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DP258

‘Aligning requirements for System Outage notifications’

Modification Report

Version 0.1

11 December 2023

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 David Rollason from the Data Communication Company (DCC)

The Smart Energy Code (SEC) has different notification periods for system outage notifications (Business Continuity and Disaster Recovery (BCDR) testing and Planned Maintenance). From a Service User perspective, it would be better to have all system outages amalgamated into one notification and consultation. This is because their interest is in the system outage rather than the reason. From the DCC perspective holding separate consultations for BCDR and Planned Maintenance is less efficient than producing the one notification period.

2. Issue

What are the current arrangements?

The DCC have two separate obligations, one being BCDR and the other being Planned Maintenance. Both obligations require a notification period. These notification periods exist to provide Suppliers a period to plan and issue communications to consumers in a timely manner. The issue comes down to having two different notification periods for BCDR and Planned Maintenance. It has caused confusion for Suppliers to follow two different sets of notification periods. In addition, the DCC also provide an annual outage plan which is outside of their obligations.

BCDR Testing

BCDR is a set of processes, plans and policies that help organisations recover from a disaster and ensure the effective continuation of business operations. Plans should be tested on an annual basis to ensure that they will work as planned in the event of them being required. SEC Section H 'DCC Services' H10.9 requires the DCC to have a BCDR procedure in place to ensure that in the event of a disaster there is no significant disruption to services and that services can be restored as soon as possible. SEC Section H 'DCC Services' H10.11 places an obligation on the DCC to periodically test the BCDR arrangements to assess whether they remain suitable for achieving the objectives set out in SEC H10.9. [SECMP0029 'Business Continuity and Disaster Recovery Testing Amendments'](#) introduced an obligation on the DCC to consult with Parties and provide a sixty-day notice period for any BCDR testing. SEC Section H10.12b states "*The DCC shall notify each Party of its intention to carry out a Business Continuity and Disaster Recovery Test and provide each Party with a Business Continuity and Disaster Recovery Test Schedule at least 60 Working Days before the date on which such test is due to start*". The rationale for deciding a sixty-day notice period was due to giving Suppliers' time to plan accordingly and issue communications to consumers in a timely manner. This was to ensure that the test would minimise any disruption to the provision of the services provided to consumers.

Planned Maintenance

The SEC defines Planned Maintenance in SEC Section A as the maintenance of DCC systems planned prior to the start of a month which will disrupt or pose a Material Risk of disruption to the provision of the certain services. Planned Maintenance is split into high and low categories;

- High Impact Planned Maintenance is where one or more of the following is disrupted:
 1. End-to-end communications between Users and Communication Hubs in either direction
 2. Install and commission activities; or
 3. Previously scheduled Smart Metering Equipment Technical Specifications (SMETS)1 migrations
- Low Impact Planned Maintenance will disrupt or pose a Material Risk of disruption to the provision of services, excluding the services set out in High Impact Planned Maintenance, and will not require changes to be made by Users except in cases where the Service Improvements are being made to the Self-Service Interface (SSI).

The DCC continue to publish the schedule of Planned Maintenance (as per Section H8.4) and issue an email notification to all Parties 20 Working Days ahead of the month in which Planned Maintenance will occur. The notification sets out when the scheduled windows are for High Impact and Low Impact changes and provides high level information on what Parties should expect in each window.

Annual Outage Plan

In addition to the above consultation, for the last two years the DCC has also produced an annual outage plan upon request from the Operations Group (OPSG), although there are no obligations for the DCC to provide this. The annual outage plan is a schedule of all outages which are anticipated by the DCC. This plan allows the DCC to have feedback on any planned activity. It also gives a much clearer picture on when a Party should anticipate an outage and can streamline their processes internally for minimum disruptions. However, changes to the plan are inevitable when planning so far in the future. Often events can be rescheduled, and the value of the initial plan is diminished. Views will be sought from the OPSG on the appetite for the annual plan.

What is the issue?

The engagement and notification for BCDR which is sixty-days' notice, is not aligned with Planned Maintenance engagement which is twenty days' notice. The DCC believes that DCC Users are interested in the holistic view of when the system will be impacted, rather than having these separated out. It also causes the DCC increased administration to have two separate engagement strategies for system downtime.

What is the impact this is having?

DCC Users are interested in the full outage BCDR Test Schedule as well as the Planned Maintenance time periods. This misalignment makes it difficult to engage effectively in a joined

manner. The DCC believes that aligning these requirements will make it easier for Users to plan for DCC System downtime, as well as simplifying the communication process.

Impact on consumers

This modification does not impact consumers.

3. Assessment of the proposal

Areas for assessment

Would aligning both BCDR and Planned Maintenance periods provide clearer communication?

The differing notice periods may cause confusion. This raises concerns about the clarity and effectiveness of communication. Having both BCDR and Planned Maintenance notice periods amalgamated could aid in clearer communication.

Would it be a valuable to incorporate the annual outage plan within this modification?

As this modification revolves around aligning notice periods for BCDR Testing and Planned Maintenance, a consideration should be given on whether incorporating the annual outage plan which is already being produced consecutively for the last two regulatory years should be made a requirement in the SEC. The value of this requirement should be considered against the level of effort for something which also holds no certainty to stay the same.

Sub-Committee input

Smart Energy Code Administrator and Secretariat (SECAS) will engage the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums. SECAS believes the following Sub-Committees will need to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	Input on if and how to align BCDR testing with Planned Maintenance
SMKI PMA	No input required
SSC	No input required
TABASC	No input required

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	11 Dec 2023
Presented to CSC for initial comment	19 Dec 2023

Italics denote planned events that could be subject to change

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
BCDR	Business Continuity and Disaster Recovery
CSC	Change Sub-Committee
DCC	Data Communication Company
OPSG	Operations Group
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SMETS	Smart Metering Equipment Technical Specifications
SSC	Security Sub-Committee
SSI	Self-Serve Interface
TABASC	Technical Architecture and Business Architecture Sub-Committee