ERDF's position paper on the European Commission's consultations on "Standards in the DSM: setting priorities and ensuring delivery" & "Regulatory environment for platforms and cloud computing and the collaborative economy"

ERDF welcomes the Commission's initiative on Digital Single Market and more particularly the two consultations launched at this occasion, and congratulates the European Commission for the quality of this set of documents. Please find hereafter the key messages we have elaborated in our answer to the consultations.

On Standards in the DSM: Setting priorities and ensuring delivery

ERDF supports the Commission's willingness to tackle the challenge of standardisation to boost innovation and competiveness of the European digital economy. In the elaboration of this new standards plan, the European Commission should take into consideration following elements:

- **Standardisation and Interoperability** should be the key drivers to guarantee and develop the new digital economy and the innovation in Europe.

- **A strong standardization strategy by Europe** should defend its digital economy face to the monopole of internet companies. It should also ensure data privacy and security.

- The European standardisation work should be based on a **relevant representation** between the many actors to **avoid imbalances** between parties in terms of access to information and technical expertise. In partnership with the users, existing utilities in charge of public infrastructures should play a neutral role in standardisation work to reduce risk of an over-representation of specific interests.

- **International Standardization Bodies** are in many cases the first priority for our industry, before European bodies. The EU should help, including financially, European stakeholders and standardisation bodies to be active and influent internationally and promote relevant coalitions of actors.

- **Resources should be used efficiently** and focused on positive CBA. A European mandate (as M490 for instance) can require huge expertise and human resources. These resources may not be available to deal with other dossiers.

On Regulatory environment for platforms and cloud computing and the collaborative economy

ERDF is satisfied with the comprehensive approach that the Commission is pursuing on the free flow of data.
ERDF is deeply involved in a proactive and responsible process of open data. In parallel with its own open data website, the company works on open data with the multi-sectorial open data platform under the authority of the French government (Etalab). In partnership with French data protection authority (CNIL) and French energy regulator (CRE), ERDF is committed and actively working on improving regulatory framework and its open data competencies. ERDF supports following points:

- The energy sector should keep a **common framework regulation** on data privacy, protection of knowhow and national security.

- **A data privacy by design approach** is necessary to take into account the ethical dimension in the data treatment.

- With the development of Internet of Things, the **role of data operator as trusted third party for data protection** (e.g DSOs and smart meters) **should be secured** by the regulatory environment (private and sensitive data).

- **Data linked to know-how and industrial expertise should be protected**.

- A particular attention should be brought to data protection and to **reinforcement of cloud service providers' responsibility** to promote usage of cloud services.

ERDF remains at the European Commission's disposal for any further question on these issues or any other topics related to our activities, and remains highly engaged in the development of the European digital market.