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MP092 ‘New Planned Maintenance methodology’ Refinement Consultation responses

About this document

This document contains the full [non-confidential] collated responses received to the MP092 Refinement Consultation.

Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	Yes	<p>We agree the solution put forward subject to modified. Generally, speaking this modification should make it easier for the DCC to manage maintenance releases and mean less chance of service disruption to users. The Legal Text should clarify that planned maintenance should not impact end-to-end communications between Users and Devices – in either direction.</p> <p>Current legal text:</p> <p>a) High Impact Planned Maintenance where one or more of the following is disrupted;</p> <ul style="list-style-type: none"> i. end-to-end communications between Users and Communications Hubs; ii. install & commission activities; or iii. previously scheduled SMETS1 migrations. <p>Our proposed modified legal text underlined below would be:</p> <p>a) High Impact Planned Maintenance where one or more of the following is disrupted;</p> <ul style="list-style-type: none"> i. end-to-end communications between Users and Communications Hubs in either direction; ii. install & commission activities; or iii. previously scheduled SMETS1 migrations.

Question 1			
Respondent	Category	Response	Rationale
			We would also suggest that there needs to be a mechanism for DCC to capture within the Performance Measurement Report (PMR) any instances of Low Impact Maintenance which unexpectedly results in disruption of end-to-end communications between Users and Communication Hub
Symbio Energy Ltd.	Small Supplier	Yes	Symbio Energy is fine with methodology for Planned Maintenance
Western Power Distribution	Network Party	Yes	We agree with the proposed solution.
Utilita	Large Supplier	No	<p>Utilita cannot support MP092 as a proposed solution. Utilita is predominantly a prepay supplier, and therefore cannot support a mod that carries a significant risk of restricting our customers' ability to top up their meters when needed. Although we understand the intention of introducing 'Low' and 'High' maintenance categories to illustrate the type of impact to services, we cannot agree with the proposed legal text changes in Section A 'Planned Maintenance' and H8.3 c and d, for the following reasons:</p> <ol style="list-style-type: none"> Timing and windows proposed: <ul style="list-style-type: none"> There is no clear rationale for extending the time allowed for planned maintenance by such a significant amount from 4 hrs (limited only to SSI) to 6hrs/month for all High Impact Maintenance = 50% increase; and other Maintenance from 6 hrs/month to Low Impact Maintenance 6 windows/month max 6 hrs each = 36 hours = 500% increase). In total, maximum of 6 hours rises to 42 hours. The trial outcomes do not clearly show the justification for such a significant increase in time allowed. As a DCC user we want to see less outages. Any outage, at any time impacts prepay customers because they top up at all times of the day and night. This proposal is directly contrary to the desired direction of travel.

Question 1			
Respondent	Category	Response	Rationale
			<p>2. Consequences of extending maintenance windows/timing on the associated costs of running DCC systems, i.e. compensation for downtime for DCC Users:</p> <ul style="list-style-type: none"> - More downtime (planned and unplanned) will mean that there is increased risk of customers (potentially vulnerable) being unable to top up during these times, among other important activities. - Changing the legal text to allow for an increase in both the hours and windows of planned maintenance leaves our prepay customers exposed to additional risks of going off supply. This proposal could increase the risk of customers being affect by system downtime by a factor of 5 compared to pre-trial (current) windows/timings provided for under the SEC. - This proposal is going to have direct costs of managing consumer expectations and how “smart” their smart meter is. These costs are entirely borne by the supplier. This change is not equitable in it’s solution. <p>3. Current drafting lacks transparency around the potential for disruptions of Low Impact Maintenance:</p> <ul style="list-style-type: none"> - Although the legal text indicates low risk of disruption, SEC parties should be made aware of any potential risk of disruption associated with Low Impact Maintenance. We are given a notice period of 10 days for Low Impact Maintenance; from our perspective this is an indication that disruption is still possible. Therefore, a protocol should be included in the legal text, applicable in the case of system disruption caused by Low Impact Maintenance. The protocol must tell suppliers what type of disruption is to be expected. - The whole phrase ‘which will disrupt or poses a Material Risk of disruption’ must remain within the definition of Planned Maintenance. Removing the ‘or poses a Material

Question 1			
Respondent	Category	Response	Rationale
			<p>Risk of disruption' part as is proposed means that any maintenance which does not for certain "disrupt" the Services will be, by default, classified as Unplanned Maintenance. The text needs to cover the scenario where there is Planned Maintenance but with a risk (not certainty) of disruption.</p> <p>4. Current drafting lacks a mechanism for DCC Users to challenge the DCC assumption of Low or High Impact:</p> <ul style="list-style-type: none"> - We would like to see and understand how DCC defines success in recent trials of the Low/High Impact classification, especially conducted over the last few months. While there has been a report on the successes of the trial, we note this was conducted in 2019. There will inevitably continue to be increasing Maintenance (driven via various routes such as an increase in traffic). As such, while the report contents are useful, there needs to be a review of the successes in light of the changes in landscape. This should be included in the PA for SEC parties, so that we can fully assess if DCC's success measures agree with the views of DCC Users. Answers around the timing and windows for High and Low impact maintenance should be compared with information prior to the trial. Have these trials stayed within the windows as proposed in this mod? <p>Therefore, until it is clear what the benefits for customers and SEC Parties are, we suggest this mod progresses no further.</p>
OVO	Large Supplier	Yes	<p>Although we agree with the changes being implemented and have been involved in the trail that has been ongoing, we would like to flag that commencing any maintenance that affects DUIS should not be starting at 20.00 as this directly impacts Prepayment customers. This has been notified to the DCC on numerous occasions and the principle of any maintenance</p>

Question 1			
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			<p>is Customer top up impact should be completely avoided. This is not the case and those involved with implementing the planned maintenance do not consider this as a factor. This change does not mention this as a consideration at all and it should be. The manner of the solution is not the issue though.</p> <p>High Impact reflects end to end communications between Service Users and CHs. It does not factor the customer that may be making those communications and the purpose. So the continued commencement at 20.00 is 'sub optimum' to our customers.</p>
EDF	Large Supplier	Yes	We agree with the proposed solution. It sets out a more nuanced approach to Planned Maintenance which is more appropriate than the current arrangements set out in the SEC, as proven by the trial of the proposed new process.

Question 2: Will there be any impact on your organisation to implement MP092?

Question 2			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	No comment	No comment
Symbio Energy Ltd.	Small Supplier	No	-
Western Power Distribution	Network Party	Yes	We will have a consistent and clear understanding of the types and times of maintenance that the DCC will undertake and will be better able to manage our systems and processes accordingly.
Utilita	Large Supplier	Yes	<p>As mentioned in Question 1:</p> <p>Implementing MP092 will have further impacts:</p> <ol style="list-style-type: none"> Consequences to prepay consumers topping up, e.g. lack of top up capability during the Maintenance windows. This has a detrimental impact on prepay customers who will not have their top up credited to their meter. This runs the risk of customer contact or loss of confidence in their smart meter. Costs to suppliers to try and manage the ensuing messaging to customers at times of material risk, potentially on a 6-times a month basis when their meters will not be smart. This is made more difficult because DCC does not provide effective transparency of the likely risk or the level of disruption. Constantly having to message will have negative reputational, monetary, and logistical impacts on our business. Consequences to installation and commission process – which also can have negative impacts on the consumer as another visit may need to be scheduled last minute;

Question 2			
Respondent	Category	Response	Rationale
OVO	Large Supplier	Yes	Yes, although there are positives in the new methodology it does not consider User impacts and is focused on DCC ability to define impact. WE will still be impacted by certain systems being down when those changes impact our customers. This will not improve or address that.
EDF	Large Supplier	No	The proposed solution maintains the amount of time for which the core systems/processes will not be available as a result of Planned Maintenance so there should be no impact on us as a result. This is, however, on the assumption that Planned Maintenance is assessed appropriately and that items designated as Low Impact Planned Maintenance will not disrupt core services.

Question 3: Will your organisation incur any costs in implementing MP092?

Question 3			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	No comment	No comment
Symbio Energy Ltd.	Small Supplier	No	-
Western Power Distribution	Network Party	No	-
Utilita	Large Supplier	Yes	<p>The effects of proposed legal text changes in H8.3 c and d. will have a detrimental impact to the consumers, especially prepay.</p> <p>There will also be a detrimental impact to Suppliers who must manage consumer expectations during these maintenance times.</p> <p>It is worth noting that MP109 proposes using the SSI as a standard means of communication, with up to 36 hours of planned maintenance windows per month which could impact the SSI; this modification makes subsequent mods, like MP109, significantly less attractive.</p> <p>As stated above DCC has not provided enough information to do a thorough Impact Assessment of costs.</p>
OVO	Large Supplier	No	As the issues causing us cost still remain, this will not incur further cost to us but will not remove costs on how we react to this work being done.
EDF	Large Supplier	No	-

Question 4: Do you believe that MP092 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	Yes	Subject to our response to Q1 and our proposed modifications
Symbio Energy Ltd.	Small Supplier	Yes	This will help to prioritize the planned maintenance.
Western Power Distribution	Network Party	Yes	We agree that this modification will better facilitate SEC Objective (b) by enabling the DCC to better meet their licence obligations.
Utilita	Large Supplier	No	SEC objective B states “efficiently discharge the other obligations imposed upon it by the DCC Licence”. To work efficiently, the DCC should strive towards reducing downtime rather than changing its legal obligation of providing a reliable interface.
OVO	Large Supplier	Yes	At the highest level, it meets SEC Objective (b).
EDF	Large Supplier	Yes	We agree that M092 will better facilitate SEC Objective (b) as it will enable the DC to better meet their obligations around Planned Maintenance.

Question 5: Noting the costs and benefits of this modification, do you believe MP092 should be approved?

Question 5			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	Yes	Subject to our response to Q1 and our proposed modifications
Symbio Energy Ltd.	Small Supplier	Yes	If planned maintenance help to avoid any disruption to the provision of the DCC services, then yes, the MP092 should be approved.
Western Power Distribution	Network Party	Yes	-
Utilita	Large Supplier	No	<p>We see no benefits if this was to be approved in its current state.</p> <p>Overall, MP092 increases the ability of the DCC to allocate Planned Maintenance periods from 6 hours to 42 hours; the associated risk of disruption thereby increases, too, which could be detrimental to consumers, especially prepay, compared to the current legal text and Maintenance window allowance pre-trial. In turn, this leads to cost and risk for Suppliers. Indeed, it is unclear what the benefits of progressing with the extension of Maintenance windows is.</p> <p>Whilst we see a rationale for splitting maintenance categories to High or Low impact if the justification for choosing either High or Low was always communicated clearly to DCC Users. However, there is no mechanism to challenge the decisions.</p>
OVO	Large Supplier	Yes	We do although we'd like DCC to address the customer impacts of the way they actually carry out planned maintenance.
EDF	Large Supplier	Yes	-

Question 6: How long from the point of approval would your organisation need to implement MP092?

Question 6			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	No comment	No comment
Symbio Energy Ltd.	Small Supplier	Within two months	We will identify the high and low impact areas. If there are any schedulers setup already within the Planned Maintenance time between 20:00 and 08:00 hours, we will change our systems schedulers. We will make sure the no service request will send during the maintenance time frame.
Western Power Distribution	Network Party	N/A	-
Utilita	Large Supplier	N/A	-
OVO	Large Supplier	N/A	This is already in place. DCC are following this approach and we've adapted to it.
EDF	Large Supplier	N/A	As the trial process is already in operation on an ongoing basis we would not need any lead time to implement this change.

Question 7: Do you agree with the proposed implementation approach?

Question 7			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	Yes	Subject to our response to Q1 and our proposed modifications
Symbio Energy Ltd.	Small Supplier	Yes	Yes, Symbio Energy agree with the proposed implementation.
Western Power Distribution	Network Party	Yes	-
Utilita	Large Supplier	No	For the reasons addressed in question 1
OVO	Large Supplier	N/A	There is no approach to implementing this, it is already in place and only a document change. It is not possible to disagree with it.
EDF	Large Supplier	Yes	We agree that this should be targeted for the February 2021 release; however it is disappointing that this can't be included in the November 2020 release.

Question 8: Do you agree that the legal text will deliver MP092?

Question 8			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	Yes	Subject to our response to Q1 and our proposed modifications
Symbio Energy Ltd.	Small Supplier	Yes	Yes, Symbio Energy agree with the legal text with current version of 2.0.
Western Power Distribution	Network Party	No	We believe that the way that the legal text is drafted for defining a High Impact Planned Maintenance doesn't clearly allow for changes that might impact a User but without necessarily impacting install and commission or end to end communications. We believe that High Impact also needs to include any changes that will have an impact on the User.
Utilita	Large Supplier	We do not agree with the proposed solution for MP092.	<p>In the legal text, the proposed changes in H8.3 c and d allow for hours of downtime to increase and more windows for planned maintenance. There is no protection for customers during these times and likelihood for unplanned maintenance to reduced is vacant in this modification.</p> <p>The proposed legal text</p> <ol style="list-style-type: none"> 1. increases the windows and amount of maintenance allowed. 2. the amendment of the phrase "which will disrupt or poses a Material Risk of disruption" means that unless DCC are certain that the Maintenance will disrupt, they must classify the Maintenance as Unplanned. It can only be Planned if it "will" disrupt. This means DCC will have to classify Maintenance that may cause disruption as Unplanned (Please see question 5).
OVO	Large Supplier	Yes	n/a

Question 8			
Respondent	Category	Response	Rationale
EDF	Large Supplier	Yes	We have not identified any issues with the legal text.

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP092 is implemented?

Question 9			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	No comment	No comment
Symbio Energy Ltd.	Small Supplier	No	-
Western Power Distribution	Network Party	No Comment	-
Utilita	Large Supplier	Yes	Impact to consumers is negative as this is likely to lead to further system downtime (please see question 5 and 8). There is also little evidence this mod is needed to resolve any problem. Finally, there is no benefits given so it is unclear why this mod is being proposed.
OVO	Large Supplier	No	No, as this change is not looking to benefit consumers as the elements that impact them have not been considered. There is nothing in any of the Modification documentation considering that impact in how our customers behave being addressed. If they were there would be measures factoring that.
EDF	Large Supplier	No	This change will not have a direct impact on consumers as the amount of potential 'down time' allowed within the SEC, which has a direct impact on consumers, will stay the same.

Question 10: Please provide any further comments you may have

Question 10		
Respondent	Category	Comments
Electricity North West Limited	Network Party	No comment
Symbio Energy Ltd.	Small Supplier	-
Western Power Distribution	Network Party	-
Utilita	Large Supplier	The risk for consumers (especially those that are PPM) has not been addressed transparently. In the modification report V0.2 it is says that “There is no additional impact on consumers than current arrangements, as none of the current arrangements for downtime has been amended” yet proposed changes to the legal text in H8.3 c and d would contradict this, as allowed downtime is increasing from the initial times highlighted in H8.3 (b) (if risky maintenance is not under scrutiny anymore, as mentioned above in Question 8). This impact should be clearly highlighted so that all SEC parties understand the potential implications of this Mod
OVO	Large Supplier	None.
EDF	Large Supplier	-