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MP293 ‘Deferment of DCC Planned Maintenance during Adverse Weather’

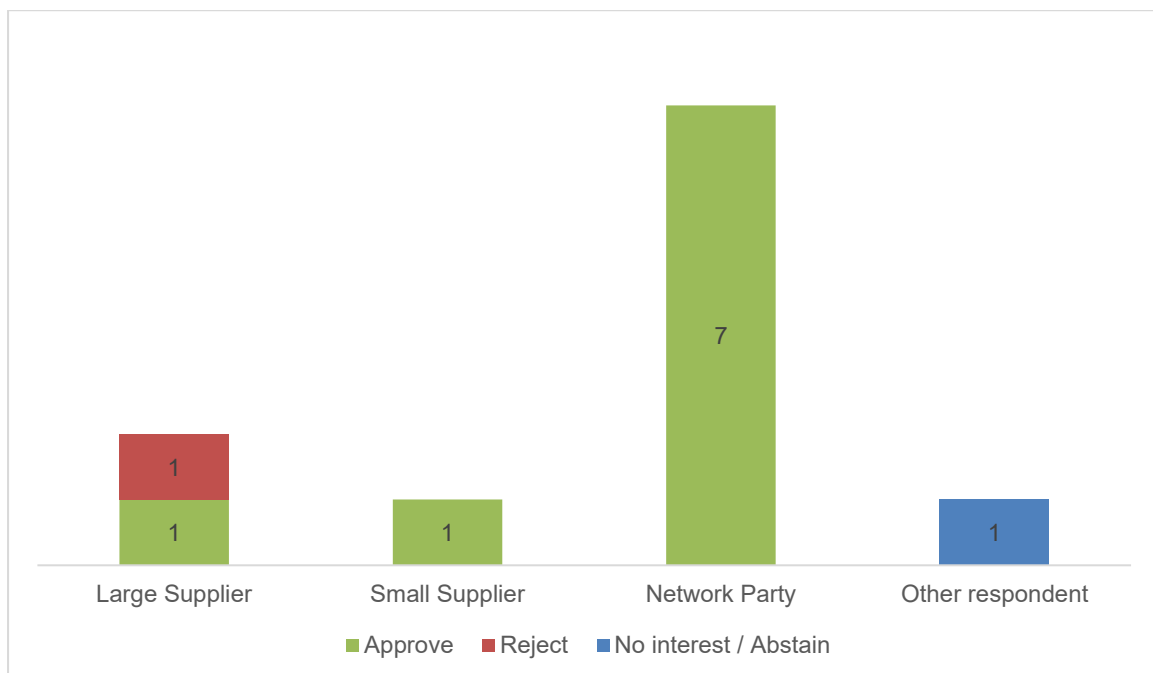
Annex D

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP293 Refinement Consultation.

Summary of responses



Refinement Consultation

SECAS received 11 responses to the Refinement Consultation. 9 believed that the modification should be approved. They considered the modification better facilitated SEC Objectives (a)¹, (b)², (c)³, and (e)⁴.

¹ facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

² enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence.

³ facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.

⁴ 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.

Question 1: Do you agree that the solutions put forward will effectively resolve the identified issue? Please provide your rationale, including which solution option you believe will most effectively resolve the issue – “Must”, or “Must & Should”.

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
SP Electricity North West	Network Party	Yes	As the proposer of the modification, we support the “Must” solution and determine it should improve the identified Network Operator power outage management issues in the original problem statement for the As is DSP (DSP 1). Whilst not a direct beneficiary, we also agree and are supportive of the “Should” solution which should resolve the identified additional Supplier prepayment top up management issues in the alternative modification raised by the SEC Working Group. As there is no impact on the implementation for the “must” solution and minimal increase in costs for providing the “should” additionality we would agree the “Must & Should” solution which would enable DCC users (Network operators and Suppliers) to continue to continue to use the DCC for power outage and prepayment top up management during DCC planned outages – which will positively benefit, impact and enable continued targeted support for customers who require extra care during adverse weather. As the proposer we do request the following:	Thank you – This will be taken under advisement as the Modification is assessed.

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
			• The DCC Full IA provide: ○ the costs of more SRs and Alerts to be included (e.g. 8F36). ○ the confidence levels in a low likelihood of CSP and DSP being unavailable to DCC users. How often is CSP unavailable? How often is CSP and DSP in parallel unavailable? ○ the confidence levels in a high likelihood of only a total of 4 hours outage (including BCDR testing) during DSP2 ○ clarity on the CSP N add on – what is meant by ‘continue to be sent’. AD1 alerts are ‘last gasp’ sent from the Comms Hub (CH) when it loses power and this is existing functionality; we are unclear what is being proposed. ○ recommendation of what the requirements parameters should be for our proposed revisions to H3.29 (refer to our response to Q2) • the legal text is amended to further strengthen the solution (refer to our response to 2) • SECAS start early preparatory discussions with Ofgem regarding prioritisation of a speedy approval due to the impact on customers and time critical nature of the implementation date	

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
			being unmovable. We are happy to support any bilateral if required. Clarification of why the core changes must be delivered by 6 November 2026 and no later implementation is possible, and this business rationale is provided to Ofgem to aide with their Authority approval. Refer to our response to Q10 for detailed comments on the add-ons and DSP2 considerations.	
National Grid Electricity Distribution	Network Party	Yes	We are in full support of the ‘Must’ solution and agree that it would significantly improve the power outage management issues for Network Operators that are presented within the original problem statement. We also fully support the ‘Should’ solution, despite Network Operators not benefitting from it directly. The additional cost for the further functionality is minimal, yet it would allow Suppliers to continue making use of the DCC Network for managing prepayment top ups during a planned outage, which was a supplementary issue raised by the SEC Working Group in relation to this modification. This enhancement to the solution ultimately seeks to benefit and protect consumers during periods of adverse weather, ensuring that the ability to top up their credit meter is not restricted at times which may be particularly stressful. Therefore, for the reasons stated above, we feel	Thank you – This will be taken under advisement as the Modification is assessed.

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
			that the 'Must and Should' solution would be the most practical option to consider for implementation. In addition, we are entirely supportive of the proposer's request for the following: • The DCC Full IA to provide: ○ the costs of more SRs and Alerts to be included (e.g., N13 and 0x8F36) ○ the confidence levels in a low likelihood of CSP and DSP being unavailable to DCC users. How often is CSP unavailable? How often is CSP and DSP in parallel unavailable? ○ the confidence levels in a high likelihood of only a total of 4 hours outage (including BCDR testing) during DSP2 ○ clarity on the CSP N add on – what is meant by 'continue to be sent'. AD1 alerts are 'last gasp' sent from the Comms Hub (CH) when it loses power and this is existing functionality; we are unclear what is being proposed. ○ recommendation of what the requirements parameters should be for	

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
			our proposed revisions to H3.29 (refer to our response to Q2) - The legal text to be amended to further strengthen the solution (refer to our response to 2) - SECAS to start early preparatory discussions with Ofgem regarding the prioritisation of a speedy approval due to the impact on customers and time critical nature of the implementation date being unmovable. - Clarification of why the core changes must be delivered by 6 November 2026 and no later implementation is possible, and that this business rationale is provided to Ofgem to aide with their Authority approval. In our response to Q10, we have provided further detail on our thoughts regarding the add-ons and our DSP2 considerations.	
EON Next	Large Supplier	Yes	When the DSP undergoes maintenance, the solution provides an alternative bypass for certain SRs and alerts (assuming the F5 Load balancers and network are not affected by the planned maintenance).	Thank you – This will be taken under advisement as the Modification is assessed.

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
British Gas	Large Supplier	Yes	<u>Overall approach:</u> We prefer the Enhanced Availability approach instead of requiring DCC planned maintenance to be postponed. <u>Core Solution(s):</u> If the modification is implemented, we would like it to be as Core Solution – Option 2 (£680-900k). We assume there is a business case for the DNO elements in the Core Solution. Assuming this is the case, we would like the Pre Payment elements to also be included at the extra £70-80k. The £25k/month also seems significant (£300k/year) – could we get more information on this. Would it apply for all options/scenarios? <u>Optional Add-Ons</u> We are less clear on the business case for the Option Add-Ons, and would want to see more analysis carried out on these if they were to be considered. In particular, we don't expect the SMETS1 elements to be beneficial, given the timeframe. <u>DSP2</u> We believe there needs to be a separate discussion about DSP2. Will the down-time really be as low as is forecast (4 hours per year)? Why is the implementation cost for DSP2 (at £2-3m) so much higher than the DSP1	Thank you – This will be taken under advisement as the Modification is assessed.

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
			implementation costs (at £610-820k or £680-900k). Would it not be possible for some of what is developed for DSP1 to be carried forward into DSP2?	
BUUK	Network Party	Yes	We support the “ <i>Must</i> ” and “ <i>Should</i> ” solutions, which will improve the Network Operator power outage management issues identified in the As-Is DSP (DSP 1). This also resolves additional Supplier prepayment top-up issues with minimal extra cost and no impact on the “ <i>Must</i> ” implementation. Adopting the combined “ <i>Must & Should</i> ” solution will allow Network Operators and Suppliers to continue using the DCC for outage and prepayment top-up management during planned outages, ensuring ongoing support for customers needing extra care during adverse weather.	Thank you – This will be taken under advisement as the Modification is assessed.
Northern Powergrid	Network Party	Yes	Northern Powergrid fully supports the implementation of the ‘ <i>Must</i> ’ solution, as outlined in the modification, as the minimum required approach, as it will enhance network operators’ resilience during high-impact weather events. Northern Powergrid also supports the implementation of the ‘ <i>Should</i> ’ solution, notwithstanding that network operators are not the primary beneficiaries of the enhanced functionality. We recognise that the capability for suppliers to utilise the DCC network during planned outages (for example to enable prepayment meter top-ups) provides wider market benefits. Furthermore, we	Thank you – This will be taken under advisement as the Modification is assessed.

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
			consider that this functionality can be delivered at a minimal additional cost and therefore represents a proportionate and justified enhancement to the existing solution. On this basis Northern Powergrid believes that adopting the combined “Must and Should” solution represents the most practical and effective option for implementation.	
DCC	DCC	[None Given]	-	-
E	Small Supplier	Yes	I consider Solution 2 (“Must & Should”) to be the most effective option, provided the EA service can replicate the 2.2 CV2 process for SMETS1 devices—specifically, that an N56 can be generated upon receipt of the S1UT alert from the S1SP and returned to supplier. Solution 2 not only addresses the core issue of network operators losing visibility during storm events that coincide with DCC maintenance, but it also delivers wider customer benefits. Enabling the use of command variant 2.2 during maintenance windows supports prepayment customers by allowing top-ups when DCC services are unavailable. Currently, if a supply disconnects due to exhausted credit and a top-up cannot be sent, consumers must wait for DCC availability or require a meter exchange. This solution would reduce unnecessary	Thank you – This will be taken under advisement as the Modification is assessed.

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
			engineer visits and significantly improve the prepayment customer journey. Conservative estimate 2million SMETS1 enrolled meters unable to process a top up during an unplanned/planned outage. Smets 2 impact consumers wouldn't be able to receive a UTRN automatically.	
UK Power Networks	Network Party	Yes	UK Power Networks supports the “Must & Should” Enhanced Availability solution (EA Option 2). We agree that the “must” components will resolve the identified Network Operator issues related to power-outage management during Planned Service Disruptions on the ‘As Is DSP’ (DSP1). While we are not the primary beneficiaries of the “should” elements, we are supportive of their inclusion, as they address the additional Supplier prepayment top-up functionality gaps highlighted by the SEC Working Group. As the “should” elements introduce only minimal additional costs and we do not expect it to materially affect the feasibility of delivering the “must” functionality, we consider the combined “Must & Should” option to offer a proportionate and efficient enhancement. It will enable both Network Operators and Suppliers to maintain critical outage-related and prepayment-related activities during DCC Planned Maintenance, ensuring continued support	Thank you – This will be taken under advisement as the Modification is assessed.

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
			for customers – including those requiring extra care – during adverse weather and storm events.	
Scottish Power Energy Network	Network Party	Yes	SPEN supports both the 'Must' and 'Must & Should' DSP1 Core Solutions. We believe the 'Must' solution would meaningfully improve Network Operators' ability to manage power outages, directly addressing the issues identified in the original problem statement. We also fully support the 'Should' solution. While it does not provide a direct benefit to Network Operators, it introduces only a minimal increase in cost and would deliver a positive outcome for pre-payment customers. This aspect was raised as a supplementary issue by the SEC Working Group in connection with this modification. In addition, we are entirely supportive of the proposer's request for the following: • The DCC Full IA to provide: • the costs of more SRs and Alerts to be included (e.g., N13 and 0x8F36). • the confidence levels in a low likelihood of CSP and DSP being unavailable to DCC users. How often is CSP unavailable?	Thank you – This will be taken under advisement as the Modification is assessed.

			How often is CSP and DSP in parallel unavailable? - the confidence levels in a high likelihood of only a total of 4 hours outage (including BCDR testing) during DSP2 - clarity on the CSP N add on – what is meant by ‘continue to be sent’. AD1 alerts are ‘last gasp’ sent from the Comms Hub (CH) when it loses power and this is existing functionality; we are unclear what is being proposed. - recommendation of what the requirements parameters should be for our proposed revisions to H3.29 (refer to our response to Q2) - The legal text to be amended to further strengthen the solution (refer to our response to 2) - SECAS to start early preparatory discussions with Ofgem regarding the prioritisation of a speedy approval due to the impact on customers and time critical nature of the implementation date being unmovable. - Clarification of why the core changes must be delivered by 6th November 2026 and no later implementation is possible, and that this	
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Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
			business rationale is provided to Ofgem to aide with their Authority approval. Please refer to Q10 for detailed comments on the add ons and DSP2 considerations.	
Scottish & Southern Electricity Network	Network Party	Yes	SSEN support the “Must” solution. This solution will address the issues identified within the current DSP1 arrangements relating to power-outage processes for Network Operators, and its delivery would represent a clear improvement on today’s operational challenges. SSEN also support the inclusion of the “Should” element. The additional capability would allow Suppliers to maintain prepayment top-up services when the DCC is undergoing planned downtime, responding to the further issues highlighted. Given that the uplift in cost appears marginal and the benefit to consumers, particularly vulnerable customers who may be more affected during adverse weather. For these reasons SSEN support the combined “Must” and “Should” solution to progress, ensuring both outage-handling and prepayment functionalities remain available to DCC users during planned DCC outages. Alongside this proposal SSEN support the following Items requested for inclusion in the DCC Full Impact Assessment:	Thank you – This will be taken under advisement as the Modification is assessed.

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
			- A breakdown of costs associated with incorporating additional Service Requests and Alerts (for example, the 0x8F36 Alert). - the confidence levels in a low likelihood of CSP and DSP being unavailable to DCC users. How often is CSP unavailable? How often is CSP and DSP in parallel unavailable? - the confidence levels in a high likelihood of only a total of 4 hours outage (including BCDR testing) during DSP2 - clarity on the CSP N add on – what is meant by ‘continue to be sent’. AD1 alerts are ‘last gasp’ sent from the Comms Hub (CH) when it loses power and this is existing functionality; we are unclear what is being proposed. - recommendation of what the requirements parameters should be for our proposed revisions to H3.29 (refer to our response to Q2) - the legal text is amended to further strengthen the solution (refer to our response to 2) - SECAS start early preparatory discussions with Ofgem regarding prioritisation of a speedy approval due to the impact on customers and time critical nature of the implementation date	

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
			being unmovable. We are happy to support any bilateral if required. Clarification of why the core changes must be delivered by 6 November 2026 and no later implementation is possible, and this business rationale is provided to Ofgem to aide with their Authority approval. More detail on our views relating to optional add-ons and DSP2 aspects is set out in our response to Question 10.	

Question 2: Do you agree that the legal text will deliver MP293?

Question 2						
Respondent	Category	Response	Rationale	SEC Change Team Response		
SP Electricity North West	Network Party	Yes	As the Proposer, due to new information becoming available we request the additional changes to the legal text for times when a DCC planned outage will impact power outages - the DCC is required to set out in any relevant consultations if the planned DCC outage (referred to as a Planned Service Disruption in the legal text) will impact power outages (for Network Operators). - the DCC is required to make best endeavours to avoid winter. The Met Office define a meteorological winter as being from 1 December – February 28 (February 29 if a leap year). We recommend this definition is set within the SEC to enable DCC users to plan Our proposed revisions to the legal text for 1) & 2): <i>H3.XX: Regarding Planned Service Disruptions affecting the Enhanced Availability Service, the DCC:</i> <i>shall set out the impact to the Enhanced Availability Service in any consultation or plans; and</i> <i>shall not schedule any such disruption during Winter, unless scenarios occur that require Planned Service Disruptions to be completed during Winter (such as security vulnerability).</i> With an accompanying new definition of winter <table border="1"><tr><td><i>Winter</i></td><td><i>Means the period from 1 December – February 28 (February 29 if a leap year).</i></td></tr></table> - Clause H3.29 is strengthened to clarify DCC requirements during incidents.	<i>Winter</i>	<i>Means the period from 1 December – February 28 (February 29 if a leap year).</i>	Thank you – This will be taken under advisement as the Modification is assessed.
<i>Winter</i>	<i>Means the period from 1 December – February 28 (February 29 if a leap year).</i>					

Question 2				
Respondent	Category	Response	Rationale	SEC Change Team Response
			Our proposed revisions to the legal text for 3): <i>H3.29 The DCC shall take all reasonable steps to provide and maintain the Reduced Availability Service for the purpose of end-to-end communications between Users and Communication Hubs (in both directions) during:</i> a. <i>all Planned Service Disruptions; and</i> b. <i>in the event of Category 1 or Category 2 Incidents being raised which impact the availability of the DCC User Interface and in the reasonable opinion of the DCC are likely to take more than 'X' minutes to resolve. The Enhanced Availability Service shall be available within 'Y' minutes of the Target Initial Response Time for the incident.</i> The determination of X and Y would form part of the DCC's Full IA. 4. Typo in definition of Planned Service Disruption replace 'meane' with 'means'	
National Grid Electricity Distribution	Network Party	Yes	We are fully supportive of the proposer's request for additional amendments to the legal text due to new information becoming available. These additional changes are suggested below. During periods when a DCC planned outage will impact power outages: - the DCC is required to set out in any relevant consultations if the planned DCC outage (referred to as a Planned Service Disruption in the legal text) will impact power outages (for Network Operators). - the DCC is required to make best endeavours to avoid winter. The Met Office define a meteorological winter as being from 1 December –	Thank you – This will be taken under advisement as the Modification is assessed.

Question 2						
Respondent	Category	Response	Rationale	SEC Change Team Response		
			February 28 (February 29 if a leap year). We recommend this definition is set within the SEC to enable DCC users to plan Our proposed revisions to the legal text for 1) & 2): H3.XX: Regarding Planned Service Disruptions affecting the Enhanced Availability Service, the DCC: a. shall set out the impact to the Enhanced Availability Service in any consultation or plans; and b. shall not schedule any such disruption during Winter, unless scenarios occur that require Planned Service Disruptions to be completed during Winter (such as security vulnerability). With an accompanying new definition of winter <table><tr><td>Winter</td><td>Means the period from 1 December – February 28 (February 29 if a leap year).</td></tr></table> 3. Clause H3.29 is strengthened to clarify DCC requirements during incidents. Our proposed revisions to the legal text for 3): H3.29 The DCC shall take all reasonable steps to provide and maintain the Reduced Availability Service for the purpose of end-to-end communications between Users and Communication Hubs (in both directions) during: (a) all Planned Service Disruptions; and (b) in the event of Category 1 or Category 2 Incidents being raised which	Winter	Means the period from 1 December – February 28 (February 29 if a leap year).	
Winter	Means the period from 1 December – February 28 (February 29 if a leap year).					

Question 2				
Respondent	Category	Response	Rationale	SEC Change Team Response
			impact the availability of the DCC User Interface and in the reasonable opinion of the DCC are likely to take more than 'X' minutes to resolve. The Enhanced Availability Service shall be available within 'Y' minutes of the Target Initial Response Time for the incident. The determination of X and Y would form part of the DCC's Full IA. 4. Typo in definition of Planned Service Disruption replace 'meane' with 'means'	
EON Next	Large Supplier	Yes	N/A	-
British Gas	Large Supplier	-	Not reviewed.	-
BUUK	Network Party	Yes	-	-
Northern Powergrid	Network Party	Yes, based on the assumption that the legal text only relates to the Enhanced	Please see our comments on the attached marked up version of the legal text.  51488BCA.pdf	Thank you – This will be taken under advisement as the Modification is assessed.

Question 2				
Respondent	Category	Response	Rationale	SEC Change Team Response
		Availability Service		
DCC	DCC	-	We consider that there are areas for clarification in the legal text which should be considered before implementation. Some of these areas are required to ensure the service to be provided aligns to the legal text and so are important in terms of DCC compliance. Further consideration needs to be made once the final solution decided on by industry is determined, and those decisions will need to be made clear in the legal text. For example, whether this requirement is to be provided for As Is (DSP1) and Future DSP (DSP2), or just the DSP1 – CSP options will also need to be reflected. The decisions made in the solution will need to be reflected in the legal text. We would also recommend the consideration of an expiry of the Enhances Availability Service on As Is DSP and its inclusion in the legal text. In the definition of “<i>Planned Service Disruption</i>” there is a typo in the word “means”. We consider clarity would be provided by re-working the first line and suggest “<i>means events in which all or any part of the DCC Total System...</i>” We also consider that the definition name does not need to include the word “Planned” and removing this word will provide clarity – in part because the definition includes “Unplanned Maintenance”. We also would propose adding a point (d) to include incidents, which are themselves unplanned. We suggest linking the definition of “<i>Enhanced Availability Service</i>” to the definition of “<i>Planned Service Disruption</i>” and propose exchanging “<i>during periods of unavailability of the DCC Total System</i>” with “<i>during periods of [Planned] Service</i>”	Once the DCC’s Full Impact Assessment is available, the SEC Change team and the Proposer will engage with the DCC to undertake a second review of the proposed legal text.

Question 2				
Respondent	Category	Response	Rationale	SEC Change Team Response
			<i>Disruption</i>". We also propose that the reference to section H should cover the entirety of the new section describing the service, e.g. <i>"in accordance with Sections H3.29 to H3.36"</i>. The text provided in H3.30 limits any amendment to the service without completion of a SEC Modification. To allow future flexibility, for any as yet unknown scenarios, we propose that the wording should be modified to require the SRVs and Alerts as a minimum, rather than a maximum. It is also important that this obligation reference the <i>responses</i> to SRVs. We propose that this be amended as below - <i>"The Enhanced Availability Service shall maintain and provide as a minimum the following Service Reference Variants their responses and Alerts"</i>. Or this configuration could be kept in an external, code required, document, with an indication that the configuration of SRVs and Alerts could be updated following a DCC-led consultation with approval by SEC Panel. Please be assured that DCC is not recommending that any additional SRVs or Alerts be added at this time, nor are we planning any change to the requested set of services, we consider that this change will allow us to better react to unforeseen issues that may arise in the future. On H3.31 we do not consider there to be any need to define how out of scope SRVs or Alerts will be managed during periods of Planned Disruption as this processing exists today. The current wording is technically inaccurate since the Enhanced Availability Service will not process any SRVs or Alerts that are not in scope – those Alerts and SRVs will not reach the new service. If a similar obligation is maintained it should limit such rejections to the time of outage where the Enhanced Availability Service is functioning.	

Question 2				
Respondent	Category	Response	Rationale	SEC Change Team Response
			We understand that H3.32 is intended to ensure that at the implementation of the new Service, and its continued use in the future, will not require any change to DCC User systems, and that Parties will not need to switch between systems during periods of Planned Disruption. However, DCC are concerned that the current drafting may result in unintended consequences in the future. For example, there may be future changes to DCC Total System which will require User change, but the current wording would not allow those change to apply to the Enhanced Availability Service, which would then result in a conflict with the second half of the paragraph. We would recommend clarification of this obligation and propose “<i>DCC shall provide the Enhanced Availability Service in such a manner that Parties can utilise the service as they would when they utilise the DCC Total System when the Enhanced Availability Service is not required</i>” or similar. We do not consider that H3.33 is required. Availability targets for DCC systems are contained in Code Performance Measures, and a Performance Measure change may be more appropriate. Other requirements are covered in other SEC sections, SEC-Appendix-AD-DCC-User-Interface-Specification-DUIS and SEC-Appendix-E-DCC-User-Interface-Services-Schedule. We recognise that both H3.36 and H8.3A are proposed for “the avoidance of doubt”, but we do not consider them to be required and add unneeded complexity, particularly for the inclusion of the proposed text for H8.3A in that particular line of the SEC.	
E	Small Supplier	Yes	I believe the intent within the legal document does aim to meet the objectives of MP293. (However, clarity required that the technical solution would deliver the legal text. Specifically, that SMETS1 UTRNs will be returned see answers in Q1)	Thank you – This will be taken under advisement as

Question 2				
Respondent	Category	Response	Rationale	SEC Change Team Response
				the Modification is assessed.
UK Power Networks	Network Party	Yes	UK Power Networks agrees that the legal text will deliver MP293 but note that the following additions would materially strengthen the clarity and operability of the provisions: That the DCC is required to make every effort to avoid planned maintenance that includes an outage in Winter. The Met Office define a meteorological winter as being from 1 December – February 28 (February 29 if a leap year). We recommend this requirement and definition below are set within the SEC to enable DCC users to plan accordingly. Our proposed revisions to the legal text for 1) & 2): H3.XX: Regarding Planned Service Disruptions affecting the Enhanced Availability Service, the DCC: • Shall set out the impact to the Enhanced Availability Service in any consultation or plans; and • Shall not schedule any such disruption during Winter, unless scenarios occur that require Planned Service Disruptions to be completed during Winter (such as security vulnerability). With an accompanying new definition of Winter: Winter: Means the period from 1 December – February 28 (February 29 if a leap year).	Thank you – This will be taken under advisement as the Modification is assessed.

Question 2				
Respondent	Category	Response	Rationale	SEC Change Team Response
			Note also there is a typographical error in definition of Planned Service Disruption replace 'meane' with 'means'	
Scottish Power Energy Network	Network Party	Yes	We are fully supportive of the proposer's request for additional amendments to the legal text due to new information becoming available. These additional changes are suggested below. During periods when a DCC planned outage will impact power outages: 1. the DCC is required to set out in any relevant consultations if the planned DCC outage (referred to as a Planned Service Disruption in the legal text) will impact power outages (for Network Operators). 2. the DCC is required to make best endeavours to avoid winter. The Met Office define a meteorological winter as being from 1 December – February 28 (February 29 if a leap year). We recommend this definition is set within the SEC to enable DCC users to plan. Our proposed revisions to the legal text for 1) & 2): <i>H3.XX: Regarding Planned Service Disruptions affecting the Enhanced Availability Service, the DCC:</i> <i>a. shall set out the impact to the Enhanced Availability Service in any consultation or plans; and</i> <i>b. shall not schedule any such disruption during Winter, unless scenarios occur that require Planned Service Disruptions to be completed during Winter (such as security vulnerability).</i>	Thank you – This will be taken under advisement as the Modification is assessed.

Question 2						
Respondent	Category	Response	Rationale	SEC Change Team Response		
			With an accompanying new definition of winter <table><tr><td><i>Winter</i></td><td><i>Means the period from 1 December – February 28 (February 29 if a leap year).</i></td></tr></table> 3. Clause H3.29 is strengthened to clarify DCC requirements during incidents. Our proposed revisions to the legal text for 3): <i>H3.29 The DCC shall take all reasonable steps to provide and maintain the Reduced Availability Service for the purpose of end-to-end communications between Users and Communication Hubs (in both directions) during:</i> <i>(a) all Planned Service Disruptions; and</i> <i>(b) in the event of Category 1 or Category 2 Incidents being raised which impact the availability of the DCC User Interface and in the reasonable opinion of the DCC are likely to take more than ‘X’ minutes to resolve. The Enhanced Availability Service shall be available within ‘Y’ minutes of the Target Initial Response Time for the incident.</i> The determination of X and Y would form part of the DCC’s Full IA. 4. Typo in definition of Planned Service Disruption replace ‘meane’ with ‘means’	<i>Winter</i>	<i>Means the period from 1 December – February 28 (February 29 if a leap year).</i>	
<i>Winter</i>	<i>Means the period from 1 December – February 28 (February 29 if a leap year).</i>					

Question 2				
Respondent	Category	Response	Rationale	SEC Change Team Response
Scottish & Southern Electricity Network	Network Party	Yes	SSEN believe the legal text will deliver the proposed modification outcomes.	Thank you.

Question 3: Do you agree with the proposed implementation approach?

Question 3				
Respondent	Category	Response	Rationale	SEC Change Team Response
SP Electricity North West	Network Party	Yes	We agree with the implementation date for the “Must & Should” solution for the As is DSP (DSP1) of 6 November 2026. We recommend SECAS begin early discussions with Ofgem regarding prioritisation of a speedy approval due to the impact on customers and time critical nature of the implementation date being unmovable. The DCC would need to provide the business rationale for the cut off date of 6 November 2026. Once the DCC confirms the confidence levels for the SMETS2 add ons and DSP2 changes as part of its Full IA, the outcome could require a staggered implementation date for those additional elements which could form a solution for a separate modification.	Thank you – This will be taken under advisement as the Modification is assessed.
National Grid Electricity Distribution	Network Party	Yes	We agree with the proposed implementation date of 6th November 2026. We feel it would be beneficial for SECAS to initiate early dialogue with Ofgem, with a view to requesting that the approval of this modification is prioritised given the time critical nature and the level of impact on industry parties and consumers.	Thank you – This will be taken under advisement as the Modification is assessed.

Question 3				
Respondent	Category	Response	Rationale	SEC Change Team Response
			Should adoption of the proposed 'add-ons' and DSP 2 changes require a staggered implementation timeline, these aspects could be treated as a separate modification.	
EON Next	Large Supplier	Yes	N/A	-
British Gas	Large Supplier	-	See above – we would want Core Solution Option 2.	Thank you.
BUUK	Network Party	Yes	We agree with the implementation date of 6 th November 2026.	Thank you.
Northern Powergrid	Network Party	Yes	Northern Powergrid agrees with the proposed implementation date (06/11/2026). We also feel it would be prudent for this modification to be prioritised given the time-sensitive nature of this modification.	Thank you.
DCC	DCC	[None Given]	-	-
E	Small Supplier	Yes	Delivery of this SEC mod for November's release would provide benefits for consumers as it provides extra stability for seasonal increase of demand for winter 26/27.	Thank you.
UK Power Networks	Network Party	Yes	UK Power Networks agrees with the proposed implementation date of 6 November 2026 for delivering the "Must & Should" Enhanced Availability solution into DSP1. Given that the DCC has indicated this date is fixed and that no later implementation is feasible, we support	Thank you – This will be taken under advisement as the Modification is assessed.

Question 3				
Respondent	Category	Response	Rationale	SEC Change Team Response
			efforts to ensure the necessary approvals are secured in time. We encourage SECAS to engage early with Ofgem to support an expedited approval, recognising both the consumer impact associated with adverse-weather outage events and the time-critical nature of the DSP1 delivery window. We also consider it important that the DCC clearly sets out the business rationale and constraints underpinning the 6 November 2026 cut-off date. Once the DCC's Full Impact Assessment provides clarity on confidence levels, feasibility and lead-times for the optional SMETS2 Communication Service Provider (CSP) add-on and DSP2 elements, they should be revisited to analyse whether a further implementation is warranted. In summary, the "Must & Should" needs to be implemented on or before 6 November 2026, but the add-ons the SMETs CSP and DSP2 elements are not critical and can only be added after, they are multi failure resilience add-ons and in readiness for DSP2 (which comes in two-years time).	
Scottish Power Energy Network	Network Party	Yes	We agree with the implementation date of 6 November 2026 for the " Must & Should " solution for the DSP1 Core.	Thank you – This will be taken under advisement as the Modification is assessed.

Question 3				
Respondent	Category	Response	Rationale	SEC Change Team Response
			We believe it would be beneficial for SECAS to begin early engagement with Ofgem, with the intention of requesting that approval of this modification be prioritised, given its time-critical nature and the significant impact on industry parties and consumers. If the proposed add-ons and DSP2 changes require a staggered implementation timeline, these elements could be progressed as a separate modification.	
Scottish & Southern Electricity Network	Network Party	Yes	SSEN support the proposed implementation date of 6 November 2026 for delivering the combined “Must & Should” solution under DSP1. Given the fixed timeline and the potential impact on customers, it would be sensible for SECAS to open discussions with Ofgem early so that the approval process can be handled promptly. The DCC will also need to clearly set out the reasoning behind 6 November 2026 being the latest viable delivery date. Once the DCC provides confidence levels for the SMETS2 add-ons and DSP2 elements in its Full Impact Assessment, it may become clear that these features require a different proposed implementation approach.	Thank you – This will be taken under advisement as the Modification is assessed.

Question 4: Will there be any impact on your organisation to implement MP293?

Question 4				
Respondent	Category	Response	Rationale	SEC Change Team Response
SP Electricity North West	Network Party	No	There will be no system impact to SP ENW implementation MP293 There will be a positive process impact as SP ENW will no longer be required to request a DCC deferment of the DCC Planned Outages when required and as such will no longer require an internal DNO requesting a deferment process.	Thank you.
National Grid Electricity Distribution	Network Party	No	We do not foresee any impact on the systems and/or operational processes within our organisation. That said, positive impacts would be felt by the ability to continue to operate efficiently and proactively during periods of clashes between DCC outages and power outages caused by adverse weather events.	Thank you.
EON Next	Large Supplier	No	Other than awareness, I can't see any implementation costs for Suppliers (just in the DCC charges)	Thank you.
British Gas	Large Supplier	No	-	-
BUUK	Network Party	No	-	-
Northern Powergrid	Network Party	No	Northern Powergrid does not foresee any negative implications for our organisation should any iteration of this modification be implemented. On the contrary, we anticipate that the modification will facilitate greater	Thank you.

Question 4				
Respondent	Category	Response	Rationale	SEC Change Team Response
			operational efficiencies during periods where adverse weather events coincide with DCC outages.	
DCC	DCC	[None Given]	-	-
E	Small Supplier	Yes	A positive impact expected due to an improvement to prepay customers journey due to the ability to process top ups during planned outages which usually average of once a month. May also reduce the risk of emergency meter replacements triggered by top up issues.	Thank you.
UK Power Networks	Network Party	No	There will be no system impact to UK Power Networks to implement MP293. UK Power Networks' customers will benefit from the proposed solution.	Thank you.
Scottish Power Energy Network	Network Party	No	This modification will have no system impact on SPEN . The positive impacts will be realised through an improved ability to operate efficiently and proactively during periods where DCC outages coincide with power outages , particularly during adverse weather events . This enhancement will support more effective outage management and reduce the operational challenges associated with such clashes.	Thank you – This will be taken under advisement as the Modification is assessed.
Scottish & Southern	Network Party	No	We do not anticipate any impact to our organisation or systems or day-to-day operations as a result of this modification. However, the proposal would bring a clear operational benefit by allowing us to manage adverse	Thank you – This will be taken under advisement as the Modification is assessed.

Question 4				
Respondent	Category	Response	Rationale	SEC Change Team Response
Electricity Network			weather scenarios more effectively when DCC planned outages coincide with weather-related power cuts.	

Question 5: Will your organisation incur any costs in implementing MP293?

Question 5				
Respondent	Category	Response	Rationale	SEC Change Team Response
SP Electricity North West	Network Party	£0	As per our response to Q4 we do not expect any implementation costs but we expect some minimal costs savings from avoiding an unnecessary and burdensome DCC deferment process.	Thank you.
National Grid Electricity Distribution	Network Party	£0	There will be no costs to our organisation in the implementation of MP293.	Thank you.
EON Next	Large Supplier	£0	The cost savings will be received by the DNOs	Thank you.
British Gas	Large Supplier	£0	We assume that there won't be any changes at our end (Large Supplier) if this modification is progressed – ie all changes would be on the DCC side.	Thank you.
BUUK	Network Party	£0	-	-
Northern Powergrid	Network Party	£0	There will be no costs to Northern Powergrid in the implementation of MP293.	Thank you.
DCC	DCC	[None Given]	-	-
E	Small Supplier	£0	Implementation sits outside a supplier's operational processes.	Thank you.

Question 5				
Respondent	Category	Response	Rationale	SEC Change Team Response
UK Power Networks	Network Party	£0	UK Power Networks does not expect any implementation costs	Thank you.
Scottish Power Energy Network	Network Party	£0	There will be no costs to our organisation in the implementation of MP293, as outlined in Q4 .	Thank you.
Scottish & Southern Electricity Network	Network Party	£0	As noted in the previous question, there are no anticipated costs expected in the implementation of MP293.	Thank you.

Question 6: Will there be any benefit to your organisation in implementing MP293?
Please provide an answer in respect of the DSP1 solution, the optional DSP2 solution, and the optional “Add On” elements, where you are able to do so.

Question 6				
Respondent	Category	Response	Rationale	SEC Change Team Response
SP Electricity North West	Network Party	£500,000 or more	Refer to our: - Attachment 1 - SUMMARY OF COLLECTIVE BENEFITS AND COST SAVINGS TO NETWORK OPERATORS - Attachment 2 – MAPPING OF OVERLAPS BETWEEN DCC PLANNED Ouatges V Adverse Weather Events The attachments have been agreed between all Network Operators collectively. We have ticked the expected cost savings of £500k or more based on the collective Network Operator costs savings set out in the attachments.	Thank you – This will be taken under advisement as the Modification is assessed.
National Grid Electricity Distribution	Network Party	£500,000 or more	Refer to our: - Attachment 1 - SUMMARY OF COLLECTIVE BENEFITS AND COST SAVINGS TO NETWORK OPERATORS - Attachment 2 – MAPPING OF OVERLAPS BETWEEN DCC PLANNED Ouatges V Adverse Weather Events The attachments have been agreed between all Network Operators collectively. We have ticked the expected cost savings of £500k or more based on the collective Network Operator costs savings set out in the attachments. In addition, the implementation of MP293 would bring a considerable saving in terms of time,	Thank you – This will be taken under advisement as the Modification is assessed.

Question 6						
Respondent	Category	Response	Rationale			SEC Change Team Response
			when there is a need to request a deferment. Time-saving efficiencies are particularly critical during operational periods where the productive use of time is crucial. For context, we trialled the deferment process during Storm Bram, and diverted resources away from planning and response in order to determine whether a deferment was required. Conversations with the DCC took place throughout the day (process initiated at 09:30 and concluded at 16:30) but despite the lengthy process, a deferment was not authorised.			
EON Next	Large Supplier	£0	No further analysis can be provided in the available time.			-
British Gas	Large Supplier	£1-£49,999	If prepayment flows are included, there will be some benefit (lower customer service calls, etc, in the (relatively rare) situation that an extreme weather event coincides with DCC planned maintenance.			Thank you – This will be taken under advisement as the Modification is assessed.
BUUK	Network Party	£500,000 or more	We refer to SP ENW’s response to this Consultation (including attachments) that collectively incorporates benefits to all Network Operators.			Thank you.
Northern Powergrid	Network Party	£500,000 or more	Please refer to the below chart that details the IIS impact (£ million) on the days Northern Powergrid had storm events. The figures detailed below just use the CML (Customer Minutes Lost) element as the Smart Meters wouldn’t impact the CI (Customers Interrupted) calculation:			Thank you – This will be taken under advisement as the Modification is assessed.
			Outage Date	Outage Detail	Major Incident	

Question 6								
Respondent	Category	Response	Rationale				SEC Change Team Response	
						from CML		
			27/08/2024	Business Continuity Disaster Recovery Testing	23/24 th Aug 2024 Storm Lilian	£3.32		
			06/11/2024	Planned Maintenance	23 rd Nov 2024 Storm Bert	£0.57		
			10/12/2024	Planned Maintenance	7/8 th Dec 2024 Storm Darragh	£4.53		
			21/01/2025	Planned Maintenance	5 th Jan 2025 Snow/Ice/Rain event	£0.68		
			21/01/2025	Planned Maintenance	24-27 th Jan 2025 Storm Eowyn/Herminia	£7.83		
			12/08/2025	Planned Maintenance	4 th Aug 2025 Storm Floris	£0.62		
			Based on the table above, the IIS cost equates to approximately £2.61 million per event. For the purposes of this assessment, we have rounded this figure down to £2 million to account for several high-cost outliers. Assuming that access to smart meter data would have reduced these costs by 10%, this represents an estimated saving of £200,000 per event.					

Question 6				
Respondent	Category	Response	Rationale	SEC Change Team Response
			In 2024 there were three overlapping events, and in 2025 there were four. It is therefore reasonable to assume an average of three overlapping events per year going forward. On this basis, the estimated value of being able to access smart meter data during adverse weather events, from a Northern Powergrid perspective, is approximately £600,000 per annum. If this rationale is extrapolated across all Distribution Network Operators (DNOs), this would equate to: $14 \div 2 \times £600,000 = £4.2 \text{ million per annum.}$ This is greater than the DCC Option 1 and Option 2 cost of £600,000 to £900,000 plus £300,000 annual operating costs. This provides an indicative estimate of the potential system-wide benefit of enabling smart meter data access during adverse weather events	
DCC	DCC	[None Given]	-	-
E	Small Supplier	£1-£49,999	Limited financial saving due to reduced administration cost for planned outages. However, there are very significant other benefits that are difficult to quantify financially: For DSP1 there is significant benefit to consumers from being able to top up during planned outages and potentially some unplanned outages.	Thank you – This will be taken under advisement as the Modification is assessed.

Question 6				
Respondent	Category	Response	Rationale	SEC Change Team Response
			For DSP2 there is a similar benefit for consumers. This also extends out to providing stability and contingency whilst DSP2 is within its infancy. Should a Cat 1 issue occur, there is still a way for consumers to obtain UTRN (Smets 1) and to top up the meter. Also reduces the risk of mass meter replacement.	
UK Power Networks	Network Party	£500,000 or more	We have focused our answer on the overall expected DNO benefits of MP293 being introduced before the start of DSP2. The table below contains a summary of the DNO group benefits for GB. Collective benefits and cost savings to network operators as a GB level have been collated and agreed between all network operators and the ENA. We have ticked the cost savings of £500k or more based on the collective Network Operator cost savings set out by SPENW. An extract of how this was achieved is added below for completeness. The DNOs compared how many power outage alerts they usually receive each day with the number they receive during the worst storm days. This produced a multiplier value, and the DNOs took both the average multiplier (seven) and the highest one found (23). They used these multipliers to calculate savings by multiplying them with the daily benefit of smart meter alerts (which is about £8,000, or £0.008m, based on dividing the annual figure (£2.9m) from the Green PA Consulting report by 365 days). Next, this amount was multiplied by the number of times planned outages coincided with storm days last year, and then again by two to account for the two years before DSP2 is implemented. By performing these calculations using both the average and highest multipliers, they arrived at cost savings of between £1.23m – £4.05m for the remainder of DSP1.	Thank you – This will be taken under advisement as the Modification is assessed.

Question 6

Question 6																												
Respondent	Category	Response	Rationale				SEC Change Team Response																					
			<table><tr><th>Scenario</th><th>Benefits /day</th><th>BENEFIT Multiplier (POWER OUTAGE ACTIVITY)</th><th>BENEFITS /ANNUM</th><th>OVERLAP MULTIPLIER</th><th>Cost Savings/annum</th><th>Costs savings As is DSP (two years before DSP2 is implemented)</th></tr><tr><td>High peak demand for use of DCC AD1 service during a storm</td><td>£0.008m</td><td>x23</td><td>(£0.008m x23) = £0.184m</td><td>x11</td><td>(£0.184m x11) = £2.02m</td><td>(£2.02m x2) = £4.05m</td></tr><tr><td>Average demand for use of DCC AD1 service during a storm</td><td>£0.008m</td><td>x7</td><td>(£0.008m x11) = £0.056m</td><td>x11</td><td>(£0.056m x11) = £0.62m</td><td>(£0.62m x2)= £1.23m</td></tr></table>				Scenario	Benefits /day	BENEFIT Multiplier (POWER OUTAGE ACTIVITY)	BENEFITS /ANNUM	OVERLAP MULTIPLIER	Cost Savings/annum	Costs savings As is DSP (two years before DSP2 is implemented)	High peak demand for use of DCC AD1 service during a storm	£0.008m	x23	(£0.008m x23) = £0.184m	x11	(£0.184m x11) = £2.02m	(£2.02m x2) = £4.05m	Average demand for use of DCC AD1 service during a storm	£0.008m	x7	(£0.008m x11) = £0.056m	x11	(£0.056m x11) = £0.62m	(£0.62m x2)= £1.23m	
Scenario	Benefits /day	BENEFIT Multiplier (POWER OUTAGE ACTIVITY)	BENEFITS /ANNUM	OVERLAP MULTIPLIER	Cost Savings/annum	Costs savings As is DSP (two years before DSP2 is implemented)																						
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Scottish Power Energy Network	Network Party	£500,000 or more	Please refer to our: - Attachment 1 - SUMMARY OF COLLECTIVE BENEFITS AND COST SAVINGS TO NETWORK OPERATORS - Attachment 2 – MAPPING OF OVERLAPS BETWEEN DCC PLANNED OUATGES V ADVERSE WEATHER EVENTS The attachments have been agreed between all Network Operators collectively. We have ticked the expected cost savings of £500k or more based on the collective Network Operator costs savings set out in the attachments.				Thank you – This will be taken under advisement as the Modification is assessed.																					
Scottish & Southern	Network Party	£500,000 or more	As part of the consultation response, Network Operators have worked collaboratively on the following supporting attachments.				Thank you.																					

Question 6				
Respondent	Category	Response	Rationale	SEC Change Team Response
Electricity Network			• Attachment 1 - SUMMARY OF COLLECTIVE BENEFITS AND COST SAVINGS TO NETWORK OPERATORS • Attachment 2 – MAPPING OF OVERLAPS BETWEEN DCC PLANNED OUTFAGES V ADVERSE WEATHER EVENTS	

Question 7: How long from the point of approval would your organisation need to implement MP293?

Question 7				
Respondent	Category	Response	Rationale	SEC Change Team Response
SP Electricity North West	Network Party	n/a	As there are no system impacts.	Thank you.
National Grid Electricity Distribution	Network Party	n/a	As per our answer to Q4, we do not expect to see any impacts on our systems/general processes, etc, therefore we would be happy to see this modification implemented at the soonest opportunity, which we understand to be 6th November 2026.	Thank you.
EON Next	Large Supplier	n/a	No implementation required by Suppliers.	Thank you.
British Gas	Large Supplier	No time required	We don't believe there would be any implementation requirements on our side.	Thank you.
BUUK	Network Party	n/a	-	-
Northern Powergrid	Network Party	n/a	The enhancements delivered under the modification would be applied automatically once the functionality is enabled. As a result, Northern Powergrid would not require any lead time to implement MP293. We therefore support implementation at the earliest opportunity, namely the proposed go-live date of 6 th November 2026	Thank you.

Question 7				
Respondent	Category	Response	Rationale	SEC Change Team Response
DCC	DCC	[None Given]	-	-
E	Small Supplier	No time as I don't believe MP293 to impact business operational processes directly.	The changes occur outside of supplier systems, implementation is outside supplier involvement.	Thank you.
UK Power Networks	Network Party	N/A	There is no system implementation to take place for UK Power Networks.	Thank you.
Scottish Power Energy Network	Network Party	N/A	There is no impact on SPEN systems , and therefore no implementation activities are required .	Thank you.
Scottish & Southern Electricity Network	Network Party	N/A	As this change is non impacting there are no implementation timeframes associated.	Thank you.

Question 8: Do you believe that MP293 would better facilitate the General SEC Objectives?

Question 8				
Respondent	Category	Response	SEC Objective(s)	Rationale
SP Electricity North West	Network Party	Yes	a, b, c, e	Yes. This modification will better facilitate objectives (a), (b), (c) and (e) via: - Better enabling the DCC to avoid a reduced service for critical services during DCC planned outages - Reducing risks to Network Operators DCC users being unable to communicate with SMSs and need for an on site presence during an adverse weather/outage overlap. - Enables Network Operators and Suppliers to continue to communicate with SMS for specific SRVs/alerts during an adverse weather/outage overlap which facilitates faster power restoration/information which directly benefits customers who require extra care (such as those who reliant on electricity for medical purposes, the elderly, with young children or on prepayment meters).
National Grid Electricity Distribution	Network Party	Yes	a, b, c, e	Smart Metering Systems can continue to be used for the purpose intended, in particular and most importantly, during any adverse weather event (regardless of whether a planned outage maybe be happening at the same time) when having oversight of the network is most critical for Network Operators. This will not only ensure the safety of our field operatives by not having to send them to site unnecessarily, but also will ensure the fastest possible restoration times for consumers due to more accurate and therefore effective planning. This will also offer a more insightful overview allowing us to prioritise more vulnerable consumers wherever possible.

Question 8				
Respondent	Category	Response	SEC Objective(s)	Rationale
				The DCC will not need to consider deferments, not only holding up their own workload but causing 'knock-on effects' to related works of other parties.
EON Next	Large Supplier	[None Given]	e	In an ideal world, the MP293 solution would better facilitate SEC objective(e), but whether it provides value for money to energy consumers is in question.
British Gas	Large Supplier	[None Given]	a, e	We agree with General SEC Objectives (a) and (e), as per the Modification Report. There is also a wider benefit to the modification, outside of the scope of the General SEC Objectives, in supporting continuity of supply (or faster restoration of supply) to customers.
BUUK	Network Party	Yes	a, c, e	This modification supports objectives (a), (c) and (e) by reducing the risk of Network Operators losing SMS communication during adverse weather and outages, avoiding onsite visits. It also maintains essential SRV and alert messaging, enabling quicker power restoration and timely support for vulnerable customers, including medical, elderly, young families and prepayment users.
Northern Powergrid	Network Party	Yes	a, b, c, e	The implementation of this modification will ensure that smart metering functionality remains available during high-impact or adverse weather events; precisely when Network Operators have the greatest need for the information that smart meters can provide. Access to this functionality supports more efficient deployment of field resources, thereby reducing customer restoration times and minimising the exposure of field teams to adverse weather conditions
DCC	DCC	[None Given]	-	-

Question 8				
Respondent	Category	Response	SEC Objective(s)	Rationale
E	Small Supplier	Yes	a, b, c, e	- Increases top up availability for consumer - Increases availability of dcc services - Improving the operation of energy networks and the efficiency of resourcing during planned outages.
UK Power Networks	Network Party	[None Given]	a, c, e	UK Power Networks believes this modification will better facilitate objectives (a), (c) and (e) via: - Reducing the requirement for Network Operators to carry out an on-site investigation during an adverse weather/outage overlap, instead of being able to communicate with the customers Smart Meter to confirm the status of their supply. - Enabling Network Operators to continue to communicate with smart meters for specific Service Request Variants/alerts during an adverse weather/outage overlap which facilitates faster power restoration/information which directly benefits customers who require extra care (such as those who reliant on electricity for medical purposes, the elderly, with young children or on prepayment meters).
Scottish Power Energy Network	Network Party	Yes	a, b, c, e	If MP293 was to be implemented, smart meters would continue to send some important SRs and Alerts during DCC outages. This is particularly important during any adverse weather event. - Network Operators would still have the necessary visibility of the network when it is most critical. - This will also offer a more insightful overview helping us to prioritise vulnerable consumers wherever possible.

Question 8				
Respondent	Category	Response	SEC Objective(s)	Rationale
				Ensure the safety of our field staff by reducing the need to send them to site unnecessarily.
Scottish & Southern Electricity Network	Network Party	Yes	a, b, c, e	SSEN believe that this modification would ensure Smart Metering Systems remain usable during severe weather even if a DCC outage is underway, giving Network Operators vital visibility, removing unnecessary site visits. This supports quicker restoration and helps us focus on consumers who may need additional assistance. It also removes the need for DCC deferment requests, avoiding delays for both the DCC and other affected parties. The change supports SEC objectives by maintaining critical functionality during planned outages, reducing operational risks, and enabling timely alerts and messages that directly benefit customers.

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP293 is implemented?

Question 9				
Respondent	Category	Response	Rationale	SEC Change Team Response
SP Electricity North West	Network Party	Yes	During overlaps between DCC planned outages and severe weather warning periods (which we refer to as adverse weather events) if a customer power is off supply, the customer does not benefit from their Network Operator being a DCC network user in communicating with the customers SMSs. If MP293 is implemented, customers will benefit from their Network Operator being able to communicate with the customers SMS and as such the customer would be a recipient of Network Operators: • faster restoration times of supply • earlier fault notification • reduce requirement for customer to call emergency and fault lines	Thank you – This will be taken under advisement as the Modification is assessed.
National Grid Electricity Distribution	Network Party	Yes	As a Network Operator, we would be able to maintain critical usage of the DCC Network during adverse weather events, regardless of whether there was a DCC outage or not. This means that we would retain full sight of the activity on our network, particularly which areas are worst affected, allowing us to manage and prioritise our	Thank you – This will be taken under advisement as the Modification is assessed.

Question 9				
Respondent	Category	Response	Rationale	SEC Change Team Response
			resources accordingly. In addition, rather than having to use our field operatives to visit properties in order to check whether supplies are on/off, these teams would be able to use their time more effectively by fixing the known faults, and not having to disturb consumers at often unsociable hours. This benefits consumers as we can be more proactive during power outages, reinstating more power supplies within a shorter period of time and reducing the burden on the consumer to have to keep calling emergency/fault lines.	
EON Next	Large Supplier	No	There would be benefits to customers, but only in the rare occurrences of overlaps between adverse weather and DCC maintenance, and only until DSP2 offers similar functionality 2 years later.	Overlaps are not rare. Evidence submitted by Network Operators demonstrates 40% of all DCC planned outages within a storm season (current and last years) overlaps with an adverse weather event (defined as a Met office yellow, amber or red extreme weather warning). This includes four overlaps from DCC planned outages with Met office named storms in the last 16 months).
British Gas	Large Supplier	Yes	See comment above in Question 8.	Thank you.
BUUK	Network Party	Yes	Consumers will benefit from their Network Operator being able to communicate with the customer SMS, leading to earlier notification, lower customer effort and faster restoration.	Thank you – This will be taken under advisement as the Modification is assessed.

Question 9				
Respondent	Category	Response	Rationale	SEC Change Team Response
Northern Powergrid	Network Party	Yes	The customer can expect their supply to be restored in a timelier fashion during an adverse weather event. Furthermore under the “Must and Should” functionality it would allow customers to top up their pre-payment meters when that was previously unavailable to them.	Thank you – This will be taken under advisement as the Modification is assessed.
DCC	DCC	[None Given]	-	-
E	Small Supplier	Yes	• DNO will get consumers back on supply more quickly • Consumers able to process top ups • Avoid off supply incidences Please refer to Question 6 for impacts on consumers.	Thank you – This will be taken under advisement as the Modification is assessed.
UK Power Networks	Network Party	Yes	If MP293 is implemented, customers would benefit from their Network Operator retaining access to key SRVs and Alerts through the Enhanced Availability service. As a result, consumers would be more likely to experience: • Faster restoration of supply, as Network Operators can remotely verify supply status and prioritise resources more effectively;	Thank you – This will be taken under advisement as the Modification is assessed.

Question 9				
Respondent	Category	Response	Rationale	SEC Change Team Response
			- Earlier fault identification and notification, reducing the time customers remain off-supply during adverse weather; - Reduced need for customers to contact emergency or fault reporting lines, as Network Operators can proactively identify affected areas. Taken together, MP293 would strengthen resilience during storm-related outages and improve the quality of service to customers and timeliness of restoration services.	
Scottish Power Energy Network	Network Party	Yes	During DCC planned outages, if a customer's power goes off supply, they do not receive the usual benefits of having a smart meter. This is particularly the case during adverse weather events, when visibility of outages is most important. If MP293 is implemented, DNOs would be able to communicate with customers' smart meters and determine whether their supplies are on or off. Benefits include. - faster restoration times of supply - earlier fault notification reduce requirement for customer to call emergency and fault lines	Thank you – This will be taken under advisement as the Modification is assessed.

Question 9				
Respondent	Category	Response	Rationale	SEC Change Team Response
Scottish & Southern Electricity Network	Network Party	Yes	When severe weather coincides with a DCC planned outage, Network Operators currently lose the ability to interact with customers' smart meters, limiting visibility of who is off supply and delaying response. Implementing MP293 would prevent this issue by allowing Network Operators to continue receiving smart meter communications/data during these periods. This would give customers clear benefits, including quicker restoration, earlier awareness of faults, and reduce emergency contact centre call queues. It would also enable Network Operators to see which areas are most affected without sending engineers to check individual properties, allowing field teams to focus directly on repairs. This more efficient use of resources supports faster restoration for consumers.	Thank you – This will be taken under advisement as the Modification is assessed.

Question 10: Noting the costs and benefits of this modification, do you believe MP293 should be approved? Please provide an answer in respect of the DSP1 solution, the optional DSP2 solution, and the optional “Add On” elements, where you are able to do so.

Question 10				
Respondent	Category	Response	Rationale	SEC Change Team Response
SP Electricity North West	Network Party	Yes	For avoidance of doubt as proposer we confirm: - our preference is for implementation of the As is DSP “Must & Should” solution by the 6 November as a minimum and SECAS work with Ofgem regarding obtaining the necessary Authority consent in time. Refer to bullets 5 and 7 which would support a later implementation date/separate modification for the SMETS2 add on changes and DSP2. - we are interested in additional SRVs/Alerts which impact Network Operators (such as 8F36) being included in the solution if the Full IA can demonstrate no material additional costs and no impact on an implementation of 6 November 2026. - we would not support the SMETS1 add on at a cost of £2.5-4m for reasons detailed in our response to Q6. - we would not support the SMETS2 add ons at a combined cost of £1.3- £1.5m; if the DCC are	Thank you – This will be taken under advisement as the Modification is assessed.

Question 10				
Respondent	Category	Response	Rationale	SEC Change Team Response
			able to provide (with evidence) high confidence levels of a low likelihood of CSP and DSP being in parallel unavailable we would view the combined costs of to outweigh the risk 5. we would support the SMEST2 add on changes at a later implementation date/separate modification; if the DCC are unable to provide high confidence levels of a low of CSP and DSP being in parallel unavailable we would view the combined costs of to outweigh the risk 6. we would not support the DSP2 changes; if the DCC are able to provide high confidence levels (with evidence) of a high likelihood of DSP2 having only 4 hours of unavailability for all outages. 7. we would support the DSP2 changes at a later implementation date/separate modification; if the DCC are unable to provide high confidence levels of a high likelihood of DSP2 having only 4 hours of unavailability for all outages.	
National Grid Electricity Distribution	Network Party		We believe that MP293 should be approved, noting the costs and benefits to industry parties and consumers. We believe the 'Must and Should' solution should be implemented by 6th November 2026.	Thank you – This will be taken under advisement as the Modification is assessed.

Question 10				
Respondent	Category	Response	Rationale	SEC Change Team Response
			We would like to explore other SRVs/alerts such as: • The 0x8F36 (Supply Outage Restored - Outage >= 3 minutes) – this alert would be beneficial to us and potentially other Network Operators if they were to be added to the solution, assuming that in doing so, no significant costs are added and there is no impact on the implementation date. We use this alert to check for restoration, so it is valuable to us during adverse weather events when planning usage of resources. • • The N13 Failure to receive Response from Device – we use this response alert in our PSR business process so it would be helpful to maintain continued use, so that we can ensure the processes we have put in place to protect our most vulnerable consumers are not affected. We would not be supportive of the SMETS1 add-on which is estimated to cost £2.5m - £4m. The reasons for this are detailed within the attachments provided alongside our answer to Q6. At this stage we would not be supportive of the SMETS2 add-ons which when combined, are estimated to cost £1.3m - £1.5m. However, if the DCC are able to provide evidence to back up high confidence levels of a low likelihood of CSP and DSP being unavailable at the same	

Question 10				
Respondent	Category	Response	Rationale	SEC Change Team Response
			time, we would potentially reconsider based on the risk/costs, possibly considering whether a later implementation/separate modification would be necessary. If the DCC can provide evidence which corroborates the claim and proves a high likelihood of DSP2 needing only 4 hours of unavailability for all outages, we would not see the need for the DSP2 changes. That said, if this evidence cannot be made available, we would be supportive of the DSP2 changes (potentially with a later implementation date/separate modification if needed, to protect/support the time critical nature of MP293)	
EON Next	Large Supplier	No	Although the MP293 solution seems worthy, no benefit case has been made available by the DNOs to justify a > £1m implementation cost for the basic option (the testing post-PIT will produce significant additional costs). It feels that the proposed new DSP1 EA environment will be more complicated and difficult to support than the current environment (with associated additional support costs of £300K pa) There will be risks in its implementation e.g. in terms of configuration changes to critical live components e.g. F5 Load Balancers.	The Refinement Consultation responses from Network Parties alone provides a strong benefits case for the implementation of the “Must” solution option due to Network Party cost savings/benefits. Additionally, a benefits case has also been provided by other Supplier parties for the “Must & Should” solution option. In the Proposer’s view, there is no evidence to support a risk in implementation.

Question 10				
Respondent	Category	Response	Rationale	SEC Change Team Response
			There will be additional support risks in EA switch-on and EA switch-off. I believe that in its current format, the EA solution wouldn't work if the DSP has failed over to the backup site. The EA solution wouldn't work if the F5 Load Balancers or network elements are non-functional. The whole solution will be overtaken by DSP2 with 99.9x % availability and virtually zero downtime, 2 years into the MP293 solution. The optional element to the DSP2 solution seems unnecessary. Further CSP add-on elements again do not seem to provide value for money.	Consumers can not await the implementation of DSP2, based on current trends, it is forecast that there will be a 40% likelihood of an overlap with DCC planned outages for the remainder of DSP1 (which is two further storm seasons). As the number of DCC planned outages is increasing and with climate change extreme weather events becoming more common, it so forecast there could be 11 overlaps a year (22 in total) for the remainder of the DSP. Whilst the likelihood is anticipated to be low risk, DCC have been unable to provide certainty that there is no requirement for this solution beyond DSP1. Based on Network Party data on current trends, it is forecast that there is a 40% likelihood of an overlap of adverse weather with DCC planned outages for the remainder of DSP1 (which is two further storm seasons). This forecast means that consumers cannot await the implementation of DSP2.

Question 10				
Respondent	Category	Response	Rationale	SEC Change Team Response
				As the number of DCC planned outages is increasing, in conjunction with climate change-related extreme weather events becoming more common, it so forecast there could be 11 overlaps a year (22 in total) for the remainder of the DSP. Whilst the likelihood is anticipated to be low risk, DCC have been unable to provide certainty that there is no requirement for this solution beyond DSP1.
British Gas	Large Supplier	Yes	See our answer to Question 1 for details on each of DSP1, DSP2 and the optional 'Add On' elements.	Thank you.
BUUK	Network Party	Yes	We believe that the 'Must and Shout' solution most benefits industry as a whole.	Thank you.
Northern Powergrid	Network Party	Yes	Northern Powergrid considers that MP293 should be approved, as we believe it will deliver significant benefits to both our customers and wider industry partners. We also support implementation of the combined 'Must and Should' solution on the proposed implementation date of 6 November 2026.	Thank you – This will be taken under advisement as the Modification is assessed.
DCC	DCC	[None Given]	-	-
E	Small Supplier	Yes	Due to the small differences in cost between solution 1 and solution 2, whilst considering the wider benefits	Thank you.

Question 10				
Respondent	Category	Response	Rationale	SEC Change Team Response
			solution 2 delivers to supplier, network operators and consumers. I would endorse solution 2 is considered for implementation as a minimum. (very strong business case to protect consumers) All other extension packs would also be welcomed.	
UK Power Networks	Network Party		UK Power Networks supports approval of MP293. Our positions on the solution options are as follows: • Our preference is for implementation of the 'As Is DSP' Enhanced Availability service ("Must & Should" – EA Option 2) by 6 November 2026 as a minimum. We support SECAS engaging early with Ofgem to secure timely Authority consent given the immovable DSP1 delivery window. • We would be supportive of including additional Network-Operator-beneficial SRVs/Alerts (such as 8F36) where the Full Impact Assessment demonstrates no material additional cost and no impact on the 6 November 2026 implementation date. • We do not support the SMETS1 add-on, as the £2.5m – £4m cost range does not provide an adequate return on investment, particularly in the context of the SMETS1 replacement programme.	Thank you – This will be taken under advisement as the Modification is assessed.

Question 10				
Respondent	Category	Response	Rationale	SEC Change Team Response
			- We do not support the SMETS2 add-ons, given their combined cost of £1.3m–£1.5m. If the DCC can provide high-confidence evidence demonstrating that the likelihood of simultaneous CSP and DSP unavailability is genuinely low, this would reinforce our view that the cost of these add-ons outweighs the risk they are intended to mitigate. If the DCC cannot provide this level of confidence, then we will need to revisit this add-on once further information is available. - We would support the DSP2 changes, assuming that DCC's Full Impact Assessment provides clarity on confidence levels, feasibility and lead-times, as these would provide an enduring solution as the smart metering ecosystem transitions from DSP1 to DSP2. Overall, we consider the enhanced availability functionality for DSP1 to be essential, with any additional scope being contingent on clear cost-benefit justification and assurance that delivery timelines are not compromised.	
Scottish Power Energy Network	Network Party	Yes	We believe that MP293 should be approved , taking into account the costs and benefits for industry parties and consumers. We support the ' Must and Should ' solution and recommend that it be implemented by 6 November 2026 .	Thank you – This will be taken under advisement as the Modification is assessed.

Question 10				
Respondent	Category	Response	Rationale	SEC Change Team Response
			We would like to explore other SRVs/alerts such as: • The 0x8F36 (Supply Outage Restored - Outage >= 3 minutes) – Although SPEN does not currently use this alert message as part of our incident management process, many other DNOs do. We are also assessing the potential benefits, so including this functionality may provide value to us in the future. Regarding the 'Optional Add Ons' • We would not be supportive of the SMETS1 add-on which is estimated to cost £2.5m - £4m. The reasons for this are detailed within the attachments provided alongside our answer to Q6. • We would not be supportive of the SMETS2 add-ons at this stage, given that their combined cost is estimated to be £1.3m–£1.5m. However, if the DCC is able to provide evidence demonstrating a <i>high level of confidence</i> in the low likelihood of simultaneous CSP and DSP unavailability, we would be open to reconsidering this position based on the associated risk and cost. In such a scenario, we may also consider whether a later implementation date or a separate modification would be more appropriate.	

Question 10				
Respondent	Category	Response	Rationale	SEC Change Team Response
			If the DCC can provide evidence that corroborates their claim and demonstrates a high likelihood that DSP2 will require only 4 hours of unavailability for all outages, we would not support the DSP2 add-ons. However, if this evidence cannot be provided, we would be supportive of implementing the DSP2 changes, potentially with a later implementation date or separate modification if required, to help keep MP293 on track, given how time-critical it is.	
Scottish & Southern Electricity Network	Network Party	Yes	SSEN believe that MP293 should be approved. Taking into account the balance of costs and the clear benefits it offers to both industry participants and consumers. In our view, the combined “Must and Should” package should be approved and progressed. We would also welcome further exploration of retaining additional SRVs/alerts, specifically: • 0x8F36 (Supply Outage Restored $\geq$ 3 minutes): This alert plays an important role in confirming restorations, particularly during severe weather when resource planning is critical and would add meaningful operational value for Network Operators. SSEN do not support the proposed SMETS1 add-on, given its estimated cost of £2.5m–£4m and the limited functionality SMETS1 provides in relation to SMETS2 with the inability to produce outage alerts which is a key benefit driver as part of this SEC Mod.	Thank you – This will be taken under advisement as the Modification is assessed.

Question 10				
Respondent	Category	Response	Rationale	SEC Change Team Response
			Regarding DSP2, if the total downtime required will reliably remain within a four-hour window, then additional DSP2-related changes may not be necessary. If that level of confidence cannot be demonstrated, SSEN would support the DSP2 solution. This could potentially form a staggered or standalone timeline to avoid jeopardising the time-critical implementation of MP293.	

Question 11: Please provide any further comments you may have.

Question 11			
Respondent	Category	Comments	SEC Change Team Response
SP Electricity North West	Network Party	MP289 consultation has just closed and we are aware of the decision for to defer and for the Change Team to work with the DCC to organise a workshop with interested industry participants to discuss BCDR engagement before the modification is brought back to the Change Board. We request the Change Team and DCC be aware of the evidence provided by the SEC parties and the DCC as part of its IA under this Modification MP293. The DCC response to concerns raised by SEC parties during the MP289 refinement consultation is that <i>Over recent years, the DCC has been deploying BCDR Testing and categorised those tests as Service impacting or non-service impacting. The Proposer is not aware of a time where those categorisations have proven to be inaccurate or where Parties have been unexpectedly impacted.</i>" It is incorrect that Parties have not been impacted - Network Parties have been impacted unexpectedly by a Storm clashing with the BCDR testing. Parties have made the DCC and SECAS aware that a BCDR test clashed with Storm Ashley in October 2024 and created the issues to Network Operators as set out in the problem statement to MP293.	Thank you – This will be taken under advisement as the Modification is assessed.

Question 11			
Respondent	Category	Comments	SEC Change Team Response
National Grid Electricity Distribution	Network Party	Within the refinement consultation of MP289, SEC parties raised some concerns and the DCC responded with the following: <i>“Over recent years, the DCC has been deploying BCDR Testing and categorised those tests as Service impacting or non-service impacting. The Proposer is not aware of a time where those categorisations have proven to be inaccurate or where Parties have been unexpectedly impacted.”</i> Network Parties were in fact unexpectedly impacted by Storm Ashley clashing with BCDR testing in October 2024 and have informed SECAS and the DCC. It was this clash that created the need for this modification, as detailed within the problem statement for MP293.	
EON Next	Large Supplier	The proposed implementation timescale of Nov 2026 (if approved by Aug 2026) seems unrealistic. Originally, DCC stated that June 2027 was unrealistic. Whilst acknowledging the competing viewpoints of network parties and the DCC, a collaborative way of deferring planned maintenance that overlap with extreme weather conditions seems the logical way forward for the period before DSP2 becomes fully operational at the end of 2028.	Thank you – This will be taken under advisement as the Modification is assessed.
British Gas	Large Supplier	We ideally would like to know when our messages are sent via the back up solution, especially if the solution is also used for any unplanned maintenance events.	Thank you – This will be taken under advisement as the Modification is assessed.
BUUK	Network Party	-	-

Question 11			
Respondent	Category	Comments	SEC Change Team Response
Northern Powergrid	Network Party	n/a	
DCC	DCC	DCC considers that the As IS DSP solution including the “Must and Shoulds” option (labelled as Solution Option 2 above) should be considered, and that the “Must” (Solution Option 1) is both extremely limited, of no benefit to Energy Suppliers, and should be discounted Contrary to the above text, DCC notes the date for implementation is not fixed to 8 November 2026, and the delivery time quoted of 3 – 6 months only covers Design, Build, and PIT, and in addition is only an estimate. Details of the planned implementation will be established as part of the FIA. DCC is not recommending nil User Integration Testing. DCC believes that thorough testing of the EA Service will be required, including User testing during a simulated outage. Full details of the recommended testing will be agreed as part of the FIA, and in agreement with TAG. DCC notes the implementation duration and costs to publish a Full Impact Assessment for CSP North, CSP South and Central, SMETS1, Future DSP, and the 4G Comms Hub Device Manger are substantial. As noted in the report, the expected timelines to deliver for all the other options would not fit into a November timeline. and Parties should consider these factors when deciding whether to approve the request for a FIA for the options. It should also be noted that the “other options” are separate and standalone to the As Is and Future DSP EA Services, and would continue to operate alongside the Future DSP.	Thank you – This will be taken under advisement as the Modification is assessed.

Question 11			
Respondent	Category	Comments	SEC Change Team Response
		Further if an EA Service was implemented for one of the CSPs or the SMETS1 Service Providers, it could be operated for an outage on that Service Provider alone. Such an EA Service is independent of, and not dependant on, a DSP outage. DCC notes that any EA Service would be able to pass not only SRVs and Device Alerts, but Responses to the selected SRVs. The proposed list is currently set at: •Proposed SRs and Responses: 2.2, 4.3, 7.4 •Proposed Alerts: AD1, N56 But this could be updated or to allow further SRV and Alerts that meet the required criteria for eligibility in the EA Service. The list would be set in consultation with Parties. DCC recognises the concerns of security colleagues and Parties in general around the statements regarding Anomaly Detection. The As Is EA Service will provide Anomaly Detection limiting throughput of messages, but will not provide quarantine services, which we believe is an effective compromise.	
E	Small Supplier	-	-
UK Power Networks	Network Party	UK Power Networks does not have any further comments	-
Scottish Power Energy Network	Network Party	Within the refinement consultation for MP289, SEC Parties raised several concerns, to which the DCC responded:	Thank you – This will be taken under advisement as the Modification is assessed.

Question 11			
Respondent	Category	Comments	SEC Change Team Response
		'Over recent years, the DCC has been deploying BCDR Testing and categorised those tests as Service impacting or non-service impacting. The Proposer is not aware of a time where those categorisations have proven to be inaccurate or where Parties have been unexpectedly impacted.' However, Network Parties were unexpectedly impacted when Storm Ashley coincided with BCDR testing in October 2024. This clash was reported to both SECAS and the DCC.	
Scottish & Southern Electricity Network	Network Party	N/A	-