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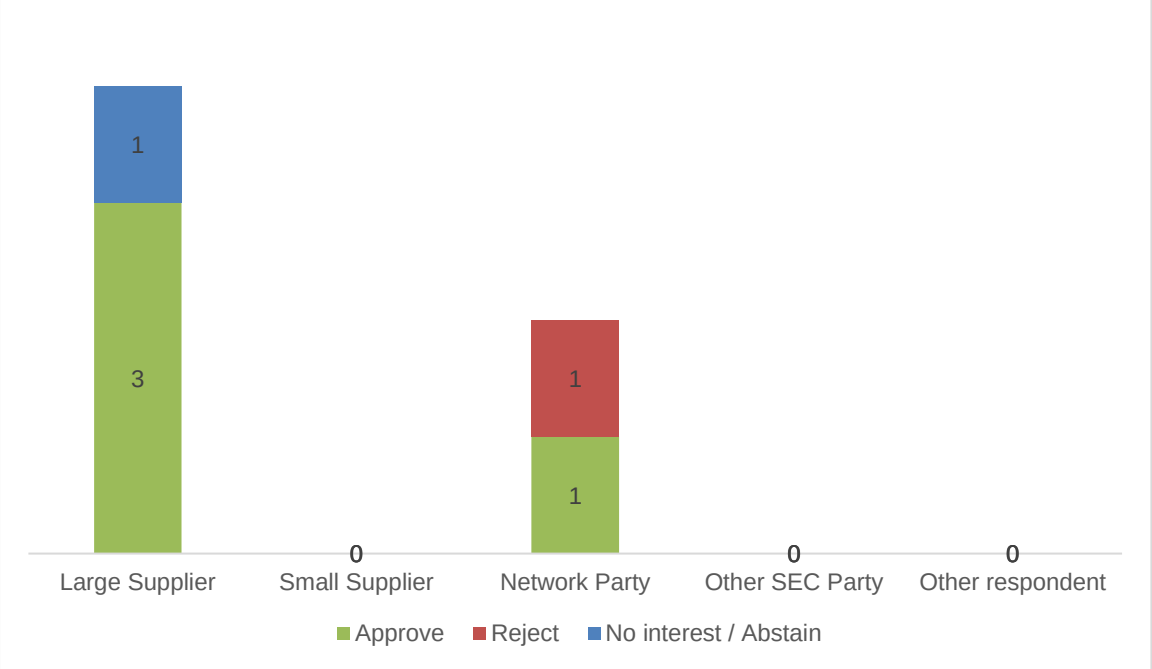
MP092 'New Planned Maintenance Methodology'

Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP092 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP092 should be approved?

Question 1			
Respondent	**Category**	**Response**	**Rationale**
Electricity North West Limited	Network Party	Approve	We agree the solution as this proposal should make it easier for the DCC to manage maintenance releases and mean less chance of service disruption to users subject to our request regarding the PMR set out below. We are pleased the DCC have taken on board and agreed our proposed changes to the legal text during the last consultation and have amended to clarify that planned maintenance should not impact end-to-end communications between Users and Devices “in either direction”. However, we disagree with the DCC that our suggestion 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 – as being out of scope and could be considered as a change to the PMR in another modification. We request that the working group consider this change as part of this modification.
Western Power Distribution	Network Party	Reject	Whilst we believe that this modification will potentially help ensure we have a consistent and clear understanding of the types and times of maintenance that the DCC will undertake and will allow us to better manage our systems and processes accordingly, we are concerned that not all User impacting changes have been explicitly called out as High Impact.
OVO	Large Supplier	Approve	We believe this aligns to the SEC Objectives set out in the Modification Report.

Question 1			
Respondent	**Category**	**Response**	**Rationale**
Utilita	Large Supplier	Abstain	Although we understand the purpose of the modification in defining 'High and Low Impact Planned Maintenance', Utilita currently has outstanding concerns with this modification. While many of our issues have been discussed since the Refinement Consultation, we believe this modification still has fundamental issues which means we are unable to support the changes to the baseline legal text in SEC Section A and H. Utilita understands a solution is required. This mod achieves SEC Objective (b), but we believe MP092 could negatively impact Energy Consumers and DCC Users which does not compliment SEC Objectives (a) and (c). Therefore, Utilita is abstaining for the following reasons: 1. No clear benefit for the Energy Consumer and DCC Users (e.g., no improved timings for system downtime); 2. 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 Energy Consumers more regularly. We believe MP092 lacks any sort of improvements toward creating a solution of reduced downtime for our Energy Consumers. Highlighted in previous consultation responses, prepayment consumers have a live interaction with their meter, meaning any likely risk of downtime has serious consequences for these consumers. This 'New Planned Maintenance Methodology' should strike a balance between the interest of Energy Consumers, DCC Users, and The DCC to achieve the least disruption possible for each stakeholder. In our opinion, this modification is going in the wrong direction as maintenance times will overall increase. Therefore, the consumer impact will either remain the same (same hours for 'High Impact Planned Maintenance' remains unchanged) or potentially get worse (added risk of 'Low Impact Planned Maintenance'). While we appreciate that 'Low Impact Planned

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			Maintenance' by its definition should not impact services for our Energy Consumers, there is no assurance from the DCC, therefore we cannot support these new maintenance plans to be included into the SEC section A and H. Finally, while we understand the DCC's reasons for defining the number of windows allowed in Planned Maintenance, increasing the number of windows will result in further communication needing to be sent by DCC Users to inform their Energy Consumers. 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 Energy Consumers. Although the total amount of downtime will remain, the perception from Energy Consumers will be that this time has doubled. Prepayment consumers top-up at all times therefore any downtime will impact customers therefore the supplier will also need to take further action for each window.
EDF	Large Supplier	Approve	MP092 supports SEC Objective B to enable the DCC 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;
ScottishPower Energy Retail Ltd	Large Supplier	Approve	We believe this MOD will better facilitate Objectives (a), (b) and (c)

Question 2: Please provide any further comments you may have

Question 2		
Respondent	**Category**	**Comments**
Electricity North West Limited	Network Party	None
Western Power Distribution	Network Party	We don't agree that our comment from the Refinement Consultation regarding the legal text has been addressed in the MRC. 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 any impact on the User. Whilst we understand that the *expectation* is that changes that impact a user would be High Impact, we would feel more comfortable if this was detailed within the legal text. Finally, although we are supportive of this change we still believe that the DCC should be encouraged to reduce system downtime, even aiming for a high availability zero downtime system.
OVO	Large Supplier	We still have issues where this modification does not consider impact to Prepayment customers a being HIGH. DCC performing any form of maintenance, especially to ANY process or system that affects Top Ups and the like, is HIGH impact. DCC understanding that concern is not the point being made. DCC is always reminding industry of their commitment to prepayment customers. We'd like to see that reflected in the maintenance behaviour.
Utilita	Large Supplier	There are discrepancies with the proposed text changes for Planned Maintenance in the TMAD (Appendix AL) as these changes do not align with the proposed changes in the legal text of SEC Section A and H. For example:

Question 2		
Respondent	**Category**	**Comments**
		• The proposed SEC Section A text highlights material risk and 'services in relation to Devices associated with Communications Hubs' – this has been removed from Appendix AL of the TMAD • The TMAD states ten working days' notice but does not highlight the difference between High and Low Impact Planned Maintenance which is proposed in SEC Section A and H.
EDF	Large Supplier	No further comments
ScottishPower Energy Retail Ltd	Large Supplier	N/A