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.

MP092 'New Planned Maintenance Methodology'

Conclusions Report – version 0.1

About this document

This document summarises the responses received to the Modification Report Consultation.

Summary of conclusions

Modification Report Consultation

Five responses were received to the Modification Report Consultation. Three respondents believed the modification should be approved. One respondent believed the modification should be rejected, whilst the other respondent abstained. four of the five respondents considered the modification better facilitated SEC Objective (b)[1].

[1]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

Modification Report Consultation responses

Summary of responses

Several comments and queries were raised by respondents in the Modification Report Consultation. This section summarises these queries and the responses received from the DCC. SECAS will continue to follow up on these queries and will provide any further updates to the Change Board in the meeting.

Views in favour of approving MP092

All three respondents who believed the modification should be approved agreed that it supports SEC Objective (b).

One respondent agreed that the solution of this proposal should make it easier for the Data Communications Company (DCC) to manage maintenance releases, whilst reducing opportunities for service disruption to Users. In addition, the respondent was content that the DCC has considered and agreed their proposed changes to the legal text during the last consultation. The legal text change proposed was to amend and clarify that planned maintenance should not impact end-to-end communications between Users and Devices “in either direction”.

The respondent however disagreed with the DCC’s response to their suggestion in the Refinement Consultation. The respondent’s recommendation was the need for a mechanism in which the DCC 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 Communications Hub. The respondent noted that the DCC advised this recommendation as being out of scope and could be considered as a change to the PMR in another modification. They suggested that this recommendation be considered as within scope of this modification.

The DCC responded advising that in the event of an unexpected impact from a Low Impact Maintenance window, this would be reflected in the current PMR regime. This would mean Availability measures would be impacted. In the event on an unexpected error, this would lead to a formal post change review, where lessons can be learned going forward. This is fed directly into Service Provider monthly reviews by the DCC Supplier Service Management team. The DCC believes the PMR does not need to be referenced under this modification, as any unexpected impact on availability would be captured by existing PMR reporting.

The other respondent in support of MP092 noted this issue does not consider the impact to prepayment consumers as ‘high’. The respondent expanded that the DCC performing any form of maintenance, especially to any process or system that affects prepayment top ups, should be regarded as High Impact. The DCC responded to this point by noting that the impact on prepayment consumers has not changed with this modification. This is because Low Impact windows do not impact prepayment customers, and that services that manage service request traffic across the DCC network will continue during these windows.

Views in favour of rejecting MP092

The respondent who recommended rejection noted that they did see potential benefits of this modification, as the change could provide a consistent and clear understanding of the types and times of maintenance that the DCC will undertake and will allow Users to better manage their systems and

processes accordingly. The respondent however stated their concern that not all User impacting changes have been explicitly pointed out as High Impact. They also expanded noting they believe that 'High Impact' also needs to include any changes that will have any impact on the User.

Furthermore, the respondent felt that their comment from the Refinement Consultation regarding the legal text has not been addressed. The DCC expanded on its previous response in the Refinement Consultation by advising that the modification states that the User functions impacted during High Impact maintenance are end-to-end communications, Industrial & Commercial and SMETS1 migrations, which are the most critical functions. Other User functions may be impacted during Low Impact windows, however not the critical functions. Furthermore, any changes that require Users to amend their back-end systems or processes will only be performed during High Impact windows, except for changes to Self-Service Interface (SSI)

The respondent concluded that although they are supportive of this change, they still believe that the DCC should be encouraged to reduce system downtime, even aiming for a high availability zero downtime system. The DCC responded relaying that the main driver behind this modification was to de-risk the current situation where all changes have to be performed with a single six-hour maintenance window. This is achieved by spreading changes out over High and Low Impact windows. User impacting changes are therefore spread between the two different types of windows, but the changes that most impact Users are restricted to the High Impact windows as described in the legal text. Putting all User impacting changes within High Impact windows would essentially negate this purpose of this modification.

Other views

The respondent who abstained noted they understand the purpose of the modification in defining 'High and Low Impact Planned Maintenance' but had outstanding concerns with this modification. They expanded that while many of their issues have been discussed since the Refinement Consultation with the DCC, they believe this modification still has fundamental issues and consequently are unable to support the changes to SEC Sections A and H.

The respondent advised they are abstaining for the following reasons:

1. There is no clear benefit for the consumer and DCC Users (e.g. no improved timings for system downtime);
2. There is a lack of assurance on the consumer impact of Low Impact Planned Maintenance; and
3. Two windows for 'High Impact Planned Maintenance' means DCC Users will need to inform their customers more regularly.

The respondent believed this modification is going in the wrong direction as they believe maintenance times will overall increase. By increasing the number of windows allowed in Planned Maintenance, this will result in further communication needing to be sent by DCC Users to inform their customers. The respondent believes this will be an added strain on DCC Users and increase inconvenience for consumers. They also explained that, whilst Low Impact Planned Maintenance should not impact services for their customers, they felt there is no assurance from the DCC. Therefore, they concluded they cannot support the new maintenance plans to be included into the SEC .

The DCC responded to the three main points raised by the respondent by advising:

1. Since the start of the planned maintenance trial, the DCC has demonstrated improved success rates, and a significant reduction in incidents caused due to deployments. This is

significant as Incidents may cause more impact to Users. The success rate was 99.44% in December 2020. In January 2018, the success rate was 25%.

2. There is no consumer impact from Low Impact windows. Impact is limited to back-end systems. No Service Request Traffic is disrupted in Low Impact windows.
3. Currently the SEC permits the DCC up to six hours of planned maintenance per month; how the DCC uses the outage time is not defined. The DCC could request more windows if it was able to keep within the six permitted hours. However, this is a future proofing mechanism that will allow DCC to utilise two high impact windows (at three hours each), when the infrastructure is in a place to support this. The purpose is to limit the number of High Impact windows permissible each month.

The respondent acknowledged the DCC's reasons for defining the number of windows allowed in Planned Maintenance, but was concerned that increasing the number of windows will result in further communication needing to be sent by DCC Users to inform their customers. In the case of 'High Impact Planned Maintenance,' rather than just communication for one downtime planned per month, this will need to increase where there are two windows used in a given month. This will be an added strain on DCC Users and increase inconvenience for consumers. Although the total amount of downtime will remain unchanged, the perception from consumers will be that this time has doubled. Prepayment consumers top-up at all times, and therefore any downtime will impact these customers, meaning the Supplier will also need to take further action for each window.

The DCC responded by advising that upcoming changes are visible on SSI in real time. In addition, all maintenance windows are communicated in advance. During implementation, deployment notifications are issued.