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MP293

‘Deferment of DCC Planned Maintenance during Adverse Weather’

Modification Report

Version 0.2

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Corporate member of
Plain English Campaign
Committed to clearer
communication

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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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1. Summary

This proposal has been raised by Abigail Watson from Electricity North West Limited (ENWL). 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at that time there being no recorded occurrence of clash between adverse weather and a DCC planned outage, MP166 was withdrawn.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 Draft Modification seeks to re-explore this issue as new information relating to the costs and benefits has become available.

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 energy 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 Smart Metering System (SMS) 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 Maintenance event overlaps with an adverse weather event (both during and following the event), a Network Party will lose the ability to communicate with a SMS, 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. Since this time, Storm Daragh¹, a Met Office "named storm" occurred during the days immediately prior to a Planned Maintenance window on 10 December 24. On the 7 December 260,000 customers were without power, with 23,000 still remaining off power by the 10 December² 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 criterion which would need to be met to trigger the deferment of DCC Planned Maintenance event.,

¹ [Met Office: Storm Daragh](#)

² [Storm Darragh updates – Energy Networks Association \(ENA\)](#)

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 '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 SMETS1 migrations.

The Met Office define adverse weather conditions using a number of predictable variables. A Yellow, Amber & Red³ rating system is applied to weather events, calculated against a matrix of predicted impact vs likelihood. The Met Office calculate impact⁴ 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 Maintenance event is set to coincide with an adverse weather event, there is no system in place to decide on whether that Planned Maintenance should proceed; rather, it is within the DCC's discretion. During Storm Daragh, Planned Maintenance proceeded following a request from a Network Party seeking a deferment; some Network Parties report 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 Operators 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 H.8 'Service Management, Self-Service Interface and Service Desk'. Currently, there are no provisions within Section H.8 for the deferral of a Planned Maintenance event where an adverse weather event occurs during the scheduled period. Additionally, clause H8.2 requires the DCC to conduct Maintenance 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.

Additionally, paragraph 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

³ [Met Office weather warnings guide](#)

⁴ [Met Office National Severe Weather Warning Service Impact tables](#)

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 a significant delay.

What is the impact this is having?

Impact on consumers

For consumers affected by an adverse weather event, they may experience significant disruption to their energy supply. This disruption may range from being off-supply for an extended period, to reduced provision of services relating to their supply. Any factor that might hinder the ability of a Network Party to respond to damage to consumer supplies, such as a Planned Maintenance event, may exacerbate impact to consumers.

Impact on Network Parties

The Proposer (A Network Party, acting on behalf of all large Electricity Network Operators) 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 SMSs. 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 Party staff of threat of life with field staff – Should an DCC Planned Maintenance and adverse weather event overlap, the loss of SMS comms 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 may need to be carried out in order to changes to the initial Planned Maintenance. The OPR is defined within the DCC Licence.
- **“Domino Effect” on other Planned Maintenance events:** 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 DCC’s 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. Assessment of the proposal

Areas for assessment

Quantification of Impact

SECAS 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, SECAS 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.

SECAS 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. SECAS 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 SMS communications must be calculated relative to costs incurred from a comparable adverse weather event where SMS communications were viable. This will allow for a more equal determination of cost-benefit.

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.

SECAS 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.

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, SECAS, or some other body of combination thereof.

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.
TABASC	Assess any potential technical impacts as a result of the potential solution.
SSC	Assess any potential technical impacts as a result of the potential solution.
TAG	No input required
PSC	No input required
SMIKI PMA	No input required

Observations from Sub-Committees

Discussions at Change Sub-Committee (CSC)

A question was raised asking if it is not only the Data Service Provider (DSP) and the DCC Service Providers, but also the wider SEC users who are impacted. SECAS 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 SMS functionality due to a Planned Maintenance, and that where this is deferred with short notice, consumer advice has therefore become inaccurate.

The Proposer and SECAS 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 Data Service Provider (DSP) 2, rather than one Service Provider as per the current DSP arrangements. They noted that current architecture is different relative to DSP2; SECAS will take this into consideration. A point was raised by the CSC Chair advising that SECAS 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. SECAS will explore and take note of how the Met Office calculate adverse weather event ratings when considering the solution to this Modification.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	09 June 2025
Presented to CSC for initial comment	17 June 2025
Converted to Modification Proposal	17 June 2025
<i>Presented to TABASC</i>	<i>03 July 2025</i>
<i>Presented to SSC</i>	<i>09 July 2025</i>
<i>Presented to OPSG</i>	<i>28 July 2025</i>

Italics denote planned events that could be subject to change

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
CSC	Change Sub-Committee
DCC	Data Communications Company
ENWL	Electricity Northwest Limited
GSP	Grid Supply Point
Met Office	Meteorological Office
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
SMS	Smart Metering System
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee