

This document is classified as **Clear** in accordance with the Panel Information Policy. Recipients can distribute this information to the world, there is no limit on disclosure. Information may be shared without restriction subject to copyright.

MP289 ‘BCDR Engagement’

Conclusions Report – version 1.0

About this document

This document summarises the responses received to the Modification Report Consultation and the decision of the Change Board regarding approval or rejection of this modification.

Summary of conclusions

Change Board

The Change Board voted to **approve** MP289. It believed the modification better facilitated SEC Objectives (b)¹ & (g)².

Modification Report Consultation

SECAS received three responses to the Modification Report Consultation. One respondent believed that the modification should be approved, though they did not specifically reference any SEC Objectives being supported by this change.

Two respondents believe that the modification should be rejected. There were no specific views on impacts against the SEC Objectives provided.

¹ 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 facilitate the efficient and transparent administration and implementation of this Code.

Modification Report Consultation responses

Summary of responses

Views in support of MP289 being approved

The respondent who supported the approval of MP289 advised that agree that the modification will resolve the identified issue. They added that is 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.

Views in support of MP289 being rejected

Two respondents felt that MP289 should be rejected. One agreed with the solution in principle and for improving efficiency by reducing unnecessary engagement for non-impact tests. However, they continued to have some concerns with the solution and legal text.

The other respondent acknowledged DCC's intention to streamline engagement. However, they feel the modification removes key safeguards, reduces visibility and assurance for SEC Parties in an area that directly affects operational risk, and does not provide a sufficiently robust alternative governance framework.

Both respondents referenced the ongoing work being undertaken for [MP293 'Deferment of DCC Planned Maintenance during Adverse Weather'](#) and the evidence given regarding a clash with BCDR tests and Storm Ashley (18-24th October 2024), as well as the impacts of those clashes. They also referenced the most recent BCDR Test Plan, noting that 3 of the 7 tests will impact power outages which causes significant issues to a Network Operators ability to restore customers and the safety of their staff during adverse weather.

Both respondents requested the following clarifications and improvements:

- 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.

In addition to the above, one respondent felt that the impacts on Networks weren't highlighted enough.

Change Board vote (March 2026)

The SEC Change Team presented [MP289 'BCDR Engagement'](#) 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.

The Change Board considered the responses and discussed the concerns raised by Network Parties. 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 deferring the final vote 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 workshop was attended by the DCC, two Network Parties and an Ofgem representative. All attendees were provided with an overview of MP289 as well as a more detailed explanation as to how the DCC's 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.

Network concerns discussed at Change Board, and submitted as part of the Modification Report Consultation, centred on the proposed legal text wording of "expected to impact", the possibility of mis-categorisation, and perceived links to MP293. These were addressed through clarification of safeguards, confirmation of incident processes, and reassurance that MP289 is procedural and does not impact any potential 'Enhanced Availability' capabilities.

Overall, the workshop successfully closed the main issues raised by Network Parties and there was general agreement that concerns had been addressed sufficiently for MP289 to proceed. Attendees also agreed to the removal of ambiguous wording from the 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 with the SEC Change team if deemed relevant so they can be included in relevant documentation.

The SEC Change Team agreed to update the legal text, capture a summary of this workshop in the [Conclusions Report](#) and uplift documentation for the April 2026 Change Board.

Change Board vote (22 April 2026)

Change Board vote

The Change Board voted to **approve** MP289 under Self-Governance.

The vote breakdown is summarised below:

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	6	0	1	Approve
Small Suppliers	3	0	0	Approve
Network Parties	3	0	0	Approve

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Other SEC Parties	2	0	0	Approve
Consumer Representative	1	0	0	Approve
Overall outcome:				APPROVE

One Large Supplier requested to **Abstain** from the MP289 Change Board Vote. The member requested to abstain from the vote as they felt this modification had a greater impact on Network Parties, and wished for the final vote to be primarily driven by said Network Parties as a result.

Views relating to the General SEC Objectives

Objectives (b) & (g)

The Change Board believed that MP289 will better facilitate SEC Objective (b) & (g).

Change Board discussions

The SEC Change team provided an overview and recap to the Change Board of MP289 to-date, including the additional workshop held on the 14 April 2026 following the March Change Board vote deferral.

A Large Supplier queried whether following the workshop that Network Parties were happy with the outcome and that the feeling towards MP289 was positive. The SEC Change team confirmed this was the case, furthered by input of the DCC/Proposer. The Change Board chair asked the Change Board members representing Network Parties for their input. Network Party members in attendance confirmed they had no further issues with MP289 and were happy to proceed to vote.