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MP289 'BCDR Engagement'

Modification Report

Version 1.1

15 April 2026

Corporate member of
Plain English Campaign
Committed to clearer
communication

592



About this document

This document is a Modification Report. It sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document also has three annexes:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex B** contains the draft Data Communications Company (DCC) Business Continuity and Disaster Recovery (BCDR) Testing Approach document.
- **Annex C** contains the collated Refinement Consultation responses document.

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1. Summary

This proposal was raised by David Rollason from the DCC.

To ensure that DCC services remain resilient, and to mitigate against unforeseen outages, the DCC conducts BCDR Testing. The SEC sets out requirements regarding the DCCs engagement with SEC Parties ahead of BCDR Testing activities taking place. The DCCs approach to BCDR Testing has evolved over time and the Proposer feels the current SEC engagement requirements may no longer be fit for purpose in every instance of BCDR testing.

The Proposer would like to amend the current requirements for engagement and notification to ensure that Parties are notified ahead of BCDR Testing where it is expected to impact the provision of DCC services. For the avoidance of doubt, the DCC is not suggesting a change to the 60 Working Day notice period.

The DCC would also like to formalise the production and availability of the DCCs [BCDR Testing Approach document](#) with a requirement to review the approach on a regular basis.

This modification will be a Self-Governance modification. Costs are limited to SEC implementation costs. If this modification is approved, the implementation approach is to include MP289 within the June 2026 SEC Release (26 June 2026) and will impact all DCC Users.

2. Issue

What are the current arrangements?

BCDR Testing

The purpose of BCDR Testing is to ensure DCC services are resilient and there are mitigations in place against unforeseen outages, ultimately ensuring that the DCC services can continue to be provided with minimal disruption or be effectively recovered in the event of a disaster or unforeseen service-based outage.

SEC Section H 'DCC Services' sets out provisions related to BCDR. This includes how the DCC must engage with SEC Parties ahead of testing. The current provisions in SEC Section H Clause H10 'Business Continuity' were put in place under [SECMP0029 'Business Continuity and Disaster Recovery Testing Amendments'](#) in 2018 and require the DCC to consult and notify SEC Parties and the SEC Panel of its intention to carry out BCDR testing. This includes providing a BCDR Test Schedule at least 60 Working Days before any test is due to commence.

The rationale for putting in place a 60 Working Day notice period was to give SEC Parties time to plan and issue communications to consumers and stakeholders who may be impacted by BCDR Testing (e.g. consumers who have Pre-Payment Meters (PPM) installed who may not be able to top up during an outage).

The DCC currently chooses to plan and engage with SEC Parties on BCDR Testing one year in advance. As part of this engagement, the DCC issues a consultation each year on its BCDR Annual Testing Schedule. The DCC also provides SEC Parties with a draft annual outage plan which includes Planned Maintenance activities as well as BCDR activities.

What is the issue?

The DCCs approach to BCDR testing has evolved since SECMP0029 was first implemented and current requirements do not take the DCC's approach to testing into account. As a result, the DCC feels that the current SEC Party engagement requirements are no longer appropriate in every instance of BCDR testing.

Some testing does not impact DCC Users or services. For example, desk-based exercises like discussion-based, scenario and/or simulation testing, as well as tests which run in parallel to other activities. Furthermore, some BCDR testing is completed as part of Planned Maintenance and the SEC requires the DCC to notify SEC Parties 20 Working Days before the start of the month where there is Planned Maintenance activities scheduled rather than 60 Working Days in advance.

To complete engagement and notification activities efficiently, the DCC consults and notifies for a full calendar year of BCDR Testing. Therefore, the planning for BCDR Testing starts many months in advance. While this is efficient, it can increase the likelihood of amendments needing to be made and further engagement being required.

It should also be noted that SEC Parties currently have no formal visibility over how the DCC approaches its BCDR Tests in terms of the assessment on, and the approach to, testing.

What is the impact this is having?

Consulting on all BCDR Test activities, and providing notice 60 Working Days in advance, where the activity will not impact service provision, adds additional complexity for little benefit. This also limits the flexibility to move or reschedule a non-service impacting test.

In addition to this, SEC Parties currently have no formal visibility over how the DCC approaches its BCDR Tests in terms of the assessment on, and the approach to, testing. This means Parties may have little insight into the benefits of testing and why its conducted.

Impact on consumers

This Modification is not expected to impact consumers directly but may impact how Suppliers issue communications to consumers that may be impacted by outages related to BCDR Testing.

Respondents to the Refinement Consultation have indicated that Consumers may benefit from reduced risk of prolonged outages and clearer Supplier communications during BCDR events. Transparency in planning supports better coordination. Consumers may also benefit from MP289 where it is implemented with the clarifications suggested by Refinement Consultation respondents.

3. Solution

Proposed Solution

The Proposer is seeking to amend the current requirements for engagement and notification regarding BCDR Testing, considering the DCC's current approach to BCDR testing.

The current requirements will be updated to ensure that the DCC is only required to notify Parties ahead of BCDR testing that is expected to impact the provision of DCC Services.

For the avoidance of doubt, the DCC will continue to include BCDR testing that is not expected to impact the provision of DCC services in its annual consultation as it does now. However, not requiring 60 Working Days' notice for these BCDR tests will allow greater flexibility for change throughout the year if needed.

The Proposer is also looking to introduce requirements on the DCC to formalise the production and availability of the DCCs BCDR Testing Approach document, these requirements include:

- The DCC publishing the BCDR Testing Approach Document on the DCC website, for information purposes;
- Ensuring the document is kept under review and updated as may be required from time to time;
- Ensuring the document includes, as a minimum, the following information:
 - BCDR Testing approach (planning, execution, post-test reviews and testing of new services before go-live);
 - Future considerations for opportunities to reduce the impact to Service disruption; and
 - Engagement approach with Parties and notifying them of BCDR testing.

For the avoidance of doubt, the DCC has not sought a review or made any amendments to the current approach to BCDR testing as part of this Modification and have only sought to make available more detailed information about the approach.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
✓	Electricity Network Operators	✓	Gas Network Operators
✓	Other SEC Parties	✓	DCC

The DCC will be impacted by this Modification as it will need to produce, publish and managed the BCDR Testing Approach document.

SEC Parties, who are also DCC Users, will be impacted as there will be changes to how they are notified and engaged regarding BCDR testing that is not expected to impact the provision of services.

DCC Systems

DCC System changes

There are no impacts on DCC systems as a result of this Modification.

DCC System traffic

There are no impacts on DCC system traffic as a result of this Modification.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section H 'DCC Services'

The changes to the SEC required to deliver the Proposed Solution can be found in Annex A.

The current draft version of the DCC BCDR Testing Approach document can be found in Annex B.

Technical specification versions

There are no changes to Technical Specification versions as a result of this Modification.

Devices

There are no impacts to Devices as a result of this Modification.

Consumers

This Modification is not expected to impact consumers directly but may impact how Suppliers issue communications to consumers that may be impacted by outages related to BCDR Testing.

Respondents to the Refinement Consultation have indicated that Consumers may benefit from reduced risk of prolonged outages and clearer Supplier communications during BCDR events. Transparency in planning supports better coordination. Consumers may also benefit from MP289 where it is implemented with the clarifications suggested, by Refinement Consultation respondents:

- 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.

Other industry Codes

There are no impacts on any other industry Code.

Greenhouse gas emissions

There are no impacts on greenhouse gas emissions.

5. Costs

DCC costs

There are no DCC costs.

SECAS costs

The estimated SECAS implementation cost to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry; and
- Updating the SEC website with a link to the final version of the DCC BCDR Testing Approach document.

SEC Party costs

Respondents to the Refinement Consultation responses have indicated that there would be no material costs as a result of this modification.

Respondents advised that any minor costs would relate to internal governance reviews and stakeholder engagement. They also note that no System changes are required.

6. Implementation approach

Agreed implementation approach

The Change Sub-Committee (CS) has agreed an implementation date of:

- **25 June 2026** (June 2026 SEC Release) if a decision to approve is received on or before 11 June 2026; or
- **5 November 2026** (November 2026 SEC Release) if a decision to approve is received after 11 June 2026 but before 22 October 2026.

Responses to the Refinement Consultation have advised either no lead time, minimal lead time or 2-4 weeks lead time noting the following activities will need to take place prior to the implementation of the modification:

- Reviewing the updated approach document.
- Updating internal governance processes if required.
- Communicating changes internally.

7. Assessment of the proposal

Areas for assessment

Production and availability of the DCC's BCDR Testing Approach document

In collaboration with SEC Parties, the DCC has documented its approach to BCDR Testing. The DCC published an initial draft of this BCDR Test Approach document alongside its [consultation on the April 2025 – March 2026 Testing Schedule](#).

The document created to provide Parties with additional insight into the DCC's approach to proving resilience and conducting BCDR Tests and included information on the following areas:

- Introduction
- Background
- DCC resilience
- BCDR Testing approach
- Future considerations and opportunities
- Customer engagement and planning
- Continuous improvement and review
- Glossary
- Appendices (x4)

The DCC's consultation on this approach document took place during December 2024 and January 2025. The DCC posed the following question as part of its consultation:

"Having reviewed the draft BCDR Testing Approach document, do you have any comments on the approach, or any additional sections / details that should be included in final documentation?"

There were three responses to this question. The details of which can be found in the DCCs [Conclusion on the April 2025 – March 2026 BCDR Test Schedule](#) document.

The DCC has continued to update the approach document following receipt of the above responses and in response to feedback during the progression and development of MP289.

[The most recent version of this document is v0.7](#) (Annex B to this document).

Are the current requirements for engagement and notification regarding BCDR Testing still fit for purpose?

With the DCCs approach to BCDR testing having evolved since SECMP0029 was first implemented the DCC do not feel the requirement to consult and provide 60 Working Days' notice of testing to SEC Parties is appropriate in every instance of BCDR testing.

The DCC feels that SEC Parties only need to be notified and engaged with when testing is expected to impact the provision of DCC Services. Whilst the DCC still plans to consult and notify parties a full calendar year in advance of BCDR testing, some testing, like desk-based exercises that are

discussion-based, as well as scenario and/or simulation testing, may be conducted outside of the 60 Working Days' notice period as it is not expected to impact the provision of services.

Sub-Committee input

The SEC Change Team have engaged the Chairs from the Operations Group (OPSG), the Privacy Sub-Committee (PSC), 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.

The SEC Change Team have sought input from the following Sub-Committees:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	Assessed any potential operation impacts as a result of the potential solution.
PSC	No input required
TABASC	Assessed any potential technical impacts as a result of the potential solution.
SSC	No input required
SMIKI PMA	No input required
TAG	Assessed any potential technical impacts as a result of the potential solution.

Observations from Sub-Committees

Discussions at Change Sub-Committee

April 2025

A summary of the Modification was provided to the Change Sub-Committee (CSC) on 15 April 2025. The CSC did not have any specific feedback or comments on the Modification.

The CSC determined that the issue and impact is clearly defined and understood, that it should be converted to a Modification Proposal, and should progress to refinement.

February 2026

A summary of the Modification, as well as responses to the Refinement Consultation, were provided to the Change Sub-Committee (CSC) on 17 February 2026.

A CSC member asked if further clarify regarding the review cycle for the DCC Testing Approach Document could be provided and suggested a change to the legal text to indicate either annual or bi-annual. The SEC Change Team advised that the Proposer was not seeking to amend the legal text at this time but that they would feed the question back for them to consider before the Modification is issued for Report Consultation.

The Change Team discussed the matter with the Proposer who has agreed to update the Testing Approach Document to indicate how often the document would be reviewed. However, they did not feel a change to the legal text was necessary at this time. The Proposer has provided an updated

version of the [BCDR Testing Approach Document \(v0.7\)](#) which can be found in Annex B to this document.

The CSC did not have other specific feedback or comments on the Modification.

The CSC determined that MP289 should be progressed to Report Phase and issued for Report Consultation. The CSC also approved the Modification Report, approved the Implementation Approach and agreed that MP289 should be progressed as a Self-Governance Modification.

Discussions at OPSG

April 2025

The issue, solution and proposed next steps were presented to OPSG on 28 April 2025.

The OPSG raised concerns about instances where it had been indicated that no impact to service would result in no advance notification of BCDR testing, noting that there had been instances where Incidents had occurred where no impact was expected.

The Proposer confirmed that the DCC would consider this as part of its risk-based assessment, noting that if a live test had not been completed in a while, then it would conduct a full live test. They added that the aim was to reduce down-time, ensure there was a balance in terms of risk assessment with conducting live testing and ensure there was a reliable system that would provide resolution if an unplanned outage occurred.

The OPSG questioned whether the Modification will adapt to potential changes within technology and it was confirmed that it would consider the risk-based approach as part of the BCDR Test Approach Document, which would be adapted in future as required.

The OPSG discussed whether they would still endorse the outage plan which included the BCDR events, noting that was assumed given there had been no change proposed by the DCC. It was confirmed that there had been no change and advised that there was no requirement in the SEC on the DCC to seek endorsement from OPSG, however, the DCC recognised the impact it would have on the OPSG and would continue to provide information to the OPSG.

The SEC Change Team confirmed to the OPSG that BCDR testing had not been delegated by Panel, therefore the DCC was obligated to advise Panel, noting that it was included as part of the annual outage plan and did come to OPSG as that was the process followed currently.

October 2025

The issue, solution and draft legal text were presented to OPSG on 27 October 2025.

The OPSG were advised that the DCC is not proposing to change the actual testing methodology but rather to improve transparency and communication with SEC Parties. The purpose of the BCDR Testing Approach Document was provide insight into how the DCC planned and executed BCDR tests. The DCC emphasised that the document was internal to the DCC and was updated as needed, particularly when new Service Providers or technologies were introduced. The DCC are not proposing to consult on or seek formal approval for updates to the document. However, they welcome feedback from SEC Parties that feel additional information should be included.

A question was raised regarding whether the document had been reviewed by any other Sub-Committees. The SEC Change Team responded that it was scheduled to go to TABASC next.

The OPSG sought clarification on the 60-working-day notification rule, asking whether it would apply only to tests expected to impact DCC services. The DCC confirmed that this was correct and explained that this change would allow the DCC to focus consultation efforts on impactful tests while maintaining flexibility for non-impactful ones. For example, if a test was purely desk-based and had no service impact, the DCC could adjust its timing without triggering the 60 Working Day notice period.

A question was raised regarding how the DCC determined whether a test would impact service provision. The DCC explained that it already performed this assessment during its annual consultation process. For example, in the previous year, 13 tests were proposed, and 10 were identified as having no expected service impact. They noted further that some tests were as simple as verifying runbooks or ensuring staff know which buttons to press, and these would clearly not affect live services.

The importance of understanding the outcome of the upcoming TABASC discussion was emphasised, especially since TABASC had been asked to review the BCDR Testing Approach Document. This was acknowledged and members were invited Members to provide any further feedback via SECAS@talan.com.

Discussions at TAG

May 2025

The issue, solution and proposed next steps were presented to TAG on 28 May 2025.

An overview of the Modification was presented. There were no comments or questions raised by TAG members.

October 2025

The SEC Change Team provided details of the issue, solution and the draft legal text to the TAG ahead of its meeting on 29 October 2025.

Following discussion and review, the SEC Change Team was advised that the TAG Chair had no concerns and therefore didn't feel the modification needed to be presented to the TAG.

Discussions at TABASC

June 2025

The issue, solution and proposed next steps were presented to TABASC on 5 June 2025.

TABASC members welcomed the intent of the modification but raised some concerns. A TABASC member emphasised the importance of understanding the potential impact of BCDR testing on end Users and questioned whether the DCC currently has sufficient input from Service Users when planning such tests. Another TABASC member noted that the modification, in its current form, may not go far enough in addressing the concerns raised by industry, particularly around the scope and necessity of certain tests and the lack of influence Service Users have in shaping them.

The TABASC Chair suggested that TABASC members take time to consider whether the proposed modification aligns with the committee's expectations for engagement and oversight. He noted that the current proposal focuses heavily on visibility and documentation but may not provide sufficient mechanisms for Service Users to influence the scope or timing of BCDR activities.

The TABASC agreed to revisit the modification at a future meeting once further development work has been completed and encouraged members to provide feedback on the current draft outside of the meeting.

November 2025

The issue, solution and draft legal text were presented to TABASC on 6 November 2025.

The TABASC supported the initiative though they requested further information on testing schedules generally and how responsibilities would be shared between the DCC and Service Users. It was agreed that there would be ongoing engagement with regards to the BCDR framework going forwards.

Discussions at Working Group

June 2025

The issue, solution and proposed next steps were presented to the SEC Workgroup on 3 June 2025.

The Working Group considered the information provided by the SEC Change Team on the issue identified and the Proposed Solution.

A Working Group member advised that they had read the DCC BCDR Testing Approach document provided and noted that from a technical perspective, it mentions stakeholder engagement but not specifically how this will happen. They added that all the process governance sits with the DCC whereas other arrangements go through TAG. They advised that when dealing with BCDR matters, customers should be fully informed.

The DCC responded noting that they had made a note of the comment and would feed it back.

A Working Group member asked for further clarification regarding the information that is and is not included in BCDR notifications. Another Working Group member responded that the DCC provide information with regards to which Service Providers will be conducting testing and when. Then closer to the time of a test, further details regarding the testing and what can be expected is provided.

A Working Group member noted that the DCC will know what requires testing when it is arranged with Service Providers (SPs). The DCC confirmed that this is the case, but the detail is provided closer to the time of the test as it would be too much information to include in the notifications.

A Working Group member asked how changes to this document will be managed. They added that the testing approach document as per SEC Section H, when deviated from, gets varied. They asked if the DCC Testing Approach document will be treated in the same way. Another Working Group member responded that they would take that question away and confirm ahead of the next Workgroup meeting.

The Working Group agreed that the SEC Change Team should work on the Modification and present progress at the next available meeting.

August 2025

The issue, solution, legal drafting and proposed next steps were presented to the SEC Working Group on 6 August 2025.

A member of the Working Group questioned if the draft legal text was suggesting that the DCC would be simply publishing the document as opposed to consulting on this. The DCC advised that MP289 is looking at notifying how the BCDR Testing dates will impact DCC Services. The SEC is already descriptive in requiring the DCC to carry out BCDR testing in the least disruptive manner possible.

Another member of the Working Group questioned whether the BCDR Testing Approach Document would be hosted on the SEC website. The SEC Change Team proposed that the document be hosted on the DCC website, with the SEC linking to it and redirecting Users to the DCC document. They added that the DCC would be responsible for keeping the document up to date and it makes sense for them to host it. The DCC agreed with the approach.

The Working Group member questioned whether MP289 would be presented to the wider industry, outside of the Sub-Committees. The DCC advised that MP289 will not be affecting any other areas, but they will be confirming with the BCDR team. This was later confirmed as having no wider impacts.

The Working Group agreed that the DCC should confirm whether MP289 will have any wider impacts and also present the Modification to the OPSG. The DCC later confirmed that there will not be any wider impacts and the OPSG and TABASC subsequently reviewed the solution and draft legal text and raised no comments or concerns, with TABASC voicing support.

8. Case for change

Business case

The Proposer would like to amend the current requirements for engagement and notification to ensure that Parties are only notified ahead of BCDR Testing where it is expected to impact the provision of DCC services. For the avoidance of doubt, the DCC is not suggesting a change to the 60 Working Day notice period.

The DCC would also like to formalise the production and availability of the DCCs [BCDR Testing Approach document](#) with a requirement to review the approach on a regular basis.

There is minimal cost to implement these changes.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification will better facilitate SEC Objective (b¹) and (g²) as it will allow the DCC to be more efficient with regards to BCDR testing and will simplify and focus communications related to BCDR testing.

¹ (b) enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence.

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

Industry views

All respondents to the Refinement Consultation feel that the MP289, in its current form, will not better facilitate the SEC Objectives, with one respondent noting specifically SEC Objectives (f³) and (g). One respondent noted that 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.

Views against the consumer areas

Improved safety and reliability

This change is neutral in this area.

Lower bills than would otherwise be the case

This change is neutral in this area.

Reduced environmental damage

This change is neutral in this area.

Improved quality of service

Consumers may benefit from reduced risk of prolonged outages and clearer Supplier communications during BCDR events. Transparency in planning supports better coordination.

Consumers may also benefit from MP289 where it is implemented with the clarifications suggested, by Refinement Consultation respondents:

- 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.

Benefits for society as a whole

This change is neutral in this area.

³ (f) the sixth General SEC Objective is to ensure the protection of Data and the security of Data and Systems in the operation of this Code.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Presented to Issued Group	5 Mar 2025
Draft Proposal raised	8 Apr 2025
Presented to CSC for initial comment	15 Apr 2025
Modification discussed with OPSG	28 Apr 2025
Modification discussed with TAG	28 May 2025
Modification discussed with the Working Group	4 Jun 2025
Modification discussed with TABASC	5 Jun 2025
Modification discussed with Working Group	6 Aug 2025
Modification discussed with OPSG	27 Oct 2025
Modification discussed with TABASC	6 Nov 2025
Refinement Consultation	10 Dec 2025 – 9 Jan 2026
Modification Report approved by CSC	17 Feb 2026
Modification Report consultation	17 Feb – 10 Mar 2026
Change Board vote	25 Mar 2026

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
PPM	Pre-Payment Meter
PSC	Privacy Sub-Committee
SEC	Smart Energy Code
SEC Change Team	The Smart Energy Code Administrator and Secretariat Change Team
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SPs	Service Providers
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Advisory Group

Appendix 3: DCC workshop discussions

Change Board vote (March 2026)

The SEC Change Team presented MP289 to the Change Board at its meeting on 15th March 2026, providing an overview of the modification and a summary of the Modification Report Consultation responses.

A Change Board member (Supplier) raised concerns regarding the rejection comments received from Network Parties to the Modification Report Consultation, highlighting their preference for the final vote on the Modification to be deferred until the comments were addressed. Other Change Board members, specifically Network Parties, supported this suggestion, adding that the introduction of the proposed solution for this Modification would, in their view, restrict the solution discussed as part of [MP293 'Deferment of DCC Planned Maintenance during Adverse Weather'](#). It was also noted that BCDR is service impacting and categorised as planned maintenance. Therefore, there is concern that this approach and the timings would impact the ability to implement the 'Enhanced Availability' solution in MP293.

The DCC advised that the Modification seeks to streamline engagement for non-service impacting tests only. They gave the example of desk-based exercises and noted that service-impacting tests would continue to be subject to full notification and consultation requirements. The SEC Change Team referred the Change Board to the proposed BCDR Testing Approach document where additional definitions and examples of service-impacting, and non-service-impacting tests can be found. They added that the DCC have updated this document following similar Refinement Consultation feedback.

A Change Board member (Supplier) questioned how BCDR engagement related to adverse weather events. The DCC clarified that BCDR testing that may impact service provision are planned outside of the winter period as much as reasonably practicable. However, the approval of MP289 would not deter the development of MP293, as the aim of MP293 would be to reduce the impact specifically around storm events. SEC Change Team added that the drafted legal text for MP293 states that the enhanced solution would apply to any DCC planned service disruptions, which includes BCDR and this should provide some reassurance to SEC Parties that the enhanced availability will be switched on during BCDR testing, if it coincides with an adverse weather event.

A Change Board member (Supplier) questioned what further work would be required if the Modification did not proceed to vote at this meeting. Two Change Board members (Network Parties) agreed that this Modification should be subject to a further workshop with Network Parties to ensure the legal text is secured against potential scenarios of mis-categorisation, where a BCDR test was prescribed as non-impacting but did end up having an impact on services. The DCC clarified that in such scenarios, DCC would be non-compliant with its SEC obligation to consult and notify, which is not the intention of the Modification. They provided an example of a desk-based scenario whereby relevant team members were scheduled to meet in a DCC meeting room to flip through documents to check their knowledge of scenarios. They advised that in the event of another DCC meeting taking precedent, and the BCDR desk-based meeting needing to be move to another day, the DCC would need to provide 60 Working Days' notice of this change. They emphasised that such a BCDR test would not impact Parties, but the current wording in the SEC still requires a 60 Working-Day notice period and consultation.

A Change Board member (Supplier) noted that they shared the same concerns as Network Parties regarding potential mis-categorisation. The DCC reiterated that it will have a strong view of service

impacting and non-service impacting testing, and its wish is to remain compliant with the SEC. They set out the benefits of the Modification in relation to MP293, noting a deference to planned maintenance that includes BCDR testing being made to account for adverse weather, the BCDR testing will not be able to resume two days later, as the DCC would be in breach of the 60 Working Day-window notice and consultation. In their view, this Modification is not impacting MP293 but rather supports it.

The Change Board considered MP289 and after canvassing views across all Party categories, the Change Board Chair concluded that there was broad support for deferring a decision on this modification to facilitate further engagement to considered concerns raised by Network Parties.

DCC Workshop discussions (April 2026)

The SEC Change Team facilitated a workshop for MP289, which was held on 14 April 2026. The purpose of this workshop was to try to resolve concerns raised by Network Parties that led to deferral of the modification at the March 2026 Change Board. The discussion focused on improving clarity, reducing ambiguity, and ensuring Network Parties were comfortable with proposed changes to BCDR notification requirements.

The DCC attended the meeting and explained how its BCDR testing approach has matured in recent years, noting that there is now a strong emphasis on risk-based testing, accurate impact assessments, and greater transparency through published documentation.

The attendees considered the concerns raised by Network Parties as part of the Modification Report Consultation that led to the Change Board deferral. The Discussions were centred on the following:

- **Ambiguous phrasing in legal text that could introduce uncertainty, specifically the use of “expected to impact”:** It was noted that this wording has led to discomfort around the possibility of reclassification mid-test and there was a preference for clearer, more definitive wording. The DCC agreed to remove the word “expected” from the proposed legal text, tightening the wording to provide greater certainty.
- **Risk of mis-categorisation of BCDR tests:** Networks sought clarity on when a test would be reclassified and what safeguards exist to prevent unexpected impacts (particularly during storm events). The DCC confirmed that tests would be halted if a potential impact was identified prior to execution, any unanticipated impacts would trigger an incident process and changes from non-impacting to impacting tests would follow full consultation and notice requirements.
- **Interactions with MP293 (Enhanced Availability):** A concern was raised that MP289 could delay or undermine the implementation of MP293. The DCC clarified that MP289 is procedural and does not reduce the number or scope of service impacting BCDR tests. They added that MP289 does not affect the technical capability or delivery of enhanced availability under MP293. The SEC Change Team confirmed that MP289 and MP293 are viewed as separate and not interdependent. They also advised that should there be any additional points raised via SMSG, they could be reflected in Change Board documentation if provided in enough time.
- **Clarification on impacting vs non-service impacting tests:** The DCC Clarified that definitions and rationale are documented in the BCDR Testing Approach Document. DCC invited further feedback if additional clarity or detail was required. The SEC Change Team highlighted relevant existing provisions in SEC Section H (Service Management and Incident Management).

There was general agreement that concerns raised by Network Parties had been addressed sufficiently for MP289 to proceed. Attendees also agreed to the removal of ambiguous wording from

legal text suggested by the Proposer. It was also agreed that Smart Metering Steering Group (SMSG) discussions may generate further feedback, and that these should be shared promptly if deemed relevant so they can be included in relevant documentation. The DCC attended the SMSG meeting on 14 April 2026 and advised the SEC Change Team that members were largely happy with the very low risk of unexpected impacts of BCDR tests (e.g. miscategorisation) but were still interested in having site of the legal text changes once agreed. The DCC also indicated that the concerns raised regarding links to MP293 were less of an issue as that Modification was now looking enhanced availability rather than deferral.

The SEC Change Team agreed to update the legal text, capture a summary of this workshop in the [Conclusions Report](#) and uplift documentation for Change Board.