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MP289 'BCDR Engagement'

Modification Report

Version 0.3

30 July 2025

Corporate member of
Plain English Campaign
Committed to clearer
communication

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About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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This document also has two annexes:

- **Annex A** contains the redlined changes to the SEC required to deliver the Proposed Solution.
- **Annex B** contains the DCC BCDR Testing Approach document.

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1. Summary

This proposal has been raised by David Rollason from the Data Communications Company (DCC).

In order to ensure that DCC services remain resilient, and to mitigate against unforeseen outages, the DCC conducts Business Continuity and Disaster Recovery (BCDR) Testing. The Smart Energy Code (SEC) sets out requirements regarding DCC's engagement with SEC Parties ahead of BCDR Testing activities taking place. The DCC's approach to BCDR Testing has evolved over time and the Proposer feels the current SEC engagement requirements may no longer be fit for purpose.

The Proposer would like to amend the current requirements for engagement and notification regarding BCDR Testing (considering the DCCs change of approach to testing) and formalise the production and availability of the DCC's [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 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 DCC's approach to BCDR testing has evolved since SECMP0029 was first implemented. As a result, the current SEC Party engagement requirements may not be appropriate in every instance of BCDR testing.

Some testing does not impact DCC Users or service availability for example, desk-based exercises (for example discussion-based, scenario and/or simulation testing etc) and 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. The Proposer believes that having different engagement requirements across different activities causes more complexity for the DCC and Users.

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 which can increase the likelihood of amendments needing to be made and further engagement being required. 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.

What is the impact this is having?

The combination of different engagement requirements across different outage activities and the need for advanced planning can make it difficult to engage Parties in an efficient and joined up manner. Not having a joined-up approach to testing and outages potentially makes it difficult to provide a coherent narrative and can result in confusing engagement.

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 will 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 notifies Parties ahead of any BCDR testing that is expected to impact the provision of DCC Services. For the avoidance of doubt, the DCC are not seeking to amend the current notification and engagement period of 60 Working Days.

The proposer is also looking to introduce requirements on the DCC to formalise the production and availability of the DCC's 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.

4. 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 documented its approach to BCDR Testing. The DCC published its draft BCDR Test Approach document alongside its [consultation on the April 2025 – March 2026 Testing Schedule](#).

The document provided 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 DCC's [Conclusion on the April 2025 – March 2026 BCDR Test Schedule](#) document. The DCC updated the approach document following receipt of responses. The most recent version of this document is v0.5.

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

The DCC's approach to BCDR testing has evolved since SECMP0029 was first implemented. As a result, the requirement to consult and provide 60 Working Days' notice of testing to SEC Parties may not be appropriate in every instance of BCDR testing. For example, some testing does not impact DCC Users or Service availability, and some testing is completed as part of Planned Maintenance which has different engagement timescales.

The Proposer believes that having different requirements for engaging with SEC Parties and providing notifications across different activities causes more complexity for the DCC and Users.

In an effort to complete engagement and notification activities efficiently, the DCC consults and notifies for a full calendar year of BCDR testing activities. Therefore, the planning for BCDR testing activities starts many months in advance. However, this can increase the likelihood of amendments needing to be made.

Sub-Committee input

SECAS will engage 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 believes the following Sub-Committees will need to provide the following input to this modification:

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

Observations from Sub-Committees

Discussions at CSC

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

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.

Discussions at TAG

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.

Discussions at TABASC

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.

Discussions at Working Group

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.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Presented to Issued Group	5 March 2025
Draft Proposal raised	8 April 2025
Presented to CSC for initial comment	15 April 2025
Modification discussed with OPSG	28 April 2025
Modification discussed with TAG	28 May 2025
Modification discussed with the Working Group	4 June 2025
Modification discussed with TABASC	5 June 2025
<i>Modification discussed with the Working Group</i>	<i>6 August 2025</i>

Managed by

Timetable	
Event/Action	Date
<i>Modification discussed with TABASC</i>	4 September 2025

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
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Advisory Group