needed (i.e. which MEErP aspects will be followed, adapted or substituted and how) together with a	We invite the study team to provide a substantiated overview of the method to be applied and potential differences from MEErP methodology. Repercussions should be detailed, especially on the calculation of the environmental benefits.	

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				detailed assessment of repercussions, especially when calculating the environmental benefits in this study.		
EC OS	1.3.3 Special case: System Frequency Control	Page 12	ge	It is not clear why System Frequency Control is a 'special case'. Will appliances utilising this DR technique be subject to the same assessment criteria under the 'Horizontal Approach' in 1.3.1? It is also not clear under which appliances the technique will be considered.	Detail the assessment criteria SFC will be examined under. Remove 'special case'– a fair, and neutral, assessment of available DR technologies should be a core principle of the preparatory study.	
EC OS	1.3.3	Page 12, paragraph 5	te	While it is true that SFC contribution to DR would be difficult to verify and compensate in the same manner of other DR schemes, a number of other means of compensation for the provision of demand-side flexibility exist. This could include a discount on the price of an appliance, for example. Section 1.7.2 does detail incentives for end-users, but the type of incentive per DR-technique could be attributed clearly.	Clearly attribute compensation schemes that can feasibly be provided to consumer's owning a SFC-enabled appliance	
EC OS	1.5.6 Smart Meters	Page 24, paragraph 3	te	The work of the EC Smart Grid Task Force Expert Group 1 'Interoperability' has now completed the Smart Meter gap analysis of Member States. This information should be reflected, to some degree, in this report. A main finding of the work was that the application of EU standards, allowing interoperability with other DR-enabled devices across H2 and H3 interfaces is not complete, with an unclear picture of harmonised data formats and models. In addition, a large majority of Member States have not implemented H2 and H3 interfaces on Smart Meters rollouts. Further, a number of Member States have instead opted to provide energy consumption information to consumers over PLC with a web interface (with no possibility to transfer data within the home), for which no	Reflect the findings of the EC Smart Grid Task Force Expert Group 1 'Interoperability' in this report – detailing the lack of standards and interoperability between the Smart Meter and other DR-enabled devices across EU Member States. Further, detail the impact this lack of interoperability will have on the establishment of Smart Appliances and what measures could be taken to overcome such obstacles.	

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				standardised API exists within the EU. This is a serious interoperability gap.		
EC OS	1.6.2 Standards	Page 29 Figure 7	te	There are a number of factually incorrect aspects to this diagram – a thorough examination of the standards and their capabilities would be useful, for example: CLC/TC 205: prEN 50491-12 does NOT cover the H2/H3 interface; instead it covers the interface between the CEM to the HBES/Smart Devices. IEC, CLC TC 13: 62056 does NOT cover the H3 interface. Moreover, the standard series contains only requirements for the data link layer and application layer of the H2 interface. In addition, it is not clear whether the prEN 50491-12 standard and the EN 62056 standard share the same data models.	Reassess the flexibility functional architecture and accurately reflect the state of European standardisation, concerning the communication between the smart meter and the energy management gateway. It is not clear to ECOS how the provision of DR intends to operate in Europe without a comprehensive set of fully-featured standards across Member States that would avoid market fragmentation.	

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