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MP289 ‘BCDR Engagement’

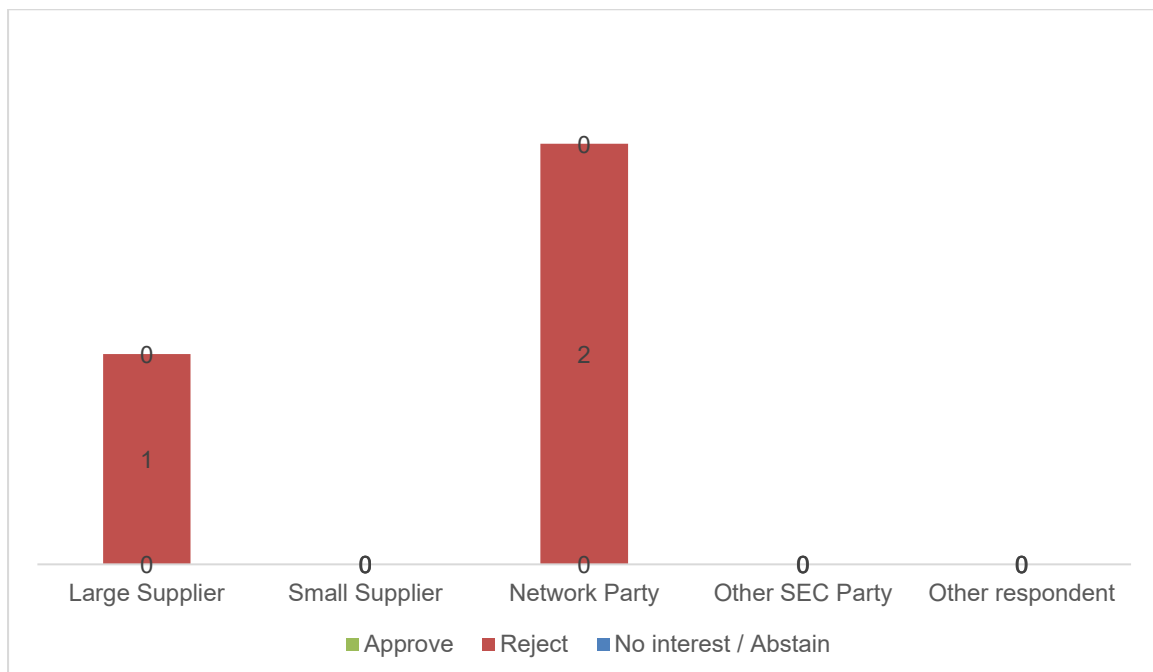
Annex C

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP289 Refinement Consultation.

Summary of responses



Refinement Consultation

SECAS received three responses to the Modification Report Consultation. All believed that the modification should be rejected and did not consider the modification better facilitates the SEC Objectives. One respondent made direct reference to Objectives (f)¹, (g)² alongside their view that the modification should be rejected.

¹ ensure the protection of Data and the security of Data and Systems in the operation of this Code.

² facilitate the efficient and transparent administration and implementation of this Code.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
SP Electricity North West	Network Party	No	Whilst we agree with the solution in principle for improving efficiency by reducing unnecessary engagement for non-impactful tests, we have concerns with the current proposed solution and legal text and as such are requesting: 1. Further development of the contents of the new BCDR testing approach document regarding a. Inclusion of a Change Log section for visibility. b. Definition of a “material change.” We request that the definition of a Material changes includes a change which is sent for information to OPSG/TABASC and published on the SECAS website and mentioned in SEC newsletters to ensure transparency. c. Further clarity on the DCC requirement whereby they are “only required to notify Parties ahead of BCDR testing that is expected to impact the provision of DCC Services”. This introduces uncertainty about when notification is required. We request:	SECAS has engaged with the Proposer who has provided the following in response to the feedback received: • Regarding point 1a, the BCDR Testing Approach Document currently contains a change log table on page 2. • Regarding the point 1b, the use of “material change” in the approach document is in reference to systems and traffic, not the approach itself. • Regarding point 1c, where a BCDR test is expected to impact service provision, the same engagement and notification would be required as is today (this includes the industry consultation and the application of the 60 working day notice period).

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			• clear criteria for determining when a test is considered “impactful.” • Realistic notification timeframes for all impactful tests (e.g., minimum 60 Working Days where possible). • A contingency process allowing Parties to request withdrawal or rescheduling of a test if the impact is too high or the notice period is too short. • Explicit communication of fallback options for unexpected changes close to the test date. • Once a BCDR test is classified as non-impactful, no changes should be introduced that make it impactful. If any change introduces impact, the notification process must restart from the beginning (including the full 60 Working Days’ notice). Our areas for improvements will provide confidence in what actions are required and ensure operational readiness for all Parties. This would avoid ambiguity and mis interpretation and ensure confidence in planning.	The Proposer therefore does not consider that a test should be delayed where this notification has been provided. The DCC is not recommending any changes to the notification on Service impacting tests from those currently in place. Over recent years, the DCC has been deploying BCDR Testing and categorised those tests as Service impacting or non-service impacting. The Proposer is not aware of a time where those categorisations have proven to be inaccurate or where Parties have been unexpectedly impacted. The Proposer has advised that they could define “service impacting” within the approach document if parties feel this is needed. Notification of Service impacting tests will need to be provided 60 working days in advance, as is currently the case. In reality, the DCC will endeavour to issue a single consultation and notification covering

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
				April to March tests, and therefore most tests have significantly greater notification periods. Withdrawing a test will not result in changes to its impact when rescheduled and therefore cannot be accepted as a reason for delay. Before testing commences, we have internal controls for ensuing (go – no go review point, e.g. including a weather review). This Modification will not amend the engagement and notification where Service impacts are expected, allowing Parties to plan accordingly. This is true where a planned test not impacting service is amended such that it would impact Service.
National Grid Electricity Distribution	Network Party	No	Whilst we support the principle of improving efficiency by reducing engagement for non-impactful BCDR tests, the current proposal introduces ambiguity through the phrase: “only required to notify Parties ahead of BCDR testing that is expected to impact the provision of DCC Services.”	The Proposer has referenced their responses against Q1 and Q10 in direct response to the views put forward by this respondent.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			This leaves the determination of “impact” to the DCC, creating uncertainty and potential operational risk for Parties. The following clarifications and improvements would be required for our organisation to support the proposal: • Clear, objective criteria for defining an impactful BCDR test. • Minimum notification periods for impactful tests (ideally 60 Working Days). • Contingency processes for rescheduling or withdrawal if impact is too high or notice is insufficient. • Explicit fallback arrangements for unexpected changes. Assurance that any non-impactful test that becomes impactful restarts the full notification cycle.	
British Gas	Large Supplier	None	No response provided.	N/A

Question 2: Do you agree that the legal text will deliver MP289?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
SP Electricity North West	Network Party	No	For the rational described in our response to Q1.	Please see the relevant SECAS Response to Q1.
National Grid Electricity Distribution	Network Party	No	The current legal text does not adequately address the ambiguity around what constitutes an impactful test or how changes to the BCDR Testing Approach document are managed. The following clarifications and improvements would be required for our organisation to support the proposal: • Include objective impact criteria and defined notification processes. • Introduce a version-controlled Change Log in the BCDR Testing Approach document for transparency.	The Proposer has referenced their responses against Q1 and Q10 in direct response to the views put forward by this respondent and is not seeking to amend the legal text at this time.
British Gas	Large Supplier	None	No response provided.	N/A

Question 3: Do you agree with the proposed implementation approach?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
SP Electricity North West	Network Party	Yes	The timeline is reasonable, but success depends on robust version control and clear communication of updates to mitigate governance concerns.	The Proposer has referenced their responses against Q1 and Q10 in direct response to the views put forward by this respondent.
National Grid Electricity Distribution	Network Party	Yes	Whilst the timeline is reasonable, success depends on robust version control, clear publication, and timely communication of updates. The following clarifications and improvements would be required for our organisation to support the proposal: • Version-controlled publication of the BCDR Testing Approach document. • Mechanism to communicate updates effectively to all SEC Parties.	The Proposer has indicated that there is a the BCDR Testing Approach Document currently contains a change log table on page 2. The Proposer has referenced their responses against Q1 and Q10 in direct response to the views put forward by this respondent.
British Gas	Large Supplier	None	No response provided.	N/A

Question 4: Will there be any impact on your organisation to implement MP289?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
SP Electricity North West	Network Party	Minimal (direct impact)	Some internal governance and operational team review may be required but no technical changes expected.	SECAS will note this impact within the Modification Report.
National Grid Electricity Distribution	Network Party	Minimal	Minimal direct impact. Internal review of governance and operational processes may be required to align with updated notification procedures.	SECAS will note this impact within the Modification Report.
British Gas	Large Supplier	None	No response provided.	N/A

Question 5: Will your organisation incur any costs in implementing MP289?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
SP Electricity North West	Network Party	None	(internal review only). Costs relate to governance review and stakeholder engagement updates. No system changes required.	SECAS will note this within the Modification Report.
National Grid Electricity Distribution	Network Party	None	No material costs. Any minor costs would relate to internal governance review, no system changes are required.	SECAS will note this within the Modification Report.
British Gas	Large Supplier	None	No response provided.	N/A

Question 6: How long from the point of approval would your organisation need to implement MP289?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
SP Electricity North West	Network Party	2–4 weeks post-approval	Activities include reviewing the updated approach document, updating internal governance processes if required, and communicating changes internally.	SECAS will note the requested lead time within the Modification Report.
National Grid Electricity Distribution	Network Party	Minimal	Short lead time. Internal review and updates could be completed within existing operational planning cycles.	SECAS will note the requested lead time within the Modification Report.
British Gas	Large Supplier	None	No response provided.	N/A

Question 7: Do you believe that MP289 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	SEC Objective(s)	Rationale
SP Electricity North West	Network Party	No	Objective (f) Objective (g)	Refer to our response to Q1.
National Grid Electricity Distribution	Network Party	No, not in its current form	No response provided	While the principle could support efficient governance and resilience of DCC services, the lack of clarity and safeguards means the proposal does not fully facilitate the General SEC Objectives.
British Gas	Large Supplier	None	No response provided	No rationale provided

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP289 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
SP Electricity North West	Network Party	Yes, indirectly	Consumers benefit from reduced risk of prolonged outages and clearer supplier communications during BCDR events. Transparency in planning supports better coordination.	SECAS will note the impacts/benefits within the Modification Report.
National Grid Electricity Distribution	Network Party	Yes	Consumers could benefit from MP289 where it is implemented with the clarifications suggested, because: • Reduced risk of prolonged service outages due to better planning and coordination of BCDR tests. • Clearer communications from Suppliers during BCDR events, supported by DCC transparency. • Improved visibility and transparency of testing enables Parties to coordinate more effectively, reducing potential disruptions to consumers.	SECAS will note the impacts/benefits within the Modification Report.
British Gas	Large Supplier	None	No response provided.	N/A

Question 9: Noting the costs and benefits of this modification, do you believe MP289 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
SP Electricity North West	Network Party	No	Refer to our response to Q1. We would support an improved solution that addressed our concerns.	The Proposer has referenced their responses against Q1 in direct response to the views put forward by this respondent.
National Grid Electricity Distribution	Network Party	No	While MP289 has potential benefits—such as reducing unnecessary engagement for non-impactful BCDR testing, improving efficiency, and providing greater transparency through the BCDR Testing Approach document—we cannot support the modification as currently drafted. The proposal introduces ambiguity regarding what constitutes an “impactful” test and lacks clear processes for notification, contingency, and change management. Our support for MP289 would be conditional on the following clarifications and improvements being implemented: • Objective criteria for determining impactful BCDR tests. • Defined minimum notification periods for impactful tests (ideally 60 Working Days).	The Proposer has referenced their responses against Q1 and Q10 in direct response to the views put forward by this respondent.

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
			- Contingency processes allowing rescheduling or withdrawal if impact is too high or notice is insufficient. - Explicit fallback arrangements for unexpected changes. - Version-controlled Change Log for the BCDR Testing Approach document. - Assurance that any non-impactful test that becomes impactful triggers the full notification cycle.	
British Gas	Large Supplier	No	No rationale provided.	N/A

Question 10: Please provide any further comments you may have.

Question 10			
Respondent	Category	Comments	SECAS Response
SP Electricity North West	Network Party	No response provided.	N/A
National Grid Electricity Distribution	Network Party	No response provided.	N/A
British Gas	Large Supplier	From an operational point of view, in principle, the ability for the DCC to be able to schedule and conduct BCDR test that don't impact us more flexibly (not hampered by the 60 day notice period) would be useful, and it will give the DCC more opportunity to ensure tests are carried out. It seems that most BCDR deemed as "non-impacting" will be paper based exercises or part of other maintenance. However, we are cautious about ensuring the correct level of due diligence is conducted to confirm impact assessment is "non-impacting", otherwise it might be exploited to sneak BCDR in at short notice, through bad planning and as a result, and it may generate unexpected impacts to us as a business if the test then goes awry. We therefore have replied "No" to Question 9, unless we felt more reassured by the impact assessment approach. If it did go ahead, the additional clause under C, seems good and firmer obligation to update quarterly as a minimum. We are concerned that this mod enables DCC to be less transparent about changes / testing and it isn't always correct about what impacts	SECAS has reached out to the Proposer who has provided the following response to the respondent's comments: - Over recent years DCC has been deploying BCDR Testing and categorised those tests as Service impacting or non-Service impacting, we are not aware of this categorisation causing any issues for Parties and this has not been raised as a concern in any of our consultations. - DCC's rationale for testing is detailed in the approach document and provided to Parties at regular intervals in line with the testing schedule consultation every year via

Question 10			
Respondent	Category	Comments	SECAS Response
		its system has on us (especially on advice from its Service Providers). We currently use all the information DCC shares to plan our own system tests and changes throughout the year, this could impact our plans at short notice. It is also unclear what happens if a BCDR event overruns during planned maintenance, if we haven't been told about it? Planned maintenance is 6 hours, BCDR is 8 hours - 4 hours failover, 4 hours to failback. It would be a minor disruption but if that coincided with Monday morning prepayment vends etc that could be impactful on our call centre or engineers. The modification refers to two types of non-impacting tests: desktop (non-system) tests and associated tests. In general, not being notified for desktop exercises should be fine, but our concern is for the associated testing. Practically this would mean the DCC could do a system test at the same time as another change without informing any stakeholders. In practice, we do need to know if this is taking place, so we are aware if anything odd happens. This shouldn't impact service, but could save a lot of time during the investigation phase if we (as a Supplier) were made aware the testing was taking place.	the DCC consultation website. Desk based tests do not risk service availability. Some live tests are combined with other service impacting availability and are not considered to impact service availability to a greater extent. Finally, some live tests are stand alone and do impact Service availability. DCC follow the current SEC requirements to consult and notify BCDR Test activity and do not deploy tests on an ad hoc basis. This Modification is aimed at allowing more flexibility and efficiency where tests do not impact service availability, and where non-service-impacting tests do not require customers to plan or adjust their activities, even when scheduled with limited notice. DCC are not aware of any impacts to its customers when we have advised of a test with no service impact. Should a non-Service impacting test be completed that results in a Service Impact DCC

Question 10			
Respondent	Category	Comments	SECAS Response
			would be in breach of the SEC (which would require engagement and notification) and would need to declare an Incident. • The Modification proposes that DCC are required to publish a BCDR Test approach document, while the DCC are open to comments for additions or for clarity, the aim of the document is to provide transparent information on the approach, and not to agree that approach. DCC do not consider that a quarterly update requirement is appropriate. • This Modification will not amend the engagement and notification where service impacts are expected, allowing Parties to plan accordingly. This is true where a planned test not impacting service is amended such that it would impact Service – in this scenario consultation and notification would be required. • Under the proposal DCC could not schedule a BCDR Test event during

Question 10			
Respondent	Category	Comments	SECAS Response
			a Maintenance window where the BCDR test is expected to require more time than the Maintenance, unless that test was advised as Service impacting. Should BCDR Tests run for longer than the advised period, either where those tests are conducted as stand-alone tests or combined with other activity (e.g. maintenance), and service availability is impacted for longer than the notified window, DCC would need to declare an Incident (though please note that we take every possible measure to avoid this outcome) For clarity, BCDR testing conducted during Planned Maintenance windows is carefully coordinated using detailed, orchestrated runbook timings and an established rollback plan. This structured approach ensures that all activity remains safely within the Maintenance window, supported by continuous monitoring of progress and timings.

Question 10			
Respondent	Category	Comments	SECAS Response
			- On occasion, and only by exception, DCC may schedule a BCDR outage that requires a longer, 8-hour slot. These extended windows are deliberately planned for weekends to provide additional contingency. In the unlikely event of an overrun caused by an unresolved issue, this scheduling allows us the necessary grace period to initiate the DCC Major Incident Procedure and restore the service.” - DCC provide details of BCDR Tests in the monthly Maintenance communication, DCC believe this provides the information required, detailing the test activity. DCC can consider further if required – including formalising this provision of information.