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MP289 'BCDR Engagement'

Modification Report

Version 0.4

9 December 2025

Corporate member of
Plain English Campaign
Committed to clearer
communication

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About this document

This document is a Modification Report. It currently 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 two 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.

Contact

If you have any questions on this modification, please contact:

Talia Lattimore

020 7079 1010

talia.lattimore@talan.com

1. Summary

This proposal was raised by David Rollason from the DCC.

In order 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 for the Proposed Solution are yet to be determined.

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.

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 that is not expected to impact the provision of services.

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.

6. Implementation approach

Recommended implementation approach

SECAS is recommending 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 November 2026.

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 v0.5 (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 feel 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

SECAS 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.

SECAS 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 CSC

April 2025

A summary of the Modification was provided to the 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.

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.

SECAS 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 27th 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 Code Administrator 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. The Code Administrator acknowledged this and agreed to follow up and 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 Code Administration 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 Code Administration 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. The Code Administrator committed to ongoing engagement with regards to the BCDR framework.

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 SECAS 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 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 noted that the DCC will know what requires testing when it is arranged with 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 SECAS 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 SECAS website. SECAS proposed that SECAS hosts a link to the website, redirecting Users to the DCC document. They added that the DCC would be responsible for keeping the document up to date. 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.

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
<i>Modification Report approved by CSC</i>	<i>16 Dec 2025</i>
<i>Modification Report consultation</i>	<i>17 Dec 2025 – 12 Jan 2026</i>
<i>Change Board vote</i>	<i>25 Feb 2026</i>

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
SECAS	The Smart Energy Code Administrator and Secretariat
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