RETAIL ENERGY CODE

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DEEP DIVE ON THE DELAY TO SUPPLIER ARRANGED APPOINTMENT UPDATE NOTIFICATIONS ISSUE

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FOR INFORMATION	We have previously shared with the PAB information on two previous incidents that required DNOs to replay specific messages. In this paper, the Code Manager describes a third issue that has a similar effect, requiring DNOs to replay messages. The Code Manager has confirmed that these incidents have different causes, understanding the root causes and confirming that action has been taken and is continuing to prevent recurrence. We have also assessed the impact on the market, and outlined the actions taken by the CRS Provider.
APPENDICES	Appendix A – Summary of messages requiring submission by DNO.

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1 BACKGROUND

On 29th July the CRS Provider informed the Code Manager of a P3 incident (INC0368609) which resulted in the failure of Supplier Arranged Appointment Notifications (CSS07000) to DNOs. The issue was resolved on 30th July 2026; however, further action is required to ensure that all failed notifications resulting from the incident are successfully resubmitted.

Similar incidents were previously raised by the CRS Provider on 7 April 2026 and 3 June 2026 that were subsequently reported to PAB. While the root cause of the three incident differs, the outcome remains comparable, with failed notifications requiring resubmission.

This deep dive includes discussion with the CRS Provider on the confirmed cause of the failure, the resulting impact, lessons learned, and the actions taken to mitigate the risk of recurrence.

2 UNDERSTANDING THE CAUSE OF FAILURE

The Smart Meter Data Services Provider (DSP) is a critical technology component governed under the SEC. It facilitates communication between Parties and smart meters in consumer's premises.

Investigations identified that this issue occurred due to a certificate mismatch between DSP and CSS. DSP Signing Certificates were renewed on 9th July ahead of upcoming expiry, this did not cause an immediate impact with the previous certificates still in place.

On the evening of 28th July DSP was brought down as planned during the SMETS High Impact Window, when DSP was brought back up at 23:51 28th July 2026, after maintenance completion, the new certificates were in place. Subsequently any asynchronous messages sent from DSP to CSS failed due to certificate verification.

It is the expectation that parties connecting into DSP automatically update the 'public key' via the DSP SMKI (Smart Metering Key Infrastructure) repository, however manual intervention was required by Landmark to complete this activity at 12:53 30th July 2026.

To note, synchronous messages were not impacted therefore there was no impact to switches completing.

2.1 CAUSE OF PREVIOUS INCIDENTS

April - INC0357601 - A Microsoft-initiated platform security update on CSS TLS cipher suites and DSP using a deprecated cipher suite that was no longer supported under the updated configuration resulting in DSP > CSS connection failures.

June - INC0364411 - DSP outbound connectivity to CSS failed following planned work to renew certificates within the DSP infrastructure on 03/06 at 13:00. A missed implementation step within the CSS technical solution led to a configuration mismatch. This was identified through automated DCC incidents.

2.2 IMPACT ON MARKET PARTICIPANTS

The incident impacted the delivery of Supplier Arranged Appointment Update Notifications (CSS07000) to DNOs. These notifications are used by CSS to confirm the outcome of Supplier Arranged Appointment (SAA) updates for the Meter Data Retriever role where the registration is in an active state.

Approximately 212,000 messages sent from DSP to CSS failed as a result of the incident and require resubmission.

The impact is primarily limited to the absence of confirmation responses from DSP to CSS, rather than the underlying updates themselves. As a result, the MDR has been updated within the DSP system, but confirmation back to DNOs systems is missing.

If a CSS07000 is not issued, the corresponding IF035 is not triggered in MPRS. In some cases, third party MDRs may not be able to begin their MHHS activities. However, half-hourly and BAU reads will continue to be available to Suppliers, including those operating under their MDR role. Although MPRS will

not be updated until the relevant data is resubmitted—resulting in a temporary data misalignment—**this does not prevent reads from being obtained for billing or settlement purposes.**

It is acknowledged that the requirement for DNOs to resubmit messages poses challenges for their resources and BAU processes.

2.3 DOWNSTREAM IMPACT

Previously, the request by DCC to resend messages using the CSS refresh functionality caused a backlog of CSS messages leading to delays, resulting in timing issues such as initial registration requests being received prior to MPAN set up in CSS and Secured Active Messages being delayed until after gate closure resulting in lapsed appointments and generating exceptions.

Advice was issued for DNOs to only perform CSS refreshes using the REG ID (to send only the C0200), and not the MPAN, to avoid generating the full suite of CSS Messages. Advice was also issued to Suppliers re-trigger appointment/reappoint requests.

The advice to DNOs has been reiterated through incident comms and no further issues regarding backlogs are anticipated.

At the time of reporting, there is no indication of further significant downstream market impact following the latest incident.

2.4 RESOLUTION AND MITIGATING ACTIONS

DCC have implemented the relevant technical fixes for this, and previous incidents. However, this incident required DNOs to manually replay messages. At the time of this paper the case majority of messages have been resubmitted, with DCC tracking the progress of individual organisations.

DCC have identified learnings to enable them to better respond to similar incidents. A number of actions have been completed or remain in progress. Below are the high-level actions that we are taking to better prevent, identify and mitigate future incidents;

Item	Category	Action
1	Preventative	Forward looking review of the certificate replacement requirements, with improved tracking and proactive monitoring of upcoming cert expiries, including the certs that have caused these incidents.
2	Preventative	Assess possibility of automated cert replacement where possible.
3	Preventative	Lower environment testing of cert replacements and negative testing to cert validation
4	Identification	Improved alerting from DSP for early identification of failed message delivery
5	Identification	Landmark to implement monitoring by isolating the DSP interface. This will capture all failure type scenarios seen from the 3 incidents allowing for expedited investigations.
6	Identification	Review adding automatic health checks to verify DSP messages are being accepted correctly.
7	Mitigation	Review DSP retry strategy/design - Can 12-hour retry period be extended. - Can failures be stored for a period to allow resubmission after a transient issue has been resolved.

Be executing all of the above we aim to;

1- Prevent future occurrence happening

2- Identify any issues more quickly should they occur

3- Minimise the impact

3 RECOMMENDATION

PAB should **NOTE** this incident.

Incidents have been raised for each impacted DNO where applicable, with further details.

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APPENDIX A – SUMMARY OF MESSAGES REQUIRING RESUBMISSION BY DNO (16/09/26)

INC0368609 from 29th to 30th July :

Only 1 outstanding resubmission, this has been raised again to the DNO in question

DNO	MPID	NOT RESUBMITTED	Total
National Grid Electricity Distribution (NGED)	SWAE		6383
	SWEB		10537
	MIDE		14469
	EMEB		15693
Northern Powergrid (NPG)	YELG		25087
	NEEB		18759
Scottish Power Energy Networks (SPEN)	MANW		7761
	SPOW		12075
SSE	SOUT		19611
	HYDE		3892
UK PN	LOND		14781
	SEEB		17366
	EELC		17651
ENWL	NORW		16880
BU-UK	IPNL		240
	ETCL		6515
ESP Electricity.	LENG	1	1785
Last Mile	GUCL		2194
Energy Assets	UDNL		124
Harlaxton	HARL		12
MUA	MPDL		35
UKPD	UKPD		326
Leep Utilities	PENL		29
Fulcrum	FEAL		12
Advanced Elec Network	AENL		5
Stark	STRK		3
UAL	UTAL		1
Optimal (OPN)	FORB		16
Vattenfall	VATT		2
Total		1	212244

INC0364411 from 3rd to 4th June :

From the initial 93k, there are 33 outstanding resubmissions, this has been raised again to the DNO in question

DNO	MPID	NOT RESUBMITTED	Total
Leep Utilities	**PENL**	**33**	**35**