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Action:	For Information

MP294 – Review of DCC Maintenance Activities and Temporary Additional Allowance

1. Purpose

The purpose of this paper is to gather views on the changes proposed as part of [MP294 - Review of DCC Maintenance Activities and Temporary Additional Allowance](#).

This document summarises the key points of this Modification Proposal. More information is available in the Modification Report in Appendix A.

1.1 What are the current arrangements?

The DCC is required under the Smart Energy Code (SEC) to maintain DCC Systems to avoid service disruption as much as possible. This includes completing Planned Maintenance and Unplanned Maintenance activities to ensure vital components are running, are up to date, are reliable and secure.

SEC [Section H “DCC Services”](#) and SEC [Section A “Definitions and Interpretation”](#) currently set out provisions related to the maintenance of DCC Systems. This includes definitions and provisions regarding Planned Maintenance and Unplanned Maintenance.

1.2 What is the issue?

Definition of Unplanned Maintenance

Whilst Planned Maintenance is clearly defined within the SEC, the definition of Unplanned Maintenance is ambiguous.

The SEC does not contain detail of what might be considered an allowable reason for instigating Unplanned Maintenance. Consideration should be given to documenting reasonable purposes of instigating Unplanned Maintenance, with the end consumer in mind

Growth of service and new DSP

As the Services delivered by the DCC have grown, so to have the number of Service Providers. In turn the number of components and amount of required change / maintenance has also increased.

The volume of change has increased significantly and by the end of 2024, change volumes reached ~4800/year. This is a 40% increase on 2023 change volumes and almost 60% compared to 2022 volumes.

The SEC allowable volume of Planned Maintenance has not changed during this time period. As the DCC transition from legacy DSP to DSP2, it is reasonable to anticipate a need for additional High Impact Maintenance windows. Whilst different Maintenance activities can be combined or run in parallel to reduce overall outage time, this approach presents additional risk.

The increasing complexity of change means that there is less time available to complete post deployment checks which increases the risk of change related Incidents being experienced.

Maintenance outside of current definitions

Planned and Unplanned Maintenance are Maintenance activities which are likely to impact the provision of Services to Devices associated with at least 100,000 Communications Hubs.

Where Maintenance is required, but this level of Service disruption is not likely, there are no restrictions as to when or how this can be completed and no requirement for the DCC to notify Parties.

Maintenance can be deployed without disruption to Services where resiliency is utilised. However, it is noted that any maintenance activity comes with some level of risk. Where such activity is completed but Parties aren't notified, they remain unaware of the activity.

1.3 What impact is this having?

The following impacts have been cited with regards to the identified issues:

- **Increased risk of Major Incidents:** As change and Maintenance activity volumes increase, including its complexity, the risks associated with that activity also increase. Whilst overall incident volumes and outage durations are trending downwards, change related major incidents have demonstrated an upward trend.
- **Ambiguity surrounding Unplanned Maintenance:** The SEC wording on Unplanned Maintenance, and the absence of any detail relating to when such Maintenance might be acceptable, does not provide confidence to Parties that the intent of the wording is being followed.
- **Maintenance utilising resilience:** Where Maintenance does not meet the definition of Planned or Unplanned, Parties are not provided with any insight into that activity.
- **Impact on consumers:** Increased volumes of Maintenance, and more complex Maintenance, increases the likelihood of change related Incidents which can disrupt services in an unplanned and unnotified manner. The necessity and reasons for deploying Unplanned Maintenance will continue to be disputed.

2. Proposed Solution

The Proposer and Co-Sponsor are currently looking to do the following with regards to DCC Maintenance:

- a full review of the best practise to be followed, and the allowable purposes of using Unplanned Maintenance;
- consider opportunities to manage increasing change volumes in a controlled way until the new Data Service Provider (DSP) 2 is delivered via temporarily additional maintenance; and
- introduce Planned Resilience Maintenance, where Maintenance activity is not expected to impact services to Devices connected to 100,000 or more Communications Hubs.

3. Questions for TABASC

We are seeking the TABASC's input on the following questions:

- Does the TABASC see any issues arising from the implementation of this Modification?
- Is the TABASC aware of any specific requirements required for this Modification?

4. Recommendations

The TABASC is requested to:

- **NOTE** the contents of this paper; and
- **PROVIDE** feedback on the proposed changes.

Talia Lattimore

SECAS Team

26th June 2025

Attachments:

Appendix A: MP294 Modification Report v0.2