SEC
Smart Energy Code

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

Smart Energy Code

MP092

‘New Planned Maintenance Methodology’

Modification Report

Version 0.2

20 July 2020

Corporate member of Plain English Campaign
Committed to clearer communication
592

About this document

This document is a Modification Report. It currently sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

Contents

1. Summary 3
2. Issue 3
3. Solution 5
4. Impacts 5
5. Costs 6
6. Implementation approach 7
7. Assessment of the proposal 7

Appendix 1: Progression timetable 9

Appendix 2: Glossary 9

This document also has two annexes:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex B** contains the full Data Communications Company (DCC) Preliminary Assessment response.

Contact

If you have any questions on this modification, please contact:

Emmanuel Ajayi

020 8132 4134

emmanuel.ajayi@gemserv.com

1. Summary

This proposal has been raised by Darren Robbins from the DCC.

In February 2019, the DCC noted to the SEC Panel that the method for delivering Planned Maintenance releases was sub-optimum. The Panel agreed to a derogation of existing SEC conditions until November 2019 and In April 2019 the DCC began a trial of a new approach regarding the delivery of Planned Maintenance. The new approach required changes to the DCC schedule of Planned Maintenance changes and at what times of day such changes should be implemented. The new approach sought to categorise planned changes as either Low Impact or High Impact, based upon a risk-based methodology. It also amended the timings with which Planned Maintenance was scheduled and implemented.

In January 2020, the SEC Panel granted extension of the derogation for the Planned Maintenance trial; this was to allow sufficient time for changes to be made to the SEC. The new Planned Maintenance risk methodology focused on how to differentiate between a High or Low Impact maintenance period. In order to fully assess changes and to ensure that the correct maintenance window is selected, the DCC used a Change Risk Calculator. The risk methodology involves core services, customer impact and downtime.

In addition, the DCC noted there will be no DCC System change costs required to implement this change moving forward. All SEC Parties will be impacted by this change as the timings for Planned Maintenance will change.

2. Issue

What are the current arrangements?

In February 2019 the DCC noted to the SEC Panel that the method for delivering Planned Maintenance releases was sub-optimum. As such it wished to move to a risk-based approach to help deliver Planned Maintenance releases more efficiently.

Whilst the SEC is silent on the methodology for scoping Planned Maintenance, it does set out when the Maintenance should occur and the timescales around publishing Maintenance schedules (Sections H8.3 and H8.4).

SEC Section H8.3 sets out that the DCC may only undertake Planned Maintenance between 20.00 hours and 08.00 hours, and that the duration of Planned Maintenance should not exceed six hours in any given month. Furthermore, Section H8.4 states the DCC must provide a schedule of Planned Maintenance at least 20 Working Days prior to the start of each month that the Planned Maintenance is due to occur.

What is the issue?

The current Planned Maintenance methodology as set out in the SEC does not differentiate the specific services, nor the business impact of changes, which has several impacts:

- Low impact changes are considered in the same way as complex or high-risk changes. For example, downtime on the Self-Service Interface (SSI) is treated in the same manner as Core Communication Services. The business impact and risks associated with these examples are very different.
- Notice periods are the same regardless of overall business impact. This results in unnecessary delays on low impact, low risk changes.
- The existing lead times also result in significantly extended deployment times on changes. Any alterations to scheduled changes result in significant delays.
- With the specific constraint on downtime and with no differentiation on the impact of change on Users, the result is that very large numbers of changes, both high and low in impact, are implemented in a single change window. This increases complexity and risk, whilst simultaneously constraining the DCC's ability to deliver key changes in a timely manner.
- With a focus on downtime, the result can be that high risk or complex changes where no disruption to the Services is anticipated are not classed as Planned Maintenance and therefore do not get included in the forward schedule of change.

Part of the new approach required amendments to existing rules of when the DCC was to produce a schedule of Planned Maintenance changes and at what times of day such changes should be implemented. The DCC therefore requested the Panel grant a derogation to these rules whilst a six-month trial on the new methodology was carried out.

The Panel agreed to a derogation until November 2019 on the condition that the DCC first present an updated Forward Schedule of Change (FSC) to the Operations Group Sub Committee (OPSG) and that clarity was provided over some of the terminology used. Following discussions at the OPSG a trail of the new Planned Maintenance approach began on 1 April 2019.

The OPSG was to receive monthly reporting on the performance of the trail, with a full review of the trial after three months (July 2019).

Conclusions of the DCC trial

At the October 2019 Panel meeting, the DCC noted the trial was coming to an end and had proved a success, a view supported by feedback at the July OPSG meeting. The DCC requested an extension to the derogation whilst full results of the trial were presented to the OPSG in October and November 2019 and a resulting Modification Proposal to introduce the new approach could be raised.

The Panel granted a further three-month extension whilst the OPSG discussed the results and a modification could be progressed.

The new DCC methodology proposes the introduction of two High Impact and up to six Low Impact Planned Maintenance windows per month. Whilst the Planned Maintenance will continue to take place between 20:00 and 08:00 hours (as per Section H8.3) each Low Impact Planned Maintenance window will have a maximum duration of six hours and High Impact Planned Maintenance will have a total maximum duration of six hours calculated across both windows.

This modification has been raised to implement the new arrangements.

What is the impact this is having?

Many of the changes included in the Maintenance windows are designed to resolve business and operational issues that impact the overall quality of DCC Services, as well as there being many changes specifically requested by the industry as enablers to their business.

3. Solution

Proposed Solution

The new risk-based methodology developed to determine whether the category of the maintenance is High or Low Impact involves multiple factors. The risk methodology involves core services, customer impact and downtime. Core services relates to anything affected that supports a service or affects the installation and commission of smart meters e.g. provision of meter readings or anything that affects service traffic. Furthermore, customer impact assesses impact on all customers, whilst the downtime refers to whether the planned maintenance spans less or more than 10 minutes.

The DCC proposes the introduction of up to two High Impact and up to six Low Impact Planned Maintenance windows per month. High Impact Planned Maintenance will have a total maximum duration of six hours calculated across both windows. Each Low Impact Planned Maintenance window will have a maximum duration of six hours. High Impact changes will have a minimum lead time of 20 Working Days and Low Impact changes a minimum lead time of 10 Working Days.

The DCC will continue to publish the schedule of Planned Maintenance (as per Section H8.4) and issue an email notification to all Parties 20 Working Days ahead of the month in which Planned Maintenance will occur. This notification will set out when the scheduled windows are for High Impact and Low Impact changes and provide high level information on what Parties should expect in each window. If additional Low Impact Planned Maintenance windows are required beyond this notice, a revised notice will be issued to Parties.

4. Impacts

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

SEC Parties

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

Maintenance on DCC Systems affects all SEC Parties as above. Whilst the Maintenance affects DCC Systems there are no changes to DCC Systems, only to the maintenance of them and the corresponding downtime. All Parties will be affected by DCC System downtime.

DCC System

There are no overall impacts on DCC System in this modification but contract changes with Communication Service Providers are required.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section H 'DCC Services'
- Schedule A 'Definitions and Interpretations'
- Appendix AL 'SMETS1 Transition and Migration Approach Document'

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

Consumers

There is no additional impact on consumers than current arrangements, as none of the current arrangements for downtime has been amended.

Other industry Codes

This modification has no impact on other industry codes.

Greenhouse gas emissions

This modification has no impact on greenhouse gas emissions.

5. Costs

DCC costs

There are no costs on the DCC to implement this modification,

Breakdown of DCC implementation costs	
Activity	**Cost**
Design, Build and Pre-Integration Testing (PIT)	£0
Systems Integration Testing (SIT)	£0
User Integration Testing (UIT)	£0

Breakdown of DCC implementation costs	
Activity	**Cost**
Implement to Live	£0

More information can be found in the DCC Preliminary Assessment response in Annex B.

SECAS costs

The estimated Smart Energy Code Administrator and Secretariat (SECAS) implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. The activities needed to be undertaken for this are:

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

SEC Party costs

There are no anticipated costs to SEC Parties to implement this modification.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **25 February 2021** (February 2021 SEC Release) if a decision to approve is received on or before 11 February 2021; or
- **24 June 2021** (June 2021 SEC Release) if a decision to approve is received after 11 February 2021 but on or before 10 June 2021.

This is a document only change and it has no impact on DCC Systems; it is simply aligning the SEC to the current DCC processes which are being used in the trial, however contractual changes are required. The February 2021 SEC Release is the earliest SEC Release this modification could be included in.

7. Assessment of the proposal

Solution development

The derogation and trial period for these provisions was initially six months, ending on November 2019, this was later extended for a further three months until February 2020. The DCC has advised the Planned Maintenance trial period conducted has become an enduring process.

On approval of the derogation period, the Panel requested that the DCC report progress to the OPSG. In July 2019, the DCC reported the trial had been a success and, following a final report to the OPSG, raised a Modification Proposal to formalise the new approach.

During the Working Group the DCC re-established the key objectives of the maintenance trial period to facilitate the solution. The solution aims to improve visibility of changes to SEC Parties, improve quality of changes deployed, improve alignment to demand and focus on business impact rather than solely focusing on the amount of downtime.

The SEC is to be updated to create the concept of High and Low Impact Maintenance windows and detailing the outage duration associated with each.

Support for Change

The OPSG has been supportive of this change following the success reported by DCC during the derogation period. The Working Group was also supportive of this change following discussion of the solution and results of the trial period.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this modification will better facilitate SEC Objective (b)[1] as the new Planned Maintenance methodology allows the DCC to better meet their licence obligations.

[1] Enable the DCC to comply at all times with the objectives of the DCC licence and to discharge the other obligations imposed upon it by the DCC licence.

Appendix 1: Progression timetable

The Refinement Consultation will be issued on the week commencing 20 July 2020. Once issued, the Impact Assessment will be requested at the July Change Board. If approved the approximate return date for the Impact Assessment is 30 working days.

Timetable	
Event/Action	**Date**
Draft Proposal raised	22 Oct 2019
Presented to Change Sub-Committee (CSC) for decision	29 Oct 2019
Panel converts Draft Proposal to Modification Proposal	15 Nov 2019
Preliminary Assessment requested	18 Nov 2019
Preliminary Assessment returned	5 Jun 2020
Modification discussed with Working Group	1 Jul 2020
Refinement Consultation	20 Jul – 7 Aug 2020
Impact Assessment Returned	21 Sep 2020
Modification Report presented to Panel	16 Oct 2020

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
FSC	Forward Schedule of Change
OPSG	Operations Group Sub-Committee
SSI	Self-Service Interface
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat