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DP258

‘Aligning requirements for System Outage notifications’

Modification Report

Version 0.3

20 June 2024

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. 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 60 Working 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 60 Working Day notice period was to give Suppliers' time to plan accordingly and issue communications to consumers such as a consumers who has a Pre-Payment Meter (PPM) installed which is effected by the BCDR test schedule in a timely manner. This was to ensure that the test would minimise any disruption to the provision of the services provided to consumers. The Proposer of SECMP0029 suggested the 60 Working Days notification to the Working Group, who agreed it to be suitable.

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.

What is the issue?

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. The engagement and notification for BCDR which is 60 days' notice, is not aligned with Planned Maintenance engagement which is 20 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. The DCC believes that this misalignment makes it difficult for them to engage effectively in a joined-up manner. It 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 directly but will impact the ability of Suppliers to issue timely communications to PPM consumers about outage periods. All DCC Users could be impacted as the Solution proposes to merge both the BCDR notification period and the Planned Maintenance notification period.

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.

BCDR Testing and Planned Maintenance both result in downtime of DCC Systems. DCC Customers have requested a combined view of downtime since it is the downtime that impacts them and not the reason for the downtime. This is handled through communication via the OPSG. However, both causes of downtime have different engagement and notification requirements, and this difference results in engagement that is specific to BCDR Testing without the view of annual outages. The proposed change is to amend (reduce) the engagement requirements for BCDR Testing to that of Planned Maintenance, this would streamline the process, create efficiencies for the DCC and result in simplified and easier to engage with communications for SEC Parties.

Withdrawal of modification

This modification was placed on hold on 29 February 2024. This was due to the DCC needing to provide an approach document which would detail the importance of BCDR Testing and why it is required. The approach document requires an internal DCC review as well as OPSG input prior to being circulated. The Proposer has decided to withdraw this modification and continue reviewing the BCDR Testing approach.

Observations on the issue

Views from the CSC

This modification was presented to the Change Sub Committee (CSC) in December 2023 for initial comment. A member questioned if this modification should be raised, noting the low priority scores. This was acknowledged by SECAS. SECAS have presented the issue to the Operations Group (OPSG) with the intention of seeking confirmation that this modification holds value to be progressed to the Refinement Stage. The Proposer advised that the intention is to align the BCDR engagement notification with the Planned Maintenance notification. They stated having two different requirements on engagement can lead to confusion and aligning the two notifications will prevent this.

Views from the OPSG

OPSG members did not object to aligning both notification periods. However, a member did note decreasing the BCDR notification period to 20 Working Days is insufficient and suggested exploring an alternative duration to combine Planned Maintenance and BCDR notifications. The Proposer is

keen to align to 20 Working Days which has been sufficient for Planned Maintenance since being introduced.

Sub-Committee input

The Smart Energy Code Administrator and Secretariat (SECAS) will engage the Chairs from OPSG, the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC), the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) and the Testing Advisory Group (TAG) 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
TAG	Review impact on existing Maintenance activity

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	11 Dec 2023
Presented to CSC for initial comment	19 Dec 2023
Modification discussed with OPSG	29 Jan 2024
Modification placed on hold	29 Feb 2024
Request for withdrawal of modification	4 Jun 2024
Modification referral window	5 Jun – 19 Jun 2024
Modification withdrawn	19 Jun 2024

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
SMETS	Smart Metering Equipment Technical Specifications
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
SSI	Self-Serve Interface
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Advisory Group