SEC
Smart Energy Code

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Action:	**For Information**

Business Continuity Disaster Recovery - Operations Group views

1. Purpose

This paper provides the SEC Panel with views from the Operations Sub Group (Ops Group) in relation to the DCC Business Continuity Disaster Recovery (BCDR) re-test proposals. The Panel are requested to note the views of the Ops Group that the retest of the BCDR should be conducted during May 2019.

2. Background

At OPSG_19_0204, the DCC updated the Ops Group with details of the recent BCDR tests conducted throughout March 2019. The tests have been partially successful, with issues encountered for the Data Service Provider (DSP) and Communication Service Provider Central and South (CSPC&S). The DSP failover to its secondary site was not carried out successfully: it was discovered that the secondary site was not synchronised with the primary site. The CSPC&S did not manage to fail back to its primary site.

The DCC strongly recommended to the Ops Group that a further BCDR test should be undertaken as soon as possible to successfully complete the tests planned in March 2019. It is the DCC view that until the tests are complete, the resilience of the production service is at risk.

The DCC has also confirmed that it now believes it to be highly preferable to conduct a further BCDR test once the SMETS1 migration has commenced. The rationale for the additional test is that the operational environment is materially different to that it has tested to date. The Ops Group had previously raised this point in its response to the DCC consultation for its planned BCDR tests dated 30 November 2018.

3. SEC requirements

The SEC requirements for the BCDR tests clearly state that the DCC should provide 60 Working Days' notice to Parties prior to undertaking BCDR tests. The DCC consulted and provided notice to Parties of the planned BCDR tests on 11 December 2018.

The Ops Group discussed whether the failure of the test and the proposed re plan should require a further notification. The SEC is not definitive that a failure of a test and re test should be re notified. SEC Clause H10.12B requires that the DCC provide such notice as is reasonably practicable where an amendment to a previously notified BCDR test is required.

The Ops Group also discussed whether the re-test should be categorised as planned or unplanned maintenance. The SEC does not stipulate how BCDR tests should be categorised. However, as the tests have not been successful, it would seem reasonable for the service outages incurred to be reflected in the overall service availability measures for the period in which these are incurred.

4. Request for Re test from the DCC

The DCC sought the views of the Ops Group about when they should conduct the BCDR re-tests.

In consideration of the request, the Ops Group were firmly of the view that any re-testing should be conducted on Sundays only, in order to limit impacts to the smart meter rollout.

Noting the concerns expressed by the DCC and their preference to carry out the re-test as soon as practicable, the Ops Group considered the practicalities of how quickly a re-test could take place. The majority of Ops Group Members were in favour of the test taking place in May 2019. One Party has specifically requested that Sunday, 12 May 2019 is avoided as they are undergoing internal changes. One Party requested for the tests to be undertaken in June 2019.

Extracts of the relevant SEC clauses pertaining to BCDR tests are annexed to this paper.

The Ops Group also expressed frustration at the standard of communications provided by the DCC during the BCDR tests. The DCC accepted these should have been better and are reviewing their approach.

5. Recommendations

The Panel is requested to:

- **NOTE** the content of this paper and the views of the Ops Group that the retest of the BCDR be conducted during May 2019.

Tim Newton

SECAS Team

5 April 2019

Attachments:

- Appendix A: DCC Business Continuity Disaster Recover report (**GREEN**) *(late paper)*

Annex 1 SEC Clauses pertaining to BCDR tests

H10.11 *The DCC shall (subject to any contrary provisions in the SEC Subsidiary Documents applying in relation to the SMETS1 SM WAN and/or the Systems of the SMETS1 Service Providers):*

(a) from time to time, and at least once each year, carry out a Business Continuity and Disaster Recovery Test in order to assess whether the Business Continuity and Disaster Recovery Procedure remains suitable for achieving the objectives described at Section H10.9; and

(b) following any such test, report to the Panel and the Authority on the outcome of the test, and on any proposals made by the DCC in relation to the Business Continuity and Disaster Recovery Procedure having regard to that outcome.

H10.12 Each Party shall provide the DCC with any such assistance and co-operation as it may reasonably request for the purpose of carrying out a Business Continuity and Disaster Recovery Test and confirming the operation of the Business Continuity and Disaster Recovery Procedure.

H10.12A Before notifying the Parties of each Business Continuity and Disaster Recovery Test, the DCC shall consult with the Parties and the Technical Architecture and Business Architecture Sub-Committee regarding the Business Continuity and Disaster Recovery Test Schedule to ensure that (insofar as is reasonably practicable) the Business Continuity and Disaster Recovery Test is undertaken in such a way as to minimise any disruption to the provision of the Services (or any part of them). The DCC shall complete all necessary consultation prior to notifying Parties.

H10.12B The DCC shall notify each Party of its intention to carry out a Business Continuity and Disaster Recovery Test and provide each Party with a Business Continuity and Disaster Recovery Test Schedule at least 60 Working Days before the date on which such test is due to start. Where the DCC needs to amend the Business Continuity and Disaster Recovery Test Schedule following such notification and it is not reasonably practicable to give 60 Working Days' notice, it will provide such notice as far in advance as is reasonably practicable.