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Action:	For Information

MP289 – BCDR Engagement

1. Purpose

The purpose of this paper is to gather views on the changes proposed as part of [MP289 'BCDR Engagement'](#).

This section summarises the key points of this Modification Proposal. More information is available in the Modification Report in Appendix A.

1.1 What are the current arrangements?

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.

1.2 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.

1.3 What impact is this 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.

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.

2. Proposed Solution

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.

3. Questions for TABASC

We are seeking the TABASC's input on the following questions:

- Does the TABASC see any issues arising from the implementation of this Modification?
- Is the TABASC aware of any specific requirements required for this Modification?

4. Recommendations

The TABASC is requested to:

- **NOTE** the contents of this paper; and
- **PROVIDE** feedback on the proposed changes.

Talia Lattimore

SECAS Team

28th May 2025

Attachments:

Appendix A: MP289 Modification Report v0.2