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MP289 'BCDR Engagement'

Modification Report

Version 0.2

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Corporate member of
Plain English Campaign
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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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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 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. 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 its draft [BCDR Test Approach document](#) alongside its consultation on the April 2025 – March 2026 Testing Schedule.

The document provides Parties with additional insight into the DCC's approach to proving resilience and conducting BCDR Tests. The DCC's consultation on this approach document took place during December 2024 and January 2025. As part of this consultation the DCC asked Parties to review the draft document and provide comments on its content, including the approach to testing and the sections included within the document.

The DCC received three responses to this consultation, which will be shared and considered as part of this Modifications development.

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 (SMIKI 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
SMIKI PMA	No input required
TAG	No input required

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.

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
<i>Modification discussed with TAG</i>	<i>28 May 2025</i>
<i>Modification discussed with the Working Group</i>	<i>4 June 2025</i>
<i>Modification discussed with TABASC</i>	<i>5 June 2025</i>

Italics denote planned events that could be subject to change

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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
SMIKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Advisory Group