Data Communications Company



Maintenance Deferral

Consultation on proposed High Impact Planned Maintenance Deferral Policy

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1. Executive Summary

1. DCC completes 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 SEC Parties and also published within our Annual Outage Plan. Deployment of High Impact Planned Maintenance causes disruption to Services. DCC recognises that this has impacts, which our customers need to 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 and restoration, cannot be processed. They have proposed 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 produce the Maintenance Deferral Policy, which published alongside this consultation conclusion.

5. We paused that work while we awaited the outcome of SEC MP293. It then became apparent that the solution proposed by SEC MP293 would not be deployed until after the 2026-2027 winter period. We therefore revisited the deferral policy and in August published a consultation for wider SEC Party consideration. We received five responses to the consultation and in October and November completed additional engagement with SEC Operations Sub-Committee.

6. Respondents and SEC operations made some suggestions and requests for change, some of which have been accommodated in the final version of the Policy provided. Other suggestions have not been included in the final document, either due to technical and operational constraints or in recognition that the Policy is temporary in nature and should remain proportionate to its applicability period.

7. In November, through ex-committee communication, the SEC Operations Sub-Committee provided their endorsement of the policy.

8. While the policy wasn't fully supported in terms of its operation, DCC received support of the principals of the Policy. We have made some amendments where possible given the timescales available and keeping the policy proportionate to its temporary nature.

9. Given the support for the policy principals and SEC Operations Sub-Committee endorsement, DCC confirms that the Maintenance Deferral Policy V1.0 published alongside this document in considered implemented and should be followed where any Party wishes to make a request for Maintenance deferral.

2. Introduction

10. 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

11. 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.

12. High Impact Planned Maintenance is Maintenance that is expected to impact end to end communication with more than 100,000 Communications Hubs or Install and Commission activity. These events must be scheduled to complete between the hours of 20:00 and 08:00. We begin most of this activity on Tuesday evenings.

13. 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

14. During High Impact Planned Maintenance, DCC systems and Services can be 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 may not function during this time. For pre-payment consumers they may be unable to remotely top up and would need to manually enter their UTRN top-up code to add credit to their meter.

15. Power Outage Alerts (POAs) and Power Restoration Alerts (PRAs) provide Parties with data on installations 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.

16. 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 adverse weather, as little as possible.

17. Parties use our notifications of Maintenance to plan their own operational actions to manage those outages.

2.3. SEC MP293

18. SEC MP293[1] 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.

19. The modification originally considered two possible options:

    a. Enhanced availability

    b. Maintenance deferral

20. 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.

21. The enhanced availability solution is the preferred solution and has been progressed through the Modification. As part of the development of that modification Parties agreed that the enhanced availability solution would apply to DSP outage only, other causes of outage will not be supported by the enhanced availability solution.

2.4. The Request for a Maintenance Deferral Policy

22. 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.

23. 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.

24. We paused progress on this work while we awaited the outcome of SEC MP293. When it was understood that the solution to SEC MP293 will not be delivered until after the 2026-27 winter period we revisited the MDP to seek wider SEC Party feedback.

2.5. Consultation Areas

25. The aim of the MPD is to ensure that in scenarios where DCC Services are required as a matter 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. We proposed that the policy be temporary until the implementation on SEC MP293.

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. We published our consultation and the proposed policy in August[2].

[1] Deferment of DCC Planned Maintenance during Adverse Weather - Smart Energy Code
[2] Proposed Maintenance Deferral Policy | Smart DCC

3. Consultation feedback

27. We received five responses to the consultation, three from Network Parties, one from a large Supplier and one from the SEC Panel. We also completed additional engagement with SEC Operations Sub-Committee.

28. For clarity, where the comments provided in consultation responses did not directly relate to the question posed, those comments are included below in our summary of the responses provided for the question to which they align.

3.1. Temporary Nature of the MDP

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.

29. This question asked if Parties agreed the MPD should be temporary in nature, up to the implementation of the agreed solution for SEC MP293.

30. One Network party response did not answer this question, two other Network Parties agreed the Policy should be temporary, one of these noted that the SEC MP293 solution will remove the need for the MDP.

31. A Supplier Party also agreed the Policy should be temporary, limited up to the implementation of SEC MP293, and that any extension should only be implemented following consultation.

32. The SEC Panel agreed the policy should remain temporary to maintain focus on SEC MP293.

33. DCC consider that SEC MP293 was the route through which a range of parties have considered the implications of service outage resulting from Maintenance activity and BCDR Tests. The agreed solution for that modification will provide the enduring solution and welcome Parties agreement that the MDP should be temporary until that solution is delivered.

3.2. In Scope Maintenance Activity

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.

34. This question asked whether Parties agreed that the MDP should apply to high Impact Planned Maintenance only.

35. One Network Party and one Supplier Party agreed that the MDP should apply to High Impact Planned Maintenance only and both noted that minimal disruption caused by Low Impact Planned Maintenance. The SEC Panel also agreed the MDP should only apply to High Impact Planned Maintenance, noting that Unplanned Maintenance is deployed in emergency situations where delaying that deployment could create greater risk of service disruption.

36. Two Network Parties did not agree and considered that deferral applications should also be applicable to BCDR Testing, which they understood to be within the scope of SEC MP293.

37. DCC schedules service impacting BCDR Tests away from winter months as requested by Network Parties. We also note that there are two BCDR Tests proposed between the publication of this conclusion and the end of April 2027, by which time we anticipate the Enhanced Availability Solution that SEC MP293 implements to be available.

38. We also note that in the development of the solution for SEC MP293, the Modification working group and Modification Sub-Committee agreed that the final solution for the Enhanced Availability Solution would provide that service for DSP outages only.

39. As such, any outage caused Maintenance activity or BCDR Tests on any service other than CSP is not in scope of the Enhanced Availability Solution. For clarity, those BCDR Tests proposed for April 2027 are not DSP tests and the service impact caused by those tests will not be mitigated through the Enhanced Availability Service.

40. DCC consider that any temporary MDP should be closely aligned to the final solution of SEC MP293. We therefore do not consider it appropriate to expand the policy beyond High Impact Maintenance Windows in which most of the outage is associated to DSP.

3.3. Rights of Application

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.

41. 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. This question asked Parties for their views on the MDP not defining scenarios in which Maintenance deferral might be appropriate, but that the applicant should make their case for deferral.

42. All responses agreed that the Policy need not dictate scenarios in which an application for Maintenance deferral could be made.

43. The Supplier Party responder considered that the applicant should demonstrate the impact, probability, scale, dependency on DCC Services and the absence of reasonable alternatives in their application. They also considered that without minimum criteria the threshold for a request may be subjective.

44. A Network Party agreed that the Policy should not dictate scenarios appropriate for application but suggested additional examples could be provided. This respondent also noted that forecast information available at the point of application may change, that it may not be possible to provide a full business case and that they consider the application may only be a few paragraphs in length.

45. Two other Network parties considered that the applicant should not be required to provide highly detailed information since they may be prioritising other work and at the point of application and may not have full details available to them.

46. The SEC Panel agreed that the MDP should not define specific scenarios. They considered that the applicant should be required to set out the nature of the event, its potential impact and how continued DCC Service availability would provide mitigation to the events impact. They considered that this would provide sufficient flexibility to accommodate unforeseen scenarios.

47. DCC acknowledge that where a deferral request is made based on weather forecasts, that those forecasts may change. The wording in relation to the detail required in an application has been softened considering the feedback received. However, DCC continues to require sufficient detail

to enable a full assessment of the application for Maintenance deferral to be made. Since Maintenance deferral will result in additional disruption to all Parties and consumers, and will come at additional cost, sufficient detail on the need for Maintenance deferral must be provided. Where additional information would benefit decision making DCC would seek that information form the applicant or other SEC Parties to inform on the final decision.

3.4. Decision Making

Question Four

Do you consider it appropriate for DCC to acts 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.

48. Question four asked if Parties considered it appropriate for DCC, in the absence of any formal SEC Governance, to act as the decision maker for applications. Question five asked if Parties considered that the sources of information available to DCC would allow for a reasonable decision to be made.

49. All respondents agreed that DCC should act as the decision maker for the temporary policy.

50. One Network party considered that DCC is best placed to consider operational issues, programme and contractual implications in relation to a request for Maintenance deferral, and another Network Party supported the view that DCC is well placed to consider wider implications of Maintenance deferral. Both of these Parties considered that since DCC is best place to consider the wider implications of Maintenance deferral that this should result in less focus on the information provided by the applicant.

51. One Supplier Party considered that cross industry input should be obtained where possible, while a Network Party recommended that an independent industry body act as decision maker where time is available. They also considered that clear decision making and a route for escalation should be provided.

52. The SEC Panel agreed that DCC acting as the decision maker was a pragmatic approach given the potentially short timescales involved between the receipt of an application and decisions having to be made. They also suggested that the SEC Panel should be informed when an application is received by DCC.

53. One Network Party agreed that the sources of information would allow a reasonable decision to be made and noted the likely short timescales between confidence in weather forecasts and the application for Maintenance deferral.

54. Another Network Party supported the principal of gathering information from a wide range of SEC Parties but also considered that the information available to the applicant may be limited where they are preparing to manage an adverse weather event. They noted that weather forecast information may be the primary source of information which would allow them to provide the number and type of consumers impacted, including Priority Service Register consumers, based on the experience of previous comparable events. They noted that the impacts of weather events can change as storms progress and that this should be reflected in the application process. They

considered that an application for Maintenance deferral should allow for details of the weather warning and the potential operational implications.

55. One Network Party considered that obtaining input from a range of SEC Parties would help to ensure any decision would reflect the views of wider industry impacts, but they did not consider that would allow for a reasonable decision to be made.

56. The Supplier Party considered the sources of information to be a reasonable staring point and described specific information that they considered should be used for decision making. For the applicant they considered relevant information to including official weather warnings and forecasts, expected consumer impact and the geographical extent, safety implications, the services required and their expected operational benefit, the availability of contingency measures, and the probability and duration. The considered this should be considered alongside the impact of Maintenance deferral on other Parties, the impact on future maintenance and cost benefit analysis.

57. The SEC Panel agreed that the sources of information, including from multiple SEC Parties, would allow for DCC to make robust decisions. They noted that the Policy does not describe how DCC might request information from multiple SEC Parties.

58. While it would be DCC preference for an industry group to act as decision maker, we recognise this is impracticable given the likely short timescales between the receipt of an application and the decision needing to be made.

59. We agree that as much input into the decision, from a range of Parties, should be sought to help inform the decision-making process.

60. While DCC has access to wider implications related to DCC operational, programme and contractual implications of Maintenance deferral, we would seek input from Parties on the impact of Maintenance deferral on their individual organisations.

61. Furthermore, we consider that Maintenance deferral cannot be enacted simply because it is operationally and contractually feasible, but that the significant cost of Maintenance deferral, and the disruption it may cause to all Parties, must also be considered and justified. We therefore do not consider the access to information that DCC holds justification for reducing the information requirements of an application.

62. We agree that SEC Panel should be informed once an application has been received and have amended the policy to the effect.

63. DCC recognise that the information available to Parties making a request based on weather forecasts may change over time and differ from the actual impact experienced during an adverse weather event.

64. We welcome proposed data items from the Supplier Party, the majority of which we would expect to be included in an application for Maintenance deferral. Where additional information would help to inform the decision DCC will seek that from the applicant or other SEC Parties, and use internal information related to Maintenance plans and cost.

65. On challenging the decision, we note that their will likely be insufficient time available between decision making and enactment of that decision to allow for it to be revisited and we do not intent to formalise any escalation in the MDP. However, DCC remains open to challenge should a Party wish to discuss the decision and will take best efforts to be flexible, while noting that communication on the decision will likely have been issued to Parties through mass communications.

66. We have amended the MDP to describe how DCC might contact Parties to request additional information, but we note that much of this activity will need to be completed at speed to allow swift decisions to be made.

3.5. Rescheduling of Planned Maintenance

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.

67. Questions six and seven asked Parties for their views of rescheduling Maintenance to 48 hours after the original deployment date, and to exclude deferred Maintenance from any additional deferrals.

68. Three Network Parties and the Supplier Party considered that a 48-hour deferral of Maintenance not to be appropriate in all scenarios. They noted that adverse weather events may move across different geographical locations over time and still be present during the deferred Maintenance deployment.

69. The SEC Panel supported the proposed 48-hour deferral of Maintenance, noting that it provides for a clear and predictable mechanism for rearranging Maintenance deployment. They also noted that any rescheduled activity should be communicated to Parties as soon as possible. They considered that this would support effective planning and informed operational decision making and communication with consumers.

70. Three Network Parties and the Supplier Party did not consider that deferred Maintenance should be excluded from additional deferrals due to concerns that adverse weather events can last for longer than the deferral period. The Supplier Party considered that additional deferrals of already deferred Maintenance should be exceptional.

71. The SEC Panel agreed that deferred Maintenance should not be subject to additional deferrals, and they considered that this approach would provide clarity and certainty for Parties while supporting the effective management of wider change and Maintenance. They considered that should any evidence arise that a further deferral mechanism is required should be considered as part of a future review.

72. DCCs change activity ensures Service remain secure and robust, with each building on the last and often building up to the implementation of major change programmes. The change schedule is planned and must accommodate other activity such as BCDR Testing. Annual outage is planned and described in the Annual Outage Plan is agreed through the SEC Operations Sub-Committee in advance of each regulatory year. This allows Parties to implement their own strategies for managing DCC outage and plan their own change activities.

73. We consider that a standardised approach to deferral is required to allow Parties to understand the consequence of deferral and be able to react in a co-ordinated manner. Where the 48 hour deferral timeframe ensures the future schedule of change is not disturbed to ensure system updated and programmes are delivered on time. Changes to the annual outage plan would result in additional disruption to Parties and consumers. We also note that should the future schedule of change require replanning due to longer deferral timeframe that this would likely come at considerable additional cost.

74. As noted in the policy, the submission of a request does not guarantee the deferral of Planned Maintenance activity, and we consider that Parties should therefore plan accordingly.

3.6. Costs of Implementation

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.

75. Question eight asked if Parties supported DCC incurring the costs described when implementing Maintenance deferral.

76. Two Network Parties supported DCC incurring the costs described to defer Maintenance. Both considered that the provision of DCC services during periods of Network disruption aligned to Governments 2016 smart meter cost benefit analysis in relation to faster fault identification and resolution.

77. Another Network Party considered that further detail of costs is required and noted that the costs incurred should be outweighed by the benefits of retaining communication services.

78. One Supplier Party also considered additional detail on the cost drivers is required and sought detail on the expected number of deferral events during the duration of the policy. They considered that the decision to defer should be subject to financial consideration and reporting.

79. The SEC Panel, in recognition of the benefits that maintaining DCC Services may provide and the temporary nature of the policy, supported DCC incurring reasonable costs. They noted that the estimated cost of up to £711K per event highlighted the importance of ensuring deferral is only enacted where the benefits clearly justify the costs. They also note that a decision to defer Maintenance may also create additional disruption and cost for SEC Parties and consider that DCC should take this into account when making a deferral decision.

80. The costs to defer Maintenance cover the actions and work required to backout any preparation work where required, to replan activity and reimplement preparatory actions, and for the redeployment of essential staff at short notice. While costs will differ between events and the Service Providers involved in the Maintenance activity in question, we have provided the maximum cost to ensure full implications are understood. Deferral costs for individual requests will feed into decision making.

81. As part of informing on the decision to defer Maintenance DCC will seek the input from multiple SEC Parties, including on the disruption to their operations and costs involved. While no details to this end were provided in the consultation responses received, we welcome proactive comments from Parties prior to formal receipt of an application for Maintenance deferral.

3.7. Policy Implementation

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.

82. Question nine asked if Parties had any suggested changes or additions that should be considered for the MDP.

83. Two Network Parties had no additional comments.

84. One Network Party considered that the detail of an application for Maintenance deferral should include the likely volume of Priority Service Register (PSR) consumers.

85. One Supplier Party suggested that the MDP include more detail on defined eligibility and mandatory evidence, provide for a standard application form, and identification of the decision authority and escalation route. They also proposed financial approval tests and a requirement to consult other Parties, risk assessment before rescheduled Maintenance deployment, an exceptional repeat deferral route, and post event reporting.

86. The SEC Panel noted their response to other questions and highlighted their consideration for the need of a robust communication strategy. They consider that all Parties should be notified of a deferral request and requested clarity on communications related to decisions.

87. In DCCs draft MDP published alongside the consultation we detail information that we would expect to be included in an application and have included the number of PSR consumers that may be impacted by an event. The same draft also identified DCC Managing Director of Operations as the authority for decision making.

88. We have amended the policy to reflect communication requirements proposed, including the requirement for DCC to inform the SEC Panel and SEC Parties of the application for Maintenance Deferral. We have also added detail on how DCC will engagement with Parties to gather wider views, but we also note that decision timeframes may be limited and engagement attempts may not be successful. The Policy has also been updated in reference to the communication regarding Maintenance cancellation and the deployment of deferred Maintenance, in addition we have added a requirement for DCC to report on the deferral decision to SEC Panel.

89. We recognise other changes have been proposed but not incorporated in the final MDP. We do don't consider that the policy need define eligibility criteria but that the applicant Party should provide a robust rationale. Other changes, while reasonable for an enduring policy, have not been incorporated since we consider the current policy to be proportionate to its temporary nature.

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.

90. This question asked Parties if they considered that the MDP should be implemented.

91. Two Network Parties supported the objective of establishing and providing a mechanism through which Maintenance activity could be deferred. Both considered that the policy places too much emphasis on the detail required in an application, which they consider could create barriers to Parties making an application. Both preferred the informal process currently available to request Maintenance deferral.

92. Another Network Party stated that the MDP should not be implemented due to the 48-hour deferral timeframe, which they considered could result in a chain of deferrals.

93. The Supplier Party supported the principal of the MDP but did not consider that it would allow for genuinely critical requests for maintenance deferral. They proposed that defined eligibility thresholds should be established for decision making.

94. The SEC Panel supported implementation of the MDP as a pragmatic temporary mechanism through which exceptional circumstances can be managed before the delivery of the MP293 solution. They noted that this support is provided so long as the Policy is operated in a transparent and

proportionate manner, including visibility of applications and decisions and the consideration of implications across all SEC Party types.

95. When developing early version of a deferral policy, originally focused on adverse weather, it was difficult to define scenarios where Maintenance deferral might be appropriate. In recognition that the same adverse weather scenario might impact different regions differently, and that adverse weather might not be the only cause for requesting Maintenance deferral, we redrafted the policy with the focus moved to the impact and benefits on the requesting Party. Since the impact on Parties and the benefits of deferral are known best by the applicant, we consider that the applicant Party needs to describe those items for each individual event.

96. We consider that Maintenance deferral must be justified and that the applicant Party is best place to make their case and provide justification to implement Maintenance deferral, which must then be balanced against the cost incurred and the impact on all SEC Parties and consumers.

97. We consider that the proposed policy replicates the process and decision making currently available to Network Parties. We have made changes to the policy to detail requirements related to communication and ensuring transparency in the process to all Parties.

Question Eleven

Do you have any other comments?

98. Question eleven invited any further comments.

99. A Network Party requested that the solution to SEC MP293 be deployed as soon as possible and noted the volume of historic Maintenance deployments that have coincided with a storm event but did not describe the impact of those events.

100. A Supplier Party proposed that DCC provide a report once the policy expires to detail the number of applications and deferral events, and the cost incurred from implementing deferral requests.

101. Another Network commented that they considered any authorised person from the applicant SEC Party should be able to make an application.

102. DCC is working to deploy the solution to SEC MP293 and is engaged with the Modification process to ensure that solution is delivered as required.

103. Reporting on applications made following the expiry of the policy can be provided by DCC.

3.8. SEC Operations Sub-Committee Engagement

104. Following consultation closure we presented the MDP and responses to the SEC Operations Sub-Committee. Network Parties reiterated their considerations that the detail required in an application for Maintenance deferral was too great and the 48-hour deferral timeline was too restrictive.

105. While we recognise these concerns, we consider that the impact on all Parties and consumers of late amendments to Maintenance deployment, and the cost incurred as a result of deferral, must be sufficiently justified. Since the applicant Party would consider deferral of Maintenance to be required they are best placed to describe the impact of maintaining the schedule and the benefits of deferral. These considerations cannot be provided by any other Party other than the applicant. Given DCCs position and knowledge of any impacts in relation to future Maintenance releases, programme milestones and contractual obligations, we can combine this view with the detail provided by the applicant and input gathered from other Parties, in the decision-making process.

106. Additional engagement with a Network Party they confirmed that they supported a Maintenance deferral policy, but they would not support the policy in its current form. They considered that the requirements on the detail required in an application to be too stringent and that Networks may not be able to provide the required detail while they prepare for an adverse weather event. In addition, they consider the 48-hour deferral to not be sufficient for all potential scenarios where adverse weather events could last for longer time periods where the availability of DCC Services for the entire event to be beneficial.

107. While the Network Party recognised the constraints described by DCC in terms of justification of incurred cost, disruption to Parties, and the protection of the future schedule of change, they continue to be unsupportive of the policy in its current form.

108. In November 2026 SEC Operations Sub-Committee provided their endorsement for implementation of the MDP via ex-committee.

4. Conclusion

109. The Maintenance Deferral Policy has been designed in recognition of Network party concerns and their consideration that there should be a method by which to defer Maintenance activity during adverse weather events. Where deferral would allow for DCC Services to remain available and free from disruption.

110. We recognise that the deferral of Maintenance may support the operations of some Parties, or a single Party, during a specific event, and cause additional disruption to others. We also recognise that the MDP does not provide the flexibility desired by Networks in terms of application rationale and deferral timelines.

111. In addition, we recognise concerns related to the assessment of a deferral where this Policy does not describe scenarios where deferral might be appropriate but rather requires the applicant Party to provide their rational for each event. We consider that this approach provides for variability across events and Parties in relation to when Maintenance deferral might be appropriate.

112. We have amended the policy to further describe communication and engagement with Parties that DCC will complete as part of the application and decision-making process. We would encourage Parties, and particularly Supplier Parties who we consider are less likely to apply for Maintenance deferral but will be impacted by such deferrals, to proactively provide their consideration of the implications of late changes to Maintenance deployment.

113. We consider that the policy provides Parties with the ability to request deferral, allows for sufficient information to be provided to DCC to allow a deferral decision to be made, while also protecting the future schedule of change to protect future Maintenance deployment and programmes while also limiting further cost. We consider this MDP to be the maximum DCC can reasonably deliver.

114. Noting consultation responses supporting the policy principals, the SEC Panels consideration and SEC Operations Sub-Committee endorsement of the MDP, DCC confirm that the finalised version 1 of the policy, published alongside this document, has been implemented. The policy expires from the deployment of the SEC MP293 solution.