

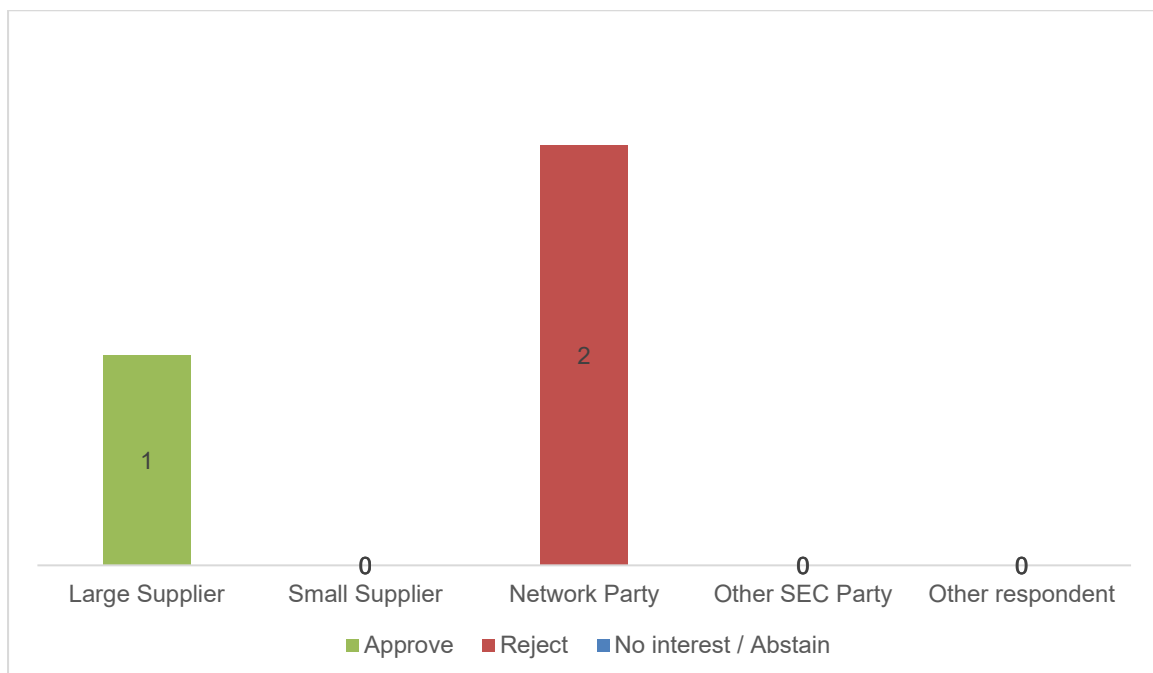
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MP289 'BCDR Engagement Modification Report Consultation responses

About this document

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

Summary of responses



Question 1: Do you believe that MP289 should be approved or rejected?

Question 1					
Respondent	Category	Response	General SEC Objective(s)	Rationale	SEC Change Team Response
Utilita Energy Limited	Large Supplier	Approve	None Provided	We agree that the solution put forward will resolve the identified issue. We would like to stress that this would be based on the rationale between what the DCC class as service impacting and non-service impacting is sufficient to not have an impact on consumers and suppliers where the DCC have identified that the BCDR testing will have no impact.	N/A
SP Electricity North West	Network Party	Reject	None Provided	Whilst we agree with the solution in principle for improving efficiency by reducing unnecessary engagement for non-impactful tests, we have concerns with the solution and legal text and as such are rejecting. We set out in detail our responses in the refinement consultation. Our understanding is the solution and legal text remain the same from the refinement consultation and the DCC have made no changes in response to SEC party concerns. In addition, there appears to be no central SECAS triage of the DCC feedback specifically, regarding the following DCC comments: <i>“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</i>	The SEC Change Team acknowledge the views of the respondent and references to the lack of updates to the solution and legal text following refinement consultation respondents. We also note the points raised regarding the feedback provided by the DCC with regards to concerns/feedback raised by Parties within their Refinement Consultation responses.

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				<i>categorisations have proven to be inaccurate or where Parties have been unexpectedly impacted.”</i> Work on SEC Modification MP293 (which SP ENW has proposed) has evidenced a clash with a BCDR test (20th October 2024) with Storm Ashley (18-24th October 2024) which resulted in Network Operators, being unable to communicate with smart meter devices. We require this functionality to determine if there is a power outage and when power has been restored. This has a direct detrimental impact on Network Operators power outage management and their customers. The DCC and SECAS is aware of this impact via the MP293 refinement work. Details of the impact is set out in the MP293 problem statement. Due to the repeated clashes between Storms and DCC planned outages (inc BCDR tests): four clashes in the last 15 months - Network Operators are collative supportive of SECMP293. Whilst refining this modification, Network Operators as an interim measure have been requesting deferment of DCC planned outages which clash with Storms. The DCC have rejected these requests. The BCDR plan for 26/27 sets out that 3 of the 7 BCDR tests will impact power outages and they will 8 hours long each which causes significant issues to a Network Operators ability to restore customers and the safety of their staff during adverse weather.	The SEC Change team did pass on the feedback, and following review, it was the Proposer’s view that no changes were needed to the solution or the legal drafting. However, the Proposer did make updates to the BCDR Testing Approach document to help clarify the differences between an impacting and non-impacting test and to provide some additional information and examples where they thought it might be useful. The DCC provided the SEC Change Team with feedback to the comments raised in the Refinement Consultation to provide rationale as to why they did not make changes outside of the updates to the BCDR Testing Approach document. The SEC Change

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				We support the NGED response in that we request clarifications and improvements be made as follows: • 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. We would also require assurance that any non-impactful test that becomes impactful restarts the full notification cycle.	Team relayed these using the SEC Change Team response area of the collated responses document. We welcome the additional context surrounding DNO impacts that relate to BCDR Testing and note the MP293 specific evidence examples. While MP289 is not seeking to amend the current approach to testing, outside of the notification and engagement requirement changes set out in the legal text, the SEC Change Team will pass this feedback onto the Proposer for consideration. We acknowledge the request for further improvement. We note that in respect of that the Proposer, they wish to move forward with the current situation as is, which

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					they are entitled as Proposer to do. That said, the areas of improvement highlighted are the same as those highlighted in response to the Refinement Consultation. The Proposer's response to these areas of improvement can be found in the Collated Refinement Consultation Responses document .
National Grid Electricity Distribution	Network Party	Reject	None Provided	We feel that MP289 should be rejected. Whilst we recognise the DCC's intention to streamline engagement, this modification reduces visibility and assurance for SEC Parties in an area that directly affects operational risk. The proposal removes key safeguards without providing a sufficiently robust alternative governance framework. One additional point we wish to highlight is the SECAS response, which downplays the likelihood of downtime by focusing primarily on Supplier impacts and referencing weekend scheduling. This does not reflect DNO operational realities. The recent BCDR test plan includes seven tests, three of which would directly affect power-outage-related activities, and we have already seen a clash between a BCDR test and Storm Ashley.	Please see the SEC Change Team response to points raised by SP Electricity North West above.

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				Whilst the DCC has scheduled future tests to avoid winter, this is not guaranteed as it is not a codified requirement. Our initial thoughts of 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. We would also require assurance that any non-impactful test that becomes impactful restarts the full notification cycle	

Question 2: Please provide any further comments you may have.

Question 2			
Respondent	Category	Comments	SEC Change Team Response
Utilita Energy Limited	Large Supplier	None Provided	N/A
SP Electricity North West	Network Party	As the proposer of MP293 we will be requesting the DCC is mandated to the define the network impact on Network Operators in any planning for DCC planned outages (inc BCDR tests) and avoiding winter as part of the legal text changes for MP293.	The SEC Change Team note the comments will continue to work with the Proposers of both modifications to ensure all elements of discussion, suggestion and queries are accurately captured and reflected within relevant Modification Reports and other documentation.
National Grid Electricity Distribution	Network Party	None Provided	N/A