SEC
Smart Energy Code

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Smart Energy Code

DP166

‘Adverse Weather Planned Maintenance Process’

Modification Report

Version 0.3

20 July 2021

Corporate member of Plain English Campaign
Committed to clearer communication
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About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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1. Summary

This proposal has been raised by Darren Robbins from the Data Communications Company (DCC).

The DCC undertakes regular Planned Maintenance on their systems to deliver change and undertake other regular maintenance activities to ensure the efficient operation of their services. Currently there is no defined process that enables the DCC to postpone High Impact Planned Maintenance activities due to adverse weather conditions. Although there have been no instances where activities as part of a DCC Planned Maintenance window has resulted in loss of DCC Services during a period of adverse weather, this has been seen as a risk to the consumer who will be impacted in the event of a DCC Service outage.

The DCC would like the capability to postpone these activities to reduce the risk of impacting consumers, and for those works to be rescheduled at the earliest convenience without them being treated as Unplanned Maintenance. The DCC is currently conducting a trial for this process under derogation from the SEC Panel. This trial began in January 2021 and is scheduled to complete in September 2021.

2. Issue

What are the current arrangements?

Currently, the DCC's Planned Maintenance work is split into two categories: Low Impact Planned Maintenance and High Impact Planned Maintenance. High Impact Planned Maintenance is defined in the SEC as where one or more of the following is disrupted:

i. end-to-end communications between Users and Communications Hubs in either direction;

ii. install & commission activities; or

iii. previously scheduled Smart Metering Equipment Technical Specification (SMETS) 1 migrations.

If there is an adverse weather forecast which coincides with a scheduled High Impact Planned Maintenance Window, the DCC currently has no mechanism for delaying the Planned Maintenance activity and therefore would continue with deployment of services. This creates an unnecessary risk of affecting consumers associated with that maintenance window during periods of adverse weather.

What is the issue?

Adverse Weather processes

Many SEC Parties (predominantly Suppliers and Distribution Network Operators) have measures in place to support their consumers during adverse weather conditions reported by the Meteorological Office, so this type of mitigation is common practice. However, the DCC does not have a similar agreed process for postponing previously approved Planned Maintenance activities.

This creates an unnecessary risk for consumers, who might be affected in the event of an outage during periods of adverse weather. For example, if there is an interruption to end-to-end

communications, then a consumer may be unable to activate a prepayment top up, leaving them without supply in a period of adverse weather.

Rescheduling Planned Maintenance activities

For the DCC to develop an efficient postponement process for adverse weather, the activities that would be postponed need to be able to be rescheduled as close as possible to the original window. This is to reduce the impacts on other DCC processes, such as testing and other Planned Maintenance activities, and on SEC Parties who are expecting changes to be made.

SEC Section H8.4A states that "*where an additional Planned Maintenance is required beyond that set out pursuant to Section H8.4, the DCC shall revise and reissue the schedule of Planned Maintenance:*

a) at least 10 Working Days in advance of any additional Low Impact Planned Maintenance; and

b) at least 20 Working Days in advance of any additional High Impact Planned Maintenance."

This means that if a High Impact Planned Maintenance window was to be postponed, the DCC would not be able to re-plan the works for a further 20 working days or would have to treat the outage as Unplanned Maintenance. Any Unplanned Maintenance activity has a direct impact on the DCC's Operational Performance Regime (OPR) reporting for service availability, which is financially incentivised.

DCC Trial

The DCC is currently undertaking a trial of a solution that resolves this issue. The DCC worked with the Operations Group (OPSG), inviting views from members to develop a process in consultation with them. The process is invoked only when there are amber or red weather warnings from the Meteorological Office that coincide with the Planned Maintenance window. There are two fallback dates for each window, the first 48 hours later, and the second seven days later. The decision to invoke the process can be taken up to a week in advance, more likely to be 48 hours in advance. In some instances, the decision may be taken minutes prior to a planned maintenance activity being started.

The trial began in January 2021 under derogation from the SEC Panel and is scheduled to complete in September 2021.

What is the impact this is having?

The lack of a process to postpone Planned Maintenance in the event of adverse weather is creating unnecessary risk to DCC Services, consumers, and the SEC Parties whose processes rely on DCC Services.

SEC Parties (Suppliers and Distribution Network Operators) also have their own risks related to adverse weather and a DCC outage (even if previously planned) may increase the level of risk for consumers.

Impact on consumers

If the DCC does not delay a High Impact Planned Maintenance and this results in an outage to DCC Services, consumers may not have access to certain services, such as being able to use the

prepayment top up functionality on their smart meters. This could result in consumers being off supply and unable to top up to restore supply in a period of adverse weather.

Electricity Network Parties also receive notifications of Power Outage Alerts (POAs). If there is a DCC Service Outage that affects the POA service, the Electricity Network Parties have no way of identifying whether there is a loss of power to the consumer's property.

3. Assessment of the proposal

Observations on the issue

Operations Group

The OPSG Chair requested that the DCC should provide more substantial evidence on what the costs and benefits would be as well as the risks of not implementing this change. The Chair also requested that further work to assess any costs and impacts to Service Users be included. This information will be gathered as part of the Refinement Process for inclusion in this modification's case for change.

The Chair also highlighted that any solution would need to include the proposed fallback dates with the initial maintenance notification 20 working days in advance. The specific process and when to enact it would be either in the SEC or a DCC Controlled document and must include a reporting requirement for any time the process is enacted.

Change Sub-Committee (CSC)

The CSC agreed that the positive and negative impacts on the DCC must be detailed, and any financial impacts must be highlighted. The CSC also noted that the DCC trial was scheduled to end in September 2021 meaning an extension would be required until any implementation date for this modification (if approved).

Appendix 1: Progression timetable

Following feedback from the Operations Group, SECAS will present the Proposal to the CSC for final comment and decision, with the recommendation that it proceeds to the Refinement Process. SECAS will then work with the Proposer to develop the Proposed Solution and subsequent business requirements before presenting to the Working Group.

Timetable	
Event/Action	**Date**
Draft Proposal raised	1 Jun 2021
Presented to CSC for initial comment	29 Jun 2021
Presented to DCC DNO interaction IT Group	20 Jul 2021
Presented to Operations Group for discussion	26 Jul 2021

Timetable	
Event/Action	**Date**
Presented to CSC for final comment and conversion to a Modification Proposal	27 Jul 2021
Proposed Solution and business requirements developed with Proposer	Early Aug 2021
Business requirements discussed at Requirements Workshop	23 Aug 2021
Business requirements discussed with Working Group	1 Sep 2021
DCC Preliminary Assessment requested	Early Sep 2021
Update provided to CSC	28 Sep 2021

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
DNO	Distribution Network Operator
OPR	Operational Performance Regime
OPSG	Operations Group
POA	Power Outage Alerts
SEC	Smart Energy Code
SMETS	Smart Meter Equipment Technical Specifications