



Maintenance Deferral

Consultation on proposed High Impact Planned Maintenance Deferral Policy

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1. Executive Summary

1. We undertake regular Maintenance on our systems to ensure they continue to function as expected and to provide updates and new services. Maintenance is a vital part of our activity to ensure Services remain up to date and secure.
2. High Impact Planned Maintenance is notified in advance to Parties and DCC also publish those dates and times in our Annual Outage Plan. Deployment of High Impact Planned Maintenance causes disruption to Services which our customers plan for in advance.
3. Network Parties are impacted during Maintenance where Power Outage Alerts and Power Restoration Alerts, which provide them with detailed information on power loss, cannot be processed. They have proposed a SEC MP293 to consider methods by which this loss of Service could be managed, particularly where there is a threat of adverse weather where power loss events can be expected to be more widespread.
4. Network Parties have asked DCC to consider the development and implementation of a Maintenance Deferral Policy which would be invoked where the disruption of DCC Services could negatively impact their ability to efficiently manage power loss events. We have worked with Network Parties to draft the Maintenance Deferral Policy published alongside this consultation.
5. We paused that work while we awaited the outcome of SEC MP293. It is now clear that the solution proposed by SEC MP293, if approved, will not be deployed until after the 2026-2027 winter period, and we are therefore revisiting the deferral policy for SEC Party consideration.
6. This consultation summarises the Maintenance Deferral Policy and provides specific details where we seek wider feedback from Parties. Consultation responses will be reviewed by DCC before we consider its implementation.
7. This consultation closes at 17:00 on 25th September 2026, and responses should be sent to consultations@smartdcc.co.uk.

2. Introduction

8. The Data Communications Company (DCC) is Britain's digital energy spine, supporting the transformation of the energy system. DCC is licensed by the Government and regulated by the energy regulator Ofgem to connect smart meters in homes and small businesses across Great Britain to a single Secure, digital network. DCC supports the roll-out and operation of second-generation (SMETS2) smart meters, as well as the operation of existing first-generation (SMETS1) meters on our network.

2.1. DCC Maintenance

9. We undertake regular Maintenance on our systems to ensure they continue to function as expected and to provide updates and new services. Maintenance is a vital part of our activity to ensure Services remain up to date and secure. A large volume of Maintenance is completed without any impact to services, while other Maintenance activity results in Service outage.
10. High Impact Planned Maintenance is that Maintenance which is expected to impaction end to end communication with more than 100,000 Communications Hubs or Install and Commission activity, and these events must be scheduled to complete between the hours of 20:00 and 08:00. We begin the majority of this activity on Tuesday evenings.
11. SEC H8.4 requires DCC to provide notification of Planned Maintenance 20 Working Days prior to the start of the month in which the Maintenance is scheduled. We also work with SEC Operations Sub-Committee to agree our annual outage plan to provide details of planned outage, including Planned Maintenance, for each regulatory year running April to March.

2.2. The Impact of Maintenance on DCC Customers

12. During High Impact Planned Maintenance DCC systems and Services are unavailable and Parties take steps to mitigate the impact of that. For example, the processing of SRVs for meter reads and the sending and receiving of Alerts will not function during this time. For pre-payment consumers they are unable to remotely top up and would need to manually enter their UTRN top-up code to add credit to their meter.
13. Power Outage Alerts (POAs) and Power Restoration Alerts (PRAs) provide Parties with data on consumers at which power loss or power restoration has been experienced. These Alerts are utilised by Network Parties to identify issues in their Network and help them to effectively manage activity to efficiently resolve any supply issues. POAs and PRAs cannot be processed during times of High Impact Planned Maintenance.
14. The unavailability of these Alerts is significantly more impactful to Network Parties where large-scale outage occurs, as may be expected in periods of significant weather events. During such events Networks have informed us that the availability of POA and PRA, and the Service Request "Read Supply Status" (SR 7.4), can help them target their response to more efficiently reconnect consumers, and ensure their operatives are in the field, during dangerous weather, as little as possible.

2.3. SEC MP293

15. SEC MP293¹ was proposed by the Network Party Electricity North West Limited, specifically to consider adverse weather events and the potential solutions to ensure that Network parties can continue to receive POAs and PRAs and manage their Network during periods of Maintenance.

¹ [Deferment of DCC Planned Maintenance during Adverse Weather - Smart Energy Code](#)

16. The modification originally considered two possible options:
 - a. Enhanced availability
 - b. Maintenance deferral
17. Enhanced availability relates to the provision of a sub-set of SRVs and Alerts during times of Planned Maintenance, while Maintenance deferral would implement a process where High Impact Planned Maintenance is deferred during periods where the continuation of DCC Services is deemed critical.
18. The enhanced availability solution is the preferred solution and has been progressed through the Modification.

2.4. The Request for a Maintenance Deferral Policy

19. In 2025 Network parties asked that DCC consider a maintenance deferral policy. We engaged with the Networks to understand their requirements, and with our Service Providers to understand any constraints in deferring Maintenance.
20. In collaboration with Network Parties and our Service Providers we have worked to produce the draft Maintenance Deferral Policy (MDP), published alongside this consultation. The policy includes details on the method by which a Party could apply for Maintenance to be deferred, how that application would be reviewed and further information gathered, and the decision process.
21. We paused progress on this work while we awaited the outcome of SEC MP293. It is now understood that if approved, the solution to SEC MP293 will not be delivered until after the 2026-27 winter period and we are therefore revisiting the maintenance deferral policy and seeking SEC Party feedback.

2.5. Consultation Areas

22. Before implementing the MDP, we would like to understand the views and opinions of all SEC Parties, including on the means of applying for deferral, the decision-making process, the impact of rescheduling Maintenance and the associated costs of implementing the MDP.

2.6. Consultation closure

23. We welcome feedback from Parties on these proposals. This consultation closes at 17:00 25th September 2026, and responses should be sent to consultations@smartdcc.co.uk.

3. Maintenance Deferral Policy

24. We have published the draft MDP alongside this consultation and encourage readers and responders to review the policy, and also note that it has been created as a temporary solution the issues identified in SEC MP293.
25. The aim of the MPD is to ensure that in scenarios where DCC Services are required as a matter of urgency, and where the absence of DCC Services cannot be managed by Parties, that there is an acceptable process to defer Maintenance. Where approved the Maintenance event would be deferred and DCC Services would continue uninterrupted.
26. While the Policy has been created in collaboration with Network Parties, we also consider that wider engagement and feedback is required before it can be implemented.
27. We consider key points of the policy below and seek feedback from Parties before considering the merits of implementing the MDP.

3.1. Temporary Nature of the MDP

28. While SEC MP293 is in development, this Policy is intended to provide a stopgap between now and the Modifications outcome, to alleviate the concerns of Network Parties where Planned Maintenance is scheduled during a period of adverse weather.
29. As such, we have included an expiry for the policy as the 30th April 2027 or the outcome of SEC MP293. This allows the Policy to apply for the 2026 – 2027 storm season while keeping focus on the Modification.
30. The intention of the expiry is that the Policy would cease to apply from the point that the SEC Modification solution is implemented or the modification is rejected or withdrawn. Should SEC MP293 remain in development as we approach April 2027, DCC will consider if this Policy should be extended, and consider what additional costs, if any, this may incur. Any extension would only be implemented following appropriate consultation with Parties.

Question One

Do you agree that if implemented, this policy should be temporary, with the expiry date proposed, while we await the outcome or delivery of SEC MP293? Please give a rationale for your response.

3.2. In Scope Maintenance Activity

31. The MDP will be applied to High Impact Planned Maintenance only. We do not consider it appropriate to apply the policy Low Impact Planned Maintenance or Maintenance that does not result in Service interruption since the availability of SRVs and Alerts remains in place, and deferring that Maintenance will have no additional benefit to Parties.
32. Unplanned Maintenance is also excluded from the MDP since such Maintenance is only deployed in emergency scenarios where there is a threat of a major incident which could impact the availability of DCC Services. In these scenarios we consider that the completion of Maintenance is essential and could result in significantly less Service disruption than the occurrence of a major Incident. It should also be noted that Unplanned Maintenance occurs rarely; between April 2024 and March 2025 Unplanned Maintenance was in deployment for ~6.5 hours; and between April 2025 and February 2026 unplanned maintenance was in deployment for ~5 hours.

Question Two

Do you agree that the MDP should relate to High Impact Planned Maintenance only, and other Maintenance activity should be exempt from deferral? Please give a rationale for your response.

3.3. Rights of Application

33. The MDP allows any SEC Party to make a request for the deferral of Maintenance. Original drafts attempted to define the scenarios in which Maintenance deferral could be applied for and focused on “adverse weather events” or the issue of MET Office weather warnings.
34. However, given further consideration we do not believe that this is required and that the MDP could not fully envisage all scenarios that might benefit from the deferral of Maintenance. The proposed MDP requires that the applicant describe the scenario and its potential impact, including how the absence of DCC Services would be detrimental, and how the presence of DCC Services will help to manage the scenarios impact.
35. This approach ensures that Parties can apply for Maintenance deferral for events that have not been envisaged and focuses on the impact of the event, including how that impact can be mitigated by deferring Maintenance.
36. We consider that the greater level of detail provided on the events potential impact, including any assessment of probability, and how DCC Service availability impacts the management of that event, will allow for full and robust consideration of the application to defer Maintenance.

Question Three

Do you agree the Policy need not dictate scenarios in which an application may be appropriate, and that the applicant for deferral should be required to make their case providing their consideration of the impact? Please give a rationale for your response.

3.4. Decision Making

37. The MDP allows for additional detail to be requested by DCC from the applicant Party, and we would expect the Party to comply with reasonable requests for information in a timely manner. In addition, DCC may seek views from other Parties to understand if they consider there to be a need to defer Maintenance, or if maintenance Deferral might impact them negatively.
38. The final decision on to accept or reject the application for Maintenance deferral would be based on the information provided by the applicant and other Parties, as well as other considerations, including:
 - a. The ability of Service Providers to defer Maintenance within the time available, and redeploy within 48 hours
 - b. Cost implications of Maintenance deferral
 - c. The impact of Maintenance Deferral on future Maintenance deployments and the impact of any delays to future Maintenance Deployments
 - d. The rights and obligations of Service Providers

39. In the absence of any formal SEC governance or process on decision making, and before the implementation of SEC MP293, DCC has agreed to act as decision maker. Note that this is not DCC's preference and we would consider a requirement to stand up, at short notice, a representative industry group from across party types for final decision making to be more appropriate. However, we recognise that decisions on Maintenance deferral may need to be made quickly where there is insufficient time to stand up such a group.

Question Four

Do you consider it appropriate for DCC to act as the decision maker for approving or rejecting an application to defer Maintenance? Please give a rationale for your response.

Question Five

Do you consider that the sources of information and consideration of multiple SEC Parties will allow a reasonable decision to be made regarding accepting or rejecting an application to defer Maintenance? Do you propose any additional sources of information for decision making? Please give a rationale for your response.

3.5. Rescheduling of Planned Maintenance

40. DCC has a prescribed volume of allowable Planned Maintenance each month, unless additional volume is approved by SEC Panel. We must also provide notification of Planned Maintenance 20 working days prior to the start of the month in which it is scheduled.
41. Each Maintenance release builds on the last, often needing to be deployed in a predetermined order, often building up to the deployment of larger programmes and system updates. Where Planned Maintenance is deferred it would not be possible to redeploy as future Planned Maintenance and maintain the schedule of change.
42. To keep the forward schedule of Maintenance unchanged, and to avoid any impact to future releases, deferred Maintenance would be scheduled for 48 hours after the original deployment window. To ensure that the forward schedule of change remains unaffected the deferred Maintenance would be excluded for any future requests for deferral.
43. It should be noted that when implemented during an event that moves through space and time, such as adverse weather, the event could be present during the timing of the deferred deployment of Maintenance. As such the deferral of Maintenance may benefit one Party while causing additional disruption to another. It is anticipated that this detail would be captured during the decision making process with detail provided by Parties other than the applicant.
44. Under current SEC obligations this deferred Maintenance would be notified as Unplanned Maintenance. However, we do not consider that this scenario should be included in the reporting of the volume of Unplanned Maintenance since its cause is outside of DCC control and it would be completed at the request of our customers.

Question Six

Do you support the deferral of Planned Maintenance by 48 hours to ensure the forward schedule of change is unaffected? Please give a rationale for your response.

Question Seven

Do you consider it reasonable to exclude deferred Maintenance from further deferral requests to ensure the forward schedule of change is unaffected? Please give a rationale for your response.

3.6. Costs of Implementation

45. We have completed preliminary investigations on the costs of our Service Providers being able to implement the requirements of this Policy. Since an application to defer Maintenance can be made at short notice our Service providers would need to be capable of deferring any Planned Maintenance event at short notice and have the capability to deploy 48 hours later.
46. The cost to defer Maintenance will be dependent on the Service Providers being requested to defer their activity and could be up to ~£711,000 (seven-hundred and eleven thousand) per deferral.

Question Eight

Do you support DCC incurring these costs in order to be able to implement the Maintenance Deferral Policy? Please give a rationale for your response.

3.7. Policy Implementation

47. We recognise that the proposed Policy may cause disruption to Parties if Planned Maintenance is deferral and such a deferral would need to be weighed against the potential impact to Parties and consumers should the application be approved or rejected.
48. We also recognise that this is a complex scenario where different Parties may have different opinions regarding individual request for Maintenance deferral. DCC would aim to gather input on the advantages and disadvantages of Maintenance deferral from as wide a range of SEC Parties as possible before making a final decision.
- 49.

Question Nine

Do you have any suggested changes, or additional information that you consider should be included in the MDP? Please give a rationale for your response.

Question Ten

Given the details described in this consultation, and the wording of the draft MDP do you consider that it should be implemented? Please give a rationale for your response.

4. Next Steps

50. Following the closure of this consultation, DCC review consultation responses and consider if there is Party support to implement the policy and / or make any modifications to it. We will also engage with SEC Operations Sub-Committee to present details of the proposal and gather further feedback.
51. Following this we will publish our conclusions and confirm if this the MDP is to be implemented.

Question Eleven

Do you have any other comments?

5. How to Respond

52. Please provide responses by 1700 on 25th September 2026 to DCC at consultations@smartdcc.co.uk.
53. Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part, of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to The Department and the Gas and Electricity Markets Authority (the Authority). Information provided to The Department or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If The Department or the Authority receive a request for disclosure of the information we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.
54. If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.