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MP293

‘Deferment of DCC Planned Maintenance during Adverse Weather’

Modification Report

Version 0.4

6 March 2026

Corporate member of
Plain English Campaign
Committed to clearer
communication

592



About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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This document also has two annexes:

- **Annex A** contains the Business Requirements for the Proposed Solution.
- **Annex B** contains the Data Communications Company (DCC) Preliminary Impact Assessment.
- **Annex C** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

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1. Summary

This proposal was raised by Abigail Watson from Scottish Power Electricity North-West (SP ENW).

In June 2021, the Data Communications Company (DCC) raised a similar Modification, MP166 'Adverse Weather Planned Maintenance Process', with a view to exploring the impact on their service provision of an adverse weather event during a Planned Maintenance event. Following a review of provisional costs associated with delivery of the Modification, and at that time there being no recorded occurrence of clash between adverse weather and a DCC planned outage, MP166 was withdrawn. This Modification seeks to re-explore this issue as new information relating to the costs and benefits has become available.

MP293 was raised to re-examine this issue following an overlap between a named storm, Storm Daragh, and a DCC Planned Maintenance. This overlap highlighted the material impact on Network Parties of such an occurrence. Planned Service Disruptions (including Planned Maintenance, some Unplanned Maintenance, and Business Continuity & Disaster Recovery (BCDR) tests) also pose challenges for Suppliers with prepayment customers. Where such an outage occurs, Suppliers are less able to support top-up functionality for consumers with Smart Meters in prepayment mode. The SEC Change team and the Proposer therefore sought a solution whereby Network Parties (and also Suppliers) may retain critical Device functionality even during a Planned Service Disruption.

To address this, MP293 proposes an Enhanced Availability (EA) service as the primary Proposed Solution; and will enable Network Parties and Suppliers to execute critical operational tasks, power restoration and provision of services to prepayment customers, respectively, during DCC Planned Service Disruptions. The EA service would keep a defined subset of SRVs and Alerts operational during Planned Service Disruptions by routing them through a dedicated deployment of DSP1. Under an alternative option for the EA service, Supplier-benefitting prepayment Messages (such as SRV 2.2, SRV 4.3, and Alert N56) would also remain available, protecting prepayment customers from losing the ability to top-up during an outage. This approach preserves critical operational visibility for Network Parties while simultaneously preventing unnecessary loss of supply for prepayment consumers, offering a more robust and enduring mitigation than a deferral-only approach.

The DCC's preliminary estimates indicate that delivering the EA service into DSP1 will cost £610k–£820k (EA Option 1) or £680k–£900k (EA Option 2), with optional extensions into Communication Service Providers (CSPs), SMETS1 and SMETS2 Service Providers, available at additional cost. Delivery into DSP2 is also technically feasible but expensive. Implementation of the core DSP1 EA service is achievable for the November 2026 SEC Release, provided a decision to approve is received by 26 August 2026, allowing for the required 3-to-6-month delivery window.

2. Issue

What are the current arrangements?

A high impact Planned Maintenance event (the impact rating relevant to the scope of this Modification) is one in which there is Material Risk of disruption to the provision of services. SEC Section A.1 'Definitions & Interpretations' defines it based on one or more of the following criteria being met:

- i. end-to-end communications between Users and Communications Hubs in either direction;
- ii. install & commission activities;
- iii. previously scheduled Smart Metering Equipment Technical Specification (SMETS)¹ migrations.

Business Continuity & Disaster Recovery (BCDR) testing is also in scope of this Modification, as is some Unplanned Maintenance. Collectively, Planned Maintenance, Unplanned Maintenance and BCDR testing shall be referred to as "Planned Service Disruptions"¹, as this will be relevant in the context of the Proposed Solution.

The Met Office define adverse weather conditions using a number of predictable variables. A Yellow, Amber & Red² rating system is applied to weather events, calculated against a matrix of predicted impact vs likelihood. The Met Office calculate impact³ based on the type of weather (i.e., thunderstorms, snow, rain), the geographic spread of the weather event, and the predicted scope of disruption and risk to life.

Currently, if a Planned Service Disruption is set to coincide with adverse weather, it is within the DCCs purview to determine whether that outage should proceed. During Storm Daragh, a Planned Maintenance proceeded following requests from some Network Parties seeking a deferment; some Network Parties reported that this overlap exacerbated existing operational and logistical complexities arising from business-as-usual adverse weather recovery activities. Network Parties also reported that the overlap resulted in their inability to realise the benefits to Network Parties of being a DCC User during that outage.

What is the issue?

SEC Section H 'DCC Services' establishes arrangements for Planned Maintenance events under clause H8 'Service Management, Self-Service Interface and Service Desk'. BCDR testing is detailed in Clause H10 'Business Continuity'. Currently, there are no provisions within Section H8 and H10 for the deferral of a Planned Maintenance event or BCDR tests where an adverse weather event occurs during the scheduled period. Additionally, clauses H8.2 and H10.9 require the DCC to conduct Maintenance and BCDR testing in a minimally disruptive manner.

Without clear, codified provisions on how a deferral might be managed in the context of adverse weather, any decision to defer may be considered to be disruptive as SEC Parties would have no way to predictably or reliably determine if a Planned Maintenance event may be deferred, as the decision to do so is currently entirely within the gift of the DCC.

¹ A new definition is proposed for SEC Section A 'Definitions & Interpretations'

² [Met Office weather warnings guide](#)

³ [Met Office National Severe Weather Warning Service Impact tables](#)

Additionally, clause H8.4A of Section H states that where additional Maintenance is required in support of a previously scheduled Maintenance, notice of that event must be communicated:

- a) at least 10 Working Days in advance of any additional Low Impact Planned Maintenance; and
- b) at least 20 Working Days in advance of any additional High Impact Planned Maintenance

This means that any changes to a Planned Maintenance event, such as a deferral due to an adverse weather event, must either be re-classified as Unplanned Maintenance, or must be deferred based on the criteria established in paragraph H8.4A, potentially causing a significant delay.

What is the impact this is having?

Impact on consumers

For consumers affected by adverse weather, they may experience significant disruption to their energy supply. This disruption may be as severe as going off supply for an extended period. Any factor that might hinder the ability of a Network Party to respond to damage affecting consumer supplies, such as a Planned Maintenance event, may exacerbate impact to consumers.

Impact on Network Parties

The Proposer (A Network Party) has reported that they and others experienced disruption to their provision of adverse weather recovery services as a result of not having access to communicative Devices. This impact was quantified during Storm Daragh by Data on Network Party impacts that was unavailable during the progression of MP166. It has also been reported that organisations who provide services to Network Parties will also be impacted on a consequential basis.

There is an additional impact to Network Parties in that there may be a threat to life for on-site operatives. Should an DCC Planned Maintenance and adverse weather overlap, the loss of Device functionality may cause the Network Party to deploy more staff into the adverse weather area than they might otherwise have had to. These staff will be checking to see if power has been restored in areas affected by the adverse weather as the overlap hinders the ability to do this remotely, and they may be more exposed to the associated risks as a result of their presence in those areas.

Impact on DCC

The DCC have indicated that both they and their Service Providers will be impacted should a Planned Maintenance need to be cancelled and/or re-scheduled. These impacts include, but are not limited to:

- **Effect on their Operational Performance Regime (OPR):** Unplanned Maintenance is subject to OPR reporting for Service Availability. An Unplanned Maintenance period may need to be carried out for a variety of reasons that may or may not have initially been addressed during a Planned Maintenance period. The OPR is defined within the DCC Licence.
- **“Domino Effect” on other Planned Maintenance:** When the DCC conduct a Planned Maintenance, it may be that outcomes from a prior Maintenance are required to facilitate it. As such, cancelling a Maintenance in June, for example, may prevent a July maintenance from taking place.
- **Consequential Impact on Service Providers:** Planned Maintenance may involve activities conducted by the DCCs Service Providers. Where a Planned Maintenance is cancelled, this will have an impact, both financially and operationally, on the Service Providers who had been scheduled to support.

- **Mitigation of Incidents:** If a Planned Maintenance is required to prevent an Incident (i.e., a critical maintenance), then deferral of this Maintenance may result in a disruption to DCC Services more detrimental to DCC Users (including Network Parties) than any disruption which may have resulted had the Maintenance not been deferred.

3. Solutions

Solution Option Overview

This Modification contains two distinct solution alternatives, the “Deferral” solution and the “Enhanced Availability” service. The Enhanced Availability (EA) service in turn contains two sub-options; one raised by the Proposer, and another raised by the SEC Working Group.

Deferral Solution

The Deferral Solution would introduce clear, codified rules into the SEC requiring the DCC to postpone a Planned Service Disruption when it is forecast to coincide with a materially significant adverse weather event. This mechanism would be underpinned by an objective impacts matrix that assesses weather severity, geographic coverage, and the criticality of the scheduled maintenance. Its purpose is to ensure Network Parties retain essential access to Smart Metering System communications during major weather-related outages, enabling them to restore Supplies efficiently and safely.

The policy criteria to be codified are to be based on mandatory requirements, reflecting the Proposer’s preference for predictable and transparent triggers rather than discretionary decisions. The solution aims to provide a proportionate, structured framework that limits unnecessary deferrals while ensuring that severe weather events and associated consumer impacts are prioritised appropriately.

At the time of publication of this Modification Report, this Solution Option is still being refined as the Enhanced Availability (EA) Solution Option is being preferentially developed as the Proposer’s primary preference for the final MP293 Proposed Solution, as it provides the most certainty to Network Operators and their customers. As such, the Refinement Consultation planned for March 2026 will focus solely on the EA Proposed Solution option, as described below.

Enhanced Availability Service

Overview

The EA service would establish a service that remains operational during Planned Service Disruptions, allowing specific Service Reference Variants (SRV) and Alerts to continue to be processed even when the core Data Service Provider (DSP) is offline. The EA Service would provide continuous access to a defined subset of Messages to ensure Network Operators can verify supply status remotely and Suppliers can maintain key prepayment functions during outages.

The EA service would run on a dedicated deployment of the DSP motorway, activated via configuration changes on the F5 Load Balancer to ensure performance under adverse weather conditions.

The EA service would be delivered within the SEC by changes to SEC Section H ‘DCC Services’ to establish the scope, purpose and terms of operation of the EA service. Consequential changes to SEC Section A ‘Definitions and Interpretations’ would also be delivered to define the Enhanced Availability service, and the outages that it would be deployed in respect of.

Solution Option 1

This is the Proposer’s original option, and includes the following SRV and Alert:

- SRV 7.4 – ‘Read Supply Status’, and
- Alert AD1 – ‘Power Outage Event’.

Solution Option 2

This is the alternative Solution option, and was proposed during the December 2025 meeting of the SEC Working Group (please see relevant section of the Modification Report for more details), and includes the following SRVs and Alerts:

- SRV 7.4 – ‘Read Supply Status’, and
- Alert AD1 – ‘Power Outage Event’.
- SRV 2.2 - Prepay Top-up device;
- SRV 4.3 – ‘Read Instantaneous Prepay Values’; and
- Alert N56 – ‘SMETS1 Service Provider Provision of prepayment top-up UTRN’.

Additional Solution “Add Ons”

The DCC have advised of, as part of the Preliminary Impact Assessment response, a number of different “add on” options:

- SMETS2 Communication Service Providers (CSP) – Introduces the EA service into the CSPs (for both Central & South, and North), which would prevent queuing of Messages where the CSP is experiencing an outage in addition to a concurrent DSP outage.
- SMETS2 (4G Comms Hubs), AD1 Alert Only – Changes to Device Manager to expand the EA service into SMETS2 4G Communications Hubs, allowing for AD1s (which are sent by SMETS2 Devices only) to continue to be sent by Devices during outages affecting those Devices.
- SMETS1 Service Providers⁴– Introduces the EA service into SMETS1 Devices, allowing Messages to continue to be sent by those Devices where they are affected by a SMETS1 Device outage.

Additionally, it is possible to implement the EA service into DSP2. DSP2 is expected to have a service measure of 99.95% uptime, although this expectation cannot be fully ratified until DSP2 has gone-live. Changes made to DSP1 to implement the EA service will not automatically be rolled into DSP2. They must be built and delivered independently, at their own cost.

⁴ Initial Operating Cohort (IOC), Middle Operating Cohort (MOC), Final Operating Cohort (FOC), & Data Communications Operator (DCO)

Any combination of these options may be opted for alongside the “Core” changes to As Is DSP. The “Add on” options are expected to have their own benefits independent of the additional functionality that they are expected to add to the DSP1 solution. The benefits of the “Add On” options would endure indefinitely, and provide their benefits to DSP2. For example, opting to add the EA service functionality to CSP will mean that, in the future, where DSP2 experiences an outage, CSP will remain active.

Summary:

The EA service therefore has a single “core” solution which will be delivered in DSP1. The proposed DSP1 changes may either be in respect of Solution option 1 “Must” or Solution option 2 “Must & Should”.

It will also be possible to opt for delivery of the EA service into DSP2. The DSP1 solution will not automatically roll over into DSP2.

Lastly, it will then be possible to select any, or all, of the following possible “Add On” options: CSP, SMETS1, or SMETS2 4G Comms Hubs. These “Add On” options will impart a lasting functionality and apply to DSP1 and DSP2; DSP1 from its respective go-live, and DSP2 at such a time as it goes-live.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
✓	Electricity Network Operators		Gas Network Operators
	Other SEC Parties	✓	DCC

Breakdown of Other SEC Party types impacted			
	Shared Resource Providers		Meter Installers
	Device Manufacturers		Flexibility Providers
	DCC Other Users		MAPs/ MAMs

The DCC will be impacted as they will need to build and deliver changes to the DSP, as well as any selected CSPs, SMETS1 Service Providers, and the Device Manager. In respect of the Deferral Solution option, the DCC will be impacted in that a deferral will have contractual ramifications for both themselves and for their Service Providers, who have been engaged to perform a Maintenance activity, but are then no longer required to perform that activity at short notice.

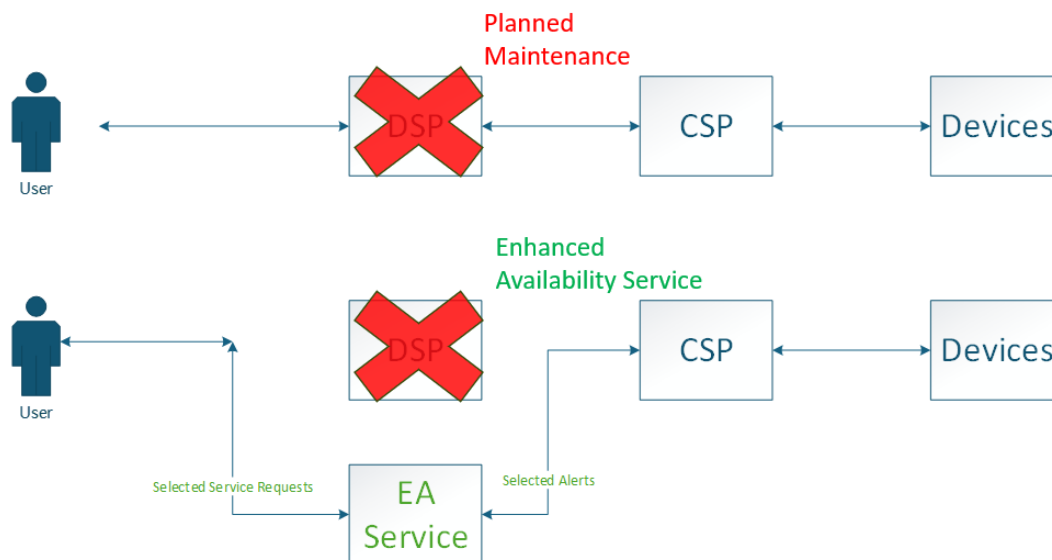
Electricity Network Parties and Energy Suppliers will be positively impacted as a result of both Proposed Solution options, as they are the primary beneficiary of any changes that would enable them to better communicate with Smart Meters during an adverse weather event / DCC System outage overlap.

Conversely, Suppliers may expect a negative impact from the Deferral Solution option, in that activities that they have planned to coincide with a DCC Planned Maintenance would themselves need to be deferred in the event of a DCC deferral, which would likely incur an organisational cost.

DCC Systems

DCC System changes

The EA service will entail DCC System changes. Changes are proposed to the current DSP, referred to in the Preliminary Impact Assessment as “As Is DSP”, and here as “DSP1”. During a system outage, the DSP is no longer able to pass Messages between the User and the Communications Service Provider, resulting in an effective communications outage. The EA Service will consist of an alternative deployment of DSP motorway components to allow the inactive DSP to be “bypassed”. The following graphic provided by the DCC demonstrates the means by which this will take place.



The full impacts on DCC Systems and DCC’s proposed testing approach can be found in the DCC Preliminary Impact Assessment response in Annex B.

DCC System traffic

No impacts are anticipated on the DCCs System traffic as a result of the EA service. Traffic through the EA service is expected to be comparable to traffic that might normally pass through standard DSP systems for the selected SRVs and Alerts during an adverse weather event where no Planned Service Disruption is in effect. Anticipated DCC System traffic volumes for the SRVs and Alerts in scope of the Enhanced Availability solution can be found in Business Requirements in Annex A, under Requirements 11 and 12.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section A ‘Definitions & Interpretations’

- Section H 'DCC Services'

The changes to the SEC required to deliver the proposed solution can be found in Annex C.

Technical specification versions

No changes are proposed to technical specification documents.

Devices

Devices impacted			
	Electricity Smart Metering Equipment		Gas Smart Metering Equipment
✓	Communications Hubs		Gas Proxy Functions
	In-Home Displays		Prepayment Meter Interface Devices
	Standalone Auxiliary Proportional Controllers		Home Area Network Connected Auxiliary Load Control Switches
	Consumer Access Devices		Alternative Home Area Network Devices

Should the Proposer instruct the SEC Change Team to explore expanding the EA service Solution into 4G Communications Hubs in order to allow a reduction in the downtime window for the AD1 Alert on SMETS2 Devices, then there will be an impact on Communications Hubs. The DCC's Preliminary Impact Assessment indicates that these changes would be delivered by the Device Manager.

Consumers

For both Proposed Solution options, there will be a positive impact on consumers. Where Network Parties do not have access to communication with Devices during an adverse weather event, they must deploy resources that they might otherwise not have deployed. In doing so, it may take longer to determine the size and scale of the impact of an adverse weather event on their consumers than it might have otherwise. As a result, any change that allows a Network Party to more efficiently and rapidly assess and respond to the damage caused by an adverse weather event will have a positive effect on consumers.

Additionally, the alternative Enhanced Availability solution will have a positive impact on prepayment consumers. During a Planned Service Disruption, prepayment consumers who have a Smart Meter in prepayment mode will not be able to top-up as the Messages that facilitate a top-up cannot be sent or received. By allowing these messages to be sent during a DCC System outage via the Enhanced Availability service, these consumers will benefit as their ability to top-up will be restored.

Other industry Codes

There is no impact on any other industry Code.

Greenhouse gas emissions

The Proposed Solution will allow Network Parties to deploy fewer on-site operatives than they might have otherwise. As a result, less infrastructure need be utilised, transportation logistics will be reduced, collectively resulting in a reduction in Greenhouse gas emissions arising from these logistical deployments.

5. Costs

DCC costs

The following DCC costs are in respect of the Enhanced Availability (EA) solution. The estimated DCC implementation costs to implement this modification are £610K-£820K for EA Option 1, and £690K-£900K for EA Option 2. These are Rough Order of Magnitude (ROM) costs from the Preliminary Impact Assessment. The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	Cost (ROM)
Design, Build and Pre-Integration Testing (PIT)	
“Core” Solution – As Is DSP (DSP1)	
<i>Solution Option 1</i>	£610K-£820K
<i>Solution Option 2</i>	£680K-£900K
Optional “Add Ons”	
<i>SMETS2 CSPs</i>	£400K-£450K
<i>SMETS2 (4G Comms Hubs) AD1 Alert Only</i>	£900K-£1.1M
<i>SMETS1 Service Providers (IOC, MOC, FOC, DCO)</i>	£2.5M-£4M
Future DSP (DSP2)	£2M-£3M
Systems Integration Testing (SIT)	TBC
User Integration Testing (UIT)	nil
Implement to Live	TBC
Application Support	£25,000/Month

Any combination of the “Add On” options may be implemented alongside the “Core” DSP1 change. As such, a cost-benefit assessment will be made in respect of each of individual options as they must be considered in their own right. More information can be found in the DCC Preliminary Impact Assessment response in Annex B.

SECAS costs

The estimated SEC Change Team implementation costs to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

In respect of the Enhanced Availability service, SEC Parties are not anticipated to incur costs, however, this assumption will be confirmed during the Refinement Consultation.

In respect of the Deferral solution, SEC Parties are anticipated to incur costs. It is expected that Suppliers (both Large & Small) will incur costs arising from having to defer activities that they had planned around, and in anticipation of, DCC Planned Maintenance. Should that Planned Maintenance be deferred, then the Supplier would have to re-arrange their own activities planned around the Planned Maintenance, likely, at cost. However, this assumption will be confirmed during a Refinement Consultation on this Solution option.

6. Implementation approach

Recommended implementation approach

The SEC Change team is recommending an implementation date of:

- **6 November 2026** (November 2026 SEC Release) if a decision to approve is received on or before 26 August 2026; or
- **Ad-hoc** SEC Release if a decision to approve is received after 26 August 2026

The “core” changes to DSP1 needed to deliver the EA service must be delivered by 6 November 2026. The DCC have confirmed in the Preliminary Impact Assessment that this is technically possible, but that no later implementation is possible. Given that a 3-6 month lead time has been indicated by the DCC, the decision to approve MP293 must be received in time to allow for this prior to the cut-off implementation date of 6 November 2026. Should a decision not be received before 6 August 2026 the DCC will need to confirm if it can achieve implementation in a reduced time frame.

Should the Proposer opt to explore expanding the EA service into either DSP2, CSP or SMETS1 Service Providers, then the lead times for these services are likely to be longer than 6 November, resulting in a phased implementation.

Communications Hub firmware dependency

Should the Proposer opt to explore expanding the EA service into the Device Manager for the AD1 Alert on SMETS2 Devices using 4G Comms Hubs, then the changes needed to deliver this functionality have an expected lead time of 18 months.

7. Assessment of the proposal

The Proposer asked the SEC Change Team to explore two solution options for MP293:

1. Requiring the DCC to defer a Planned Maintenance when it will overlap with an adverse weather event.
2. The DCC will make a limited number of SRVs/Alerts available to Network Parties during a Planned Service Disruption.

These solution options will be developed in parallel and are subject to different considerations and assessment.

Areas for Assessment – Deferral Solution Option

Underlying Issue

Adverse weather events can be highly disruptive to Electricity Network Parties and their customers. It is the responsibility of the Network Party to respond to damage to their infrastructure caused by an adverse weather event, such as a storm and aim to restore power to off-supply customers as soon as possible. Network Parties rely on the ability to interact with Communication Hubs for Smart Meters to determine the size and scale of damage to their network caused by an adverse weather event and to check if a customers' power has been restored following restoration activity. By ascertaining if a Device is responsive, and repeating this across a given geographic area, the Network Party may more accurately map which areas of their network are most affected (and if they have successfully restored power) in order to determine how to manage their response.

Where a DCC Planned Service Disruption (including Planned Maintenance, Unplanned Maintenance, and Business Continuity & Disaster Recovery (BCDR) testing) overlaps with an adverse weather event (both during and following the event), a Network Party may lose the ability to communicate with a Device, therefore losing critical functionality of the DCC network that Network Parties utilise during adverse weather events. When MP166 was considered, it was deemed that such an overlap would be unlikely, having never occurred before, and therefore, a cost-benefit test could not be met and the Modification was withdrawn.

In the last 15 months (from the date of publication of this document) there have been four overlaps between named storms and planned DCC System outages. Electricity Network Parties have requested a deferment of two of these DCC planned outages; both of which were rejected by the DCC⁵. As an example, Storm Daragh⁶, a Meteorological (Met) "named storm", occurred during the days immediately prior to a Planned Maintenance window on 10 December 2024. On the 7 December 260,000 customers were without power, with 23,000 still remaining off power by the 10 December⁷ Network Parties have reported that this overlap was disruptive to their response approach.

The overlap of Storm Daragh and a DCC Planned Maintenance event has provided real-life data on the costs and impacts of this issue which was unavailable at the time of MP166. As such, the Proposer has raised this Modification with a view to codifying a defined set of criteria which would need to be met to trigger the deferment of DCC System outage.

⁵ Clashes between DCC planned outages and names storms: Storm Ashley (October 2024 with a BCDR test), Storm Darragh (December 2024 with a HMW, Storm Eowyn (January 2025 with a HMW and Storm Bram (October 2025 with a HMW), Deferment requests for DCC planned outages were rejected for Storm Darragh and Storm Bram.

⁶ [Met Office: Storm Daragh](#)

⁷ [Storm Darragh updates – Energy Networks Association \(ENA\)](#)

Quantification of Impact

The SEC Change team has worked with the DCC and with Network Parties to understand ways in which they may be impacted as a result of a Planned Maintenance either being deferred or not deferred respectively. These impacts are detailed in Section 2 of this document. However, the SEC Change team will need to quantify these impacts in order to determine whether a cost-benefit test can be met for this Modification.

When MP166 - 'Adverse Weather Planned Maintenance Process' was raised to explore this issue previously, it was withdrawn due to high implementation costs identified by the DCC and its Service Providers. As there had never been an overlap between a Planned Maintenance and an adverse weather event when MP166 was being considered, the benefits case identified by Network Parties was purely theoretical. As there has now been an overlap, there is real-world data to explore to substantiate the benefits case for Network Parties.

The SEC Change team will need to work with the DCC to understand the full scope of their impact as a result of deferring a Planned Maintenance (on both the DCC, their Service Providers, and DCC Users) on a quantifiable basis. The SEC Change team will also need to quantify the impact on Network Parties arising from the Storm Daragh / Planned Maintenance overlap in December 2024 – Costs from not having had access to Device communications must be calculated relative to costs incurred from a comparable adverse weather event where Device communications were viable. This will allow for a more equal determination of cost-benefit. The SEC Change team are asking for more information on impacts to Parties in the Refinement Consultation.

DCC Planned Maintenance Deferral Decision Matrix

The Proposer has suggested that an adverse weather impacts matrix could be used to determine if the criteria have been met for a deferral of DCC Planned Maintenance. The Proposer's rationale for a matrix is that it would provide a consistent and predictable way of determining ahead of time if a deferral should be considered. Due to the fast-moving nature of an adverse weather event, processes governing convention of a Panel decision (or similar) on an ad hoc basis may not be agile enough to respond.

The SEC Change team will work in collaboration with the DCC, Network Parties and other affected SEC Parties to determine how this matrix will be constructed. Assuming a matrix with size of affected area vs severity/impact, factors to consider will include:

- **Adverse weather severity:**
 - How will severity be determined? Should it be based on the established Met Office colour grading system of yellow, amber & red? Or should it use a different metric?
 - Should the severity differentiate between different types of adverse weather? For example, should an adverse weather warning primarily relating to impact from snow and ice have a differential rating to one primarily relating to wind and rain?
- **Size of adverse weather impacted area:**
 - How should the spread of the adverse weather be determined?
 - If determined against Grid Supply Point (GSP) groups, should adverse weather in one part of Scotland (a large GSP area in km²) result in DCC Planned Maintenance being cancelled across all of Great Britain?

- Should there be a minimum number of affected areas before deferral is considered? For example, should a minimum of two areas be required before deferral can be considered?
- **Type of DCC Planned Maintenance:**
 - Should a higher matrix score be required for more critical DCC Planned Maintenance to be deferred?
 - If so, how will this be determined?
- **Time of year consideration:**
 - Should there be two matrices, one for DCC Planned Maintenance in the summer and one for the winter? This would be reflective of the differing size and scale of adverse weather over the course of the year.

Assessment Outcome

Outstanding questions in respect of the Deferral Proposed Solution option will be resolved at a later date, in respect of the Proposer's wish to preferentially explore the Enhanced Availability Proposed Solution option. The SEC Change team welcome views on this point.

Deferral decision: Ownership & Determination

Where the matrix indicates that a DCC Planned Maintenance should be deferred, two questions need to be answered:

1. Is the matrix outcome final and binding? i.e., where the matrix indicates that a DCC Planned Maintenance must be deferred, will this be automatically triggered with no other stakeholder input required?
2. Should the matrix outcome be non-binding, instead acting as a trigger to consider deferral where conditions are met, who shall own the final decision on whether to defer the DCC Planned Maintenance? Should this be the DCC, SEC Panel, SEC Change team, or some other body of combination thereof.

Assessment Outcome

Outstanding questions in respect of the Deferral Proposed Solution option will be resolved at a later date, in respect of the Proposer's wish to preferentially explore the Enhanced Availability Proposed Solution option. The SEC Change team welcome views on this point.

Interim Deferral Policy Agreement – DCC & Network Parties

Over the course of 2025, Network Parties have been engaging with the DCC in conversations supported by the Department for Energy Security & Net Zero (DESNZ) aimed at developing a policy document regarding the criteria against which the DCC would defer a Planned Maintenance that would be concurrent with an adverse weather event. Currently, an agreement has not been reached. A mutually agreed deferment criteria is preferred but not a requirement to form the basis of the legal drafting for the MP293 deferral solution. In absence of agreement the Proposer will work with Network Operators on their preferred criteria.

During the progression of MP293, two versions of the draft policy document were in discussion: V2.7 and V2.8. Broadly, V2.7 represented a position supported by Network Parties, but lacking support from the DCC. In contrast, V2.8 represented a position supported by the DCC, but lacking support from Network Parties.

At the time of publication of this document, the DCC are exploring a V2.9. However, the Proposer has instructed the SEC Change team to draft legal text that would codify V2.7 of the draft policy document into the SEC.

Assessment Outcome

Outstanding questions in respect of the Deferral Proposed Solution option will be resolved at a later date, in respect of the Proposer's wish to preferentially explore the Enhanced Availability Proposed Solution option. The SEC Change team welcome views on this point.

Areas for Assessment – “Enhanced Availability” service

Initial Considerations & Introduction into scope of MP293

During discussions on the deferral solution option, the DCC raised the prospect of a potential solution in which a small number of SRV and/or Alerts could be kept on during a Planned Maintenance. In this way, even when an adverse weather event happens concurrent with a Planned Maintenance, a Network Party could still be in communication with a Device via one of the “Enhanced Availability” SRVs. As a result, both the DCC and Network Parties could achieve their operational goals during a Maintenance and an adverse weather event respectfully, without detriment to the other.

The Proposer has asked the SEC Change team to explore the “Enhanced Availability” solution alongside the deferral solution option, with a preference for the “Enhanced Availability” solution as the primary means of resolving this Modification's problem statement. Following discussion between Network Parties and the Energy Network Association (ENA), the trade association for Network Parties, the Proposer has identified two SRVs/Alerts that they believe would enable sufficient communication with Devices during an adverse weather event. These are SRV 7.4 – ‘Read Supply Status’, and Alert AD1 – ‘Power Outage Event’.

Assessment Outcome

As of the publication of this version of the Modification Report, 7.4 and AD1 are still under consideration, and form the entirety of Enhanced Availability Solution Option 1.

“Enhanced Availability” SRVs/Alerts

The DCC have recommended that the SEC Change team and Proposer consider Solution option 2 of the “Enhanced Availability” service that would include five SRVs/Alerts, where two are for Network Party benefit, and the remaining three may ones that are useful for Suppliers. These Supplier-centric SRVs/Alerts could be used for Prepayment Device functions and could support top-up functionality during an adverse weather event, for example. The SEC Change team suggested to the Proposer, in its role as a “Critical Friend”, that an expansion of the scope of the MP293 “Enhanced Availability” solution to encompass SRVs/Alerts that have appeal to other SEC Parties beyond Network Parties may strengthen the cost-benefit equation for this Modification.

During the early refinement of the Proposed Solution, the Proposer asked the SEC Change team not to pursue this expansion in scope, however. It is their view that as this Modification was raised to address problems specific to Network Parties, i.e., to enable them to fulfil their obligations to consumers in respect of supply restoration following adverse weather events, that the scope should remain limited to Network Party benefits only. However, the Proposer explained they had written to trade association Energy UK to notify them of this additionality and did not receive a response. They suggested that if another party wished to raise, they are free to do so via the various sub committees they would have no objections. The SEC Change team advised the Proposer that this more limited

scope can be progressed, but that a narrowing of the benefits case relative to the cost may result in this Modification facing greater barriers in terms of approval.

Assessment Outcome

At the December 2025 meeting of the SEC Working Group (please refer to relevant section of the Modification Report for more details), Members directed the SEC Change Team to explore an alternative Enhanced Availability solution containing SRVs and Alerts that would benefit Suppliers by allowing them to facilitate top-ups for Smart Meters in prepayment mode, alongside the Network Party Messages.

Implementation & Delivery Considerations

The Proposer initially indicated that they would like implementation as soon as possible. As the core issue of MP293 relates to consumer detriment, and the potential endangerment of both consumers and also Network Party staff, it is their wish that this Modification is delivered as soon as possible. As such, the Proposer has asked the SEC Change team to explore how the EA service can be delivered in the earliest possible timeframes.

As part of initial conversations, the SEC Change team raised the prospect of delivery into DSP1 with the DCC. At that time, the DCC indicated that implementation prior to November 2026 is highly unlikely due to both design, build, and test requirements, combined with the necessary governance steps in the progression of the Modification. Additionally, they advised that delivery into DSP1 is likely to be highly costly, though a value cannot be provided until a Preliminary Impact Assessment is conducted. The SEC Change team has advised the Proposer that in seeking to implement the “Enhanced Availability” solution into DSP1, they are likely to incur significant costs relative to the expected benefits of a marginally earlier implementation. The Proposer indicated that they would like to proceed against DSP1, however.

The DCC has indicated to the SEC Change team and the Proposer that they expect that DSP2 will have very limited downtime and may require as little as four hours of Planned Maintenance a year. Based on the DCC’s assessment, the expected return for delivery of the proposed solution into DSP2 may therefore not be proportionate relative to the cost. The Proposer indicated that they would like to pursue implementation into both DSP1 and DSP2.

Assessment Outcome

The DCC have since indicated that implementation of the “Core” DSP solution into DSP1 is possible for November 26. The DCCs Preliminary Impact Assessment has indicated that a three-to-six-month lead time is required for delivery of the changes to DSP1. As DCC System changes targeting DSP1 must be implemented by November 2026, the current timelines for this Modification may present challenges in meeting that deadline. The SEC Change team are taking steps to expedite the progression of this Modification, but will welcome views on the implementation and lead time during the planned Refinement Consultation. Developing the EA service in DSP1 will not result it in being transferred into DSP2; the EA service would need to be separately built and delivered into DSP2 as part of a separate line of work.

DSP2 Uptime

The DCC have indicated that they expect DSP2 to experience uptime of 99.95%. This is due to the different architecture of DSP2 relative to DSP1; by its design, it is expected to be less prone to Planned Service Disruptions. As a result, the relative benefit of implementing an EA service into DSP2 is brought into question. In a system with only two hours of downtime a year, the cost incurred by deploying a solution to mitigate for those two hours may not pass a cost-benefit assessment.

However, the DCC are not able to unequivocally confirm that DSP2 will never drop below 99.95%. This is an expectation based on current project parameters, but the operational reality will only be confirmed once DSP2 has gone-live. As a result, SEC Parties wishing to make a judgement on whether the £2M-£3M cost provided by the DCC to implement an EA service into DSP2 will be justified. This judgement must be based on a SEC Parties own assessment of the anticipated downtime for DSP2, based on the information provided by the DCC, and their own views.

Sub-Committee Input

SECAS will engage with the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC), the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA), the Testing Advisory Group (TAG) and the Privacy Sub-Committee (PSC) to confirm what input is required from these forums.

SECAS believes the following Sub-Committees will need to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	Assess any potential operation impacts as a result of the potential solution(s).
TABASC	Assess any potential technical impacts as a result of the potential solution(s).
SSC	Assess any potential security impacts as a result of the potential solution(s).
TAG	Assess any potential testing impacts as a result of the potential solution(s).
PSC	No input required
SMIKI PMA	No input required

Observations from Sub-Committees

Discussions at Change Sub-Committee (CSC) – June 2025

A question was raised asking if it is not only the Data Service Provider (DSP) and the DCC Service Providers, but also the wider DCC Users who are impacted. The SEC Change team advised they will take this on board as they progress and explore the impact of the solution. A point was also raised to note that there have been instances where consumers have been notified of a loss of Device functionality due to a Planned Maintenance, and that where this is deferred with short notice, consumer advice has therefore become inaccurate.

The Proposer and the SEC Change team noted similarities between MP293 and MP166 but noted that there is a difference between the two modifications; when MP166 was considered, an adverse weather event had never occurred at the same time as a DCC Planned Maintenance, and as such the impacts were theoretical. They went on to note that in December 2024 there was such an overlap, and that impact could therefore now be quantified. The Proposer referenced their suggestion relating to a Planned Maintenance deferral decision matrix.

A question was raised asking if MP293 would impact the six Service Providers for DSP2, rather than one Service Provider as per the current DSP arrangements. They noted that current architecture is different relative to DSP2; the SEC Change advise this will be taken this into consideration. A point was raised by the CSC Chair advising that the SEC Change team will be also be exploring a similar Modification, MP294 'Review of DCC Maintenance Activities and Temporary Additional Allowance', and these two modifications may impact on each other. This will be considered during the progression of this Modification.

A question was raised asking how adverse weather events are categorised. The SEC Change team will explore and take note of how the Met Office calculate adverse weather event ratings when considering the solution to this Modification.

Discussion at SSC - July 2025

MP293 was discussed at SSC in respect of the “Deferral” solution option. The SEC Change team asked for feedback on the Proposed Solution, and if there were any issues or considerations that the SEC Change team were not aware of.

Members shared their feedback on the modification generally and additionally recommended that the SEC Change team review the storm severity grading to determine what qualifies as a major event.

Discussion at TABASC – July 2025

MP293 was discussed at TABASC in respect of the “Deferral” solution option. The SEC Change team asked for feedback on the proposed solution, and if there were any issues or considerations that the SEC Change team were not aware of.

Members noted that where a Planned Maintenance will deliver changes to support a planned SEC Release, a deferral of that Maintenance may impact the delivery of the associated changes. This would therefore require a careful assessment of the relative benefits of a deferral on a Maintenance-by-Maintenance basis. The DCC noted that they cannot fully categorise the impact of this scenario until they have conducted an Impact Assessment, but Members agreed that each Planned Maintenance window should be reviewed on its own merits.

It was emphasised that Unplanned Maintenance, which is typically critical, must not be deferred, and that any deferral of planned maintenance should be limited to avoid knock-on effects on subsequent schedules. Members also highlighted the need to avoid excessive cancellation of Planned Maintenance events, stressing that only severe weather events should justify deferral, and raised concerns about potential over-classification leading to repeated postponements.

Discussion at OPSG - July 2025

MP293 was discussed at OPSG in respect of the “Deferral” solution option. The SEC Change team asked for feedback on the proposed solution, and if there were any issues or considerations that the SEC Change team were not aware of.

Members emphasized the need to consider consumer impacts resulting from extended supply interruptions when the SEC Change team comes to assess the cost-benefit case for MP293. The Proposer (who was present) provided additional context on Network Party Impact. They told Members that Network Parties are seeking a codification of deferral obligations to enable challenges to DCC decisions and ensure transparent tracking of maintenance deferrals.

The DCC highlighted that deferrals are complex and can create a “domino effect” on subsequent Planned Maintenance windows. While supporting the rationale for codification, the DCC noted that flexibility is required in order to accommodate varied adverse weather scenarios. An interim, uncoded process currently allows Network Parties to request deferral within 24–48 hours of a storm, feeding into internal go/no-go decisions, but only permits a 48-hour delay. The Chair raised a question for the SEC Change team, asking how the impacts of a deferral could be assessed from a cost perspective.

Discussion at Change Sub-Committee (CSC) – November 2025

The Proposer asked the SEC Change team to revisit the prioritisation of the modification, and in addition asked for Authority Determination as the governance route. The SEC Change team provided an overview of the Modification and advised Members that the Proposer has asked the SEC Change team to increase the prioritisation from Medium to High, and to change MP293 from a Self-Governance Modification to an Authority-Determined Modification. The Proposer also gave Members an overview of the Modification, providing a rationale for the increase in prioritisation, citing enhanced consumer impact, legal & regulatory compliance impact, and impacts on operational performance.

The Proposer also provided their rationale for the change in status from Self-Governance to Authority-Determined, citing the following criteria as per SEC Section D 'Modifications Process', "the variations are likely to have a material effect on existing or future Energy Consumers".

The SEC Change team also advised Members that the Proposer has asked for the Modification to be re-classified as Ofgem Urgent. The SEC Change team informed Members that this decision falls within the authority of the SEC Panel, and that whilst the CSC cannot make this determination, they should be aware of the rationale behind the proposal.

The CSC agreed to amend the prioritisation from Medium to High and agreed a change to make this an Authority Determined Modification. The SEC Change team and the Proposer also initiated a conversation on the rationale for the change in Urgency. The Proposer told Members that MP293 meets the following Ofgem-set criteria, in their view: "A significant commercial impact on parties, consumers or other stakeholder(s)". The SEC Change team showed Members an indicative timetable, which would be submitted to Ofgem pending SEC Panel approval of Urgency status. This indicative timetable would enable an implementation in November 2026. The SEC Change team told Members they are currently in conversation with the Proposer about shortening the timetable.

The SEC Change team told Members that whilst it may be possible to truncate the proposed timetable enough to allow for an expedited implementation, that this would likely result in a significant increase in costs arising from the DCCs Impact Assessment, and also an increase in the opacity of the governance process as Consultation stages are reduced, limiting the scope for industry engagement. The DCC added that in their view, a June 2027 implementation is unrealistic. The Proposer indicated to CSC Members that it is still intention, however, to work with the SEC Change team to affect an earlier implementation in order to realise the perceived benefits of the Modification faster. Since this meeting the DCC have now confirmed via their preliminary IA that they are able to implement the DSP1 solution by November 2026.

Discussion at SSC - November 2025

Following the development of the technical "Enhanced Availability" solution, the SEC Change team returned this Modification to the SSC in order to understand if there were any security considerations in respect of the newly developed solution. SSC Members indicated that the Enhanced Availability solution as presented was unlikely to have an impact on Device Security. However, a number of scenarios were identified, where, if these scenarios were to occur, then this Modification may present a Security impact. These scenarios include unexpected failure of the Enhanced Availability solution, changes in the DCCs overall security architecture in the future that may have a retrospective impact on the solution, and whether the DCC may need to modify existing security practices in order to deliver the Proposed Solution. The SEC Change team agreed to discuss the outcome of the Impact Assessment with the SSC to determine if these scenarios are likely to be realised.

Discussion at TABASC – December 2025

TABASC Members were invited to comment on MP293's Business Requirements, ahead of a planned Preliminary Impact Assessment by the DCC. One Member, a Network Party representative, highlighted that the original business-case assessment for the DCC as a provider of services to the SEC indicated that Network Parties can expect to benefit from access to DCC Services, and that this Modification would support that assessment.

Several TABASC Members did not support applying the Proposed Solution to DSP2, as they felt that the expected system uptime of 99.95% was sufficiently high as to not warrant the Enhanced Availability service. They highlighted that applying the Proposed Solution to DSP2 would therefore likely not be cost effective.

TABASC Members indicated that in order to meet the cut-off date for implementation of new technical changes into DSP1, MP293 must progress very rapidly, and questioned whether it was possible to progress the Modification at a rate fast enough to meet the implementation deadline of November 2026.

Discussion at Working Group – December 2025

At the December 2025 WG, Members were asked to comment on the Proposed Solution and the Business Requirements ahead of a planned DCC Preliminary Impact Assessment. A WG Member challenged the premise that the benefits case relies on mitigating risks to the personal safety of Network Parties operatives who are forced to physically attend sites in an adverse weather area in the absence of the ability to communicate with Smart Meters. They also questioned the assumption that DCC services should always be available, noting that some system downtime was anticipated in the original business case. The Proposer disagreed with this view and maintained the necessity of improving availability.

The SEC Change team explained that the DCC had originally proposed including additional SRVs, such as those supporting Supplier's prepayment functions. The purpose of such an inclusion would be to broaden the benefit case by allowing another class of SEC Party (Large & Small Suppliers) to benefit from the Proposed Solution, and spread the implementation cost accordingly. However, the Proposer preferred a solution limited to SRVs benefitting Network Party. They did note, however, that this did not preclude the DCC from exploring a broader solution outside the scope of the Modification.

The SEC Change Team reminded the WG that it may propose alternative Solutions, and the DCC subsequently presented one that added two Supplier-benefitting SRVs to the scope, bringing the total to four. Supplier representatives indicated provisional support, subject to TABASC review, and several WG members endorsed exploring this alternative, noting that the Supplier-benefitting SRVs would require careful consideration during further development.

As a result, MP293 has been exploring two options inside of the Enhanced Availability (EA) solution since the December 2025 WG: EA Option 1 – Network Party Messages only, and EA Option 2 – Network Party & Supplier Messages.

Since the December 2025 WG, the DCC proposed an additional Alert for inclusion within the Supplier-benefitting subset, bringing the total number of Messages under EA Option 2 up to five.

Discussion at OPSG – February 2026

Members of the OPSG were asked to comment on the DCC's Preliminary Impact Assessment. OPSG Members noted that they would not be in favour of any of the optional additional costs to extend the functionality of the Enhanced Availability solution into SMETS1 Smart Meters due to the prohibitively high cost. Members were not in favour of extending the Proposed Solution into DSP2 for the same

reason. One OPSG Member pointed out that DSP2 is expected to have 99.95% uptime, rather than the 99.99% figure quoted in the PIA.

Members were provisionally in favour of exploring the “core” Enhanced Availability solution of changes to DSP1 only, with no additional changes to either the CSP or 4G Communication Hub functionalities, providing that the Proposer and the SEC Change Team can demonstrate that a cost-benefit test is met.

Discussion at Working Group – March 2026:

The SEC Change team provided an overview of the Modification, and the Preliminary Impact Assessment, supported by both the DCC and the Proposer, with discussion covering technical scope, security considerations, and the viability of the Proposed Solution. Members confirmed that the EA service availability could still be impacted by CSP-level outages, though mitigations may be possible by opting to expand the functionality of the Proposed Solution into the CSP. Working Group explored whether the lack of Anomaly Detection Threshold (ADT) quarantine functionality in the EA service would result in new cyber-security risks; namely, Distributed Denial of Service (DDoS) attacks. The SEC Change team and the Proposer agreed to review this further, with escalation to the SSC if required.

The DCC and the SEC Change team gave an overview of the cost breakdown of the solution and its optional “add-ons,” along with implementation timelines. A member highlighted that the TABASC are discussing increases to the frequency of Planned Maintenance in DSP1. The SEC Change team queried whether this would strengthen the cost-benefit case for MP293. Members also questioned the DCC’s anticipated 99.95% uptime for DSP2, noting this would materially affect whether EA should be implemented in DSP2.

Overall, the Working Group agreed that the Proposed Solution is technically feasible for a November 2026 implementation and that further evidence from Parties will be essential to validate the benefits case. Members were encouraged to provide detailed responses to the Refinement Consultation, particularly around expected DSP2 uptime and the value of potential “add-on” services.

Discussion at TABASC – March 2026

The SEC Change team provided an overview of the Proposed Solution, and invited feedback on whether the Proposed Solution would present risks to the SEC from a technical architecture and business architecture perspective. The DCC affirmed that the EA service is subject to the continued operation of F5 load balancers, and that, should these become non-operational, then the EA service in turn would cease to function.

A member asked whether the EA service might not have been able to have been delivered under the Elective Communications Service (ECS). The DCC replied that the ECS changes do not normally involve changes to the DSP, but agreed to take this question away to confirm. Another member queried whether the EA service will have an impact on transaction per second limits and the Service User retry buffer; the DCC offered to take these questions away.

The DCC confirmed that the “Add On” Solution options have an enduring lifecycle of their own; by applying the EA service to the CSP, for example, the functionality in the CSP would apply to both DSP1, and also, in the future, to DSP2. A question was also asked about whether, in this example, the EA service in the CSP would function when the DSP was *not* undergoing a Planned Service Disruption, i.e., the DSP is up, and the CSP is down. The DCC indicated that the EA service in the CSP would function in this case, and direct Messages to standard DSP, rather than the EA service in that instance. A member queried if, as a result of the above, multiple unique combinations of DSP and

“Add On” would need to be tested against one another in variations of “on” and “off” settings, to determine the interplay between them. The DCC confirmed that this would need to be tested.

The Proposer asked about whether the DCCs expectations for DSP2s 99.95% uptime could be substantiated. The DCC indicated that these are expectations, albeit expectations against which the DCC are highly confident, but that ultimately, they cannot be confirmed until DSP2 go-live. The Proposer indicated that this would therefore impact the perceived cost-benefit of proposed change to implement the EA service into DSP2 independently of DSP1.

8. Case for change

Business case

Approval of the modification

The EA service offers a direct and reliable way to mitigate the operational disruption experienced during Storm Daragh, by ensuring that selected SRVs and Alerts (SRV 7.4 and AD1) remain available during Planned Service Disruptions, thereby preserving critical visibility of supply status when Network Parties must respond rapidly to storm-related outages. Maintaining these Messages reduces the need for field agents to enter hazardous environments, improves restoration times for off-supply consumers, and under EA Option 2, protects vulnerable prepayment customers from losing the ability to top-up during an outage.

The solution also materially mitigates Maintenance and BCDR outages on DSP1, creating predictable operational benefits across Network Parties and Suppliers, and may deliver multi-year consumer resilience benefits. The SEC Change team also identified a risk inherent to the Deferral Proposed Solution option whereby a deferral of a DCC Planned Maintenance may impact SEC Parties, such as Suppliers, who in turn plan their own maintenance activities around the DCC’s Planned Maintenance schedule. Where a deferral occurs at the DCC level, the Supplier must defer their own activities, potentially incurring costs as a result. The EA service as a preferred Proposed Solution for MP293 would eliminate this risk for Suppliers, and prevent this Modification from being beneficial to one class of SEC Party at the expense of another.

The Refinement Consultation will return quantifiable benefits for both Suppliers and Network Parties, and will further substantiate the business case in favour for the Proposed Solution options.

Against approval of the modification

The EA service carries implementation and ongoing cost: £610k–£900k for DSP1 alone, plus approximately £25k per month to operate, while optional extensions to CSPs, SMETS1 Providers, and Device Manager may add several million pounds more, raising questions about value for money. Many industry groups have also highlighted that DSP2 is already expected to deliver extremely high availability with minimal planned outages and given that DSP1 is planned to be only in effect until mid-2028, the costs in respect of changes to DSP1 must be balanced against this finite shelf-life.

Several Service Providers have indicated they cannot guarantee continuous processing under all maintenance scenarios, meaning the EA service may not resolve all outage risks; and Sub-Committees have cautioned that the scope of the EA (particularly if limited only to Network Party SRVs) may be too narrow to justify the investment, given the limited frequency of high-impact weather/maintenance overlaps.

The proposed DCC Full Impact Assessment will return more detailed costs and will further substantiate the costs for this Modification that must be offset for a business case to be met in respect of the Enhanced Availability Proposed Solution option.

Views against the General SEC Objectives

Proposer's views

The SEC Change team consider that the Proposed Solution would support SEC Objectives (a) and (e):

(a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain; and

(e) facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy

The Proposed Solution will enable Network Parties and Suppliers to execute critical operational tasks, power restoration and provision of services to prepayment customers, respectively, during DCC Planned Service Disruptions. The EA service is a novel product with options for enduring benefit to different areas of the DCC's Smart Metering infrastructure. In this way, the EA service is expected to positive benefit the above Objectives.

Further views on this area will be garnered from the Proposer during the Refinement Consultation.

Industry views

This section will be completed following the closure of the Refinement Consultation.

Views against the consumer areas

Improved safety and reliability

This Modification will allow for consumers to have their power restored faster in a small number of scenarios where they have lost supply due to adverse weather, when there is an overlap between that adverse weather and a DCC Planned Maintenance. This benefit will be felt by merit of more efficient supply restoration activities by Network Parties in that scenario.

Additionally, Network Parties themselves will experience an improvement in safety during these incidents, as being able to communicate with Smart Meters during an adverse weather event, where they previously would not have been able to without the benefits of either Proposed Solution option, will mitigate the need to send agents into the field. This means fewer agents will be required to travel to areas affected by adverse weather than they might otherwise have had to, resulting in better safety outcomes for those individuals.

Additionally, the Enhanced Availability Solution option 2 will allow for consumers with Smart Meters on prepayment mode to continue to top up during a DCC System outage. Proportionally more consumers with Smart Meters on prepayment mode are classified as vulnerable relative to those with Smart Meters on credit mode. As a result, the mitigation of top-up cancellations as a result of the Proposed Solution will ensure these consumers stay on-supply where they might otherwise have gone off-supply by way of not being able to top-up.

Lower bills than would otherwise be the case

This Modification has no effect on consumer bills.

Reduced environmental damage

This Modification has no effect on environmental damage.

Improved quality of service

The Enhanced Availability solution would maintain the ability for prepayment consumers to top-up during DCC system outages, preventing unnecessary loss of supply and ensuring continuity of essential services for a group that is disproportionately vulnerable. By keeping key prepayment SRVs and Alerts available, the Proposed Solution reduces failed top-ups and improves overall service reliability for consumers who rely on timely credit transfers to remain on supply.

Benefits for society as a whole

This Modification has a neutral effect on societal benefit.

Final conclusions

This section will be completed following the closure of the Refinement Consultation.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	9 June 2025
Presented to CSC for initial comment	17 June 2025
Converted to Modification Proposal	17 June 2025
Presented to TABASC	3 July 2025
Presented to SSC	9 July 2025
Presented to OPSG	28 July 2025
Requirement Workshop SECAS, Proposer, DCC and Service Providers	24 November 2025
Presented to TABASC/Working Group/OPSG/SSC for feedback	26 November 2025 – 9 December 2025
DCC Preliminary Assessment	5 January 2026 – 6 February 2026
<i>Working Group Discussion</i>	<i>4 March 2026</i>
<i>Refinement Consultation and Sub-Committee feedback</i>	<i>6 March 2026 – 27 March 2026</i>
<i>Working Group Discussion</i>	<i>1 April 2026</i>
<i>Request Impact Assessment at Change Board*</i>	<i>22 April 2026</i>
<i>DCC Impact Assessment</i>	<i>22 April 2026 - 17 June 2026</i>
<i>Working Group Discussion</i>	<i>1 July 2026</i>
<i>Sub-Committee feedback</i>	<i>1 July 2026 – 20 July 2026</i>
<i>CSC agree to progress to Report Phase</i>	<i>21 July 2026</i>
<i>Modification Report Consultation</i>	<i>21 July 2026 - 12 August 2026</i>
<i>Change Board final vote</i>	<i>26 August 2026</i>
<i>Authority Determination</i>	<i>26 August 2026 – TBD</i>

Italics denote planned events that could be subject to change

**The SEC Change Team are exploring the possibility of an ad-hoc Change Board to expedite the governance process – Steps beyond this stage may be subject to change depending on if this takes place.*

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
BCDR	Business Continuity & Disaster Recovery
CSC	Change Sub-Committee
CSP	Communications Service Provider
DCC	Data Communications Company
DCO	Data Communications Operator
DSP	Data Service Provider
EA	Enhanced Availability
ECS	Elective Communications Service
FOC	Final Operating Cohort
GSP	Grid Supply Point
IOC	Initial Operating Cohort
Met Office	Meteorological Office
MOD	Middle Operating Cohort
OPR	Operational Performance Regime
OPSG	Operations Group
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SMETS1	Smart Metering Equipment Technical Specifications 1
SMETS2	Smart Metering Equipment Technical Specifications 2
SMS	Smart Metering System
SP ENW	Scottish Power Electricity North West
SRV	Service Reference Variant
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee