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Paper Reference:	TABASC_119_0611_10
Action:	For Discussion

MP289 – BCDR Engagement

1. Purpose

The purpose of this paper is to gather views on the draft legal text and the draft BCDR Testing Approach document for [MP289 'BCDR Engagement'](#).

This section summarises the key points of this Modification Proposal. More information is available in the draft legal text in Appendix A and the BCDR Testing Approach Document in Appendix B

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 implemented. As a result, the DCC feels that the current SEC Party engagement requirements may not be 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 that 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 in alignment with the notice period.

Another issue identified by the Proposer is 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.

1.3 What impact is this 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.

SEC Parties currently have no formal visibility over how the DCC approaches its BCDR Tests. This means Parties may have little insight into the benefits of testing and why its conducted.

2. 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.

For the avoidance of doubt, the DCC is not seeking to review or amend the current approach to BCDR testing as part of this Modification and are only seeking to make available more details information about the approach.

3. Next Steps

SECAS are presenting the draft legal text and draft BCDR Testing Approach Document to interested committees during November/December 2025 before issuing the Modification for Report Consultation.

4. Questions for TABASC

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

- Does the TABASC have any comments on the draft legal text or the content of the draft BCDR Testing Approach document?
- Does the TABASC have any views on the next steps?
- Does the TABASC have any other comments or questions?

5. Recommendations

The TABASC is requested to:

- **NOTE** the contents of this paper; and
- **PROVIDE** feedback on the draft legal text and content of the draft BCDR Testing Approach Document.

Talia Lattimore

SECAS Team

30th October 2025

Attachments:

Appendix A: MP289 Draft Legal Text v0.1

Appendix B: Draft BCDR Approach Document v0.5