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SECMP0029 Draft Modification Report

About this document

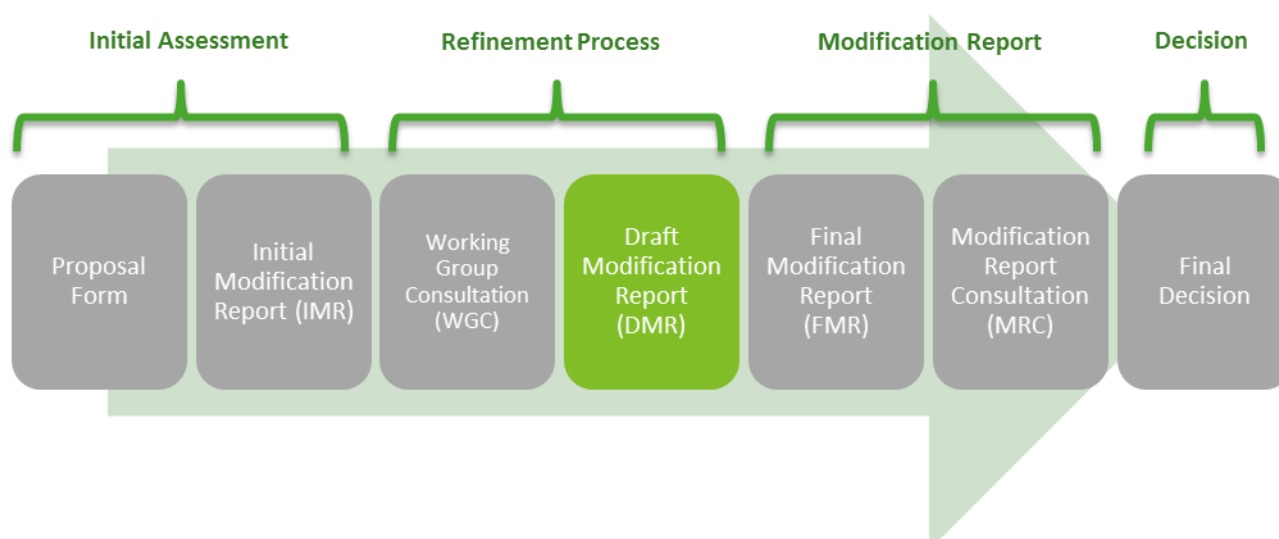
This Draft Modification Report provides detailed information on the issue, solution, impacts, costs and Working Group discussions and conclusion on SECMP0029.

This report is submitted to the Panel to confirm that due process has been followed and to determine whether or not the Modification Report proceed to the Modification Report Consultation.

As part of this document the Panel is invited to:

- **AGREE** that SECMP0029 is a Path 3 Modification Proposal;
- **AGREE** that the draft legal text delivers the intention of the modification;
- **AGREE** with the proposed implementation date **28th June 2018**, with a fall-back date of 1st November 2018; and
- **AGREE** that this modification be submitted to Modification Report Consultation.

Where are we in the process?



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Stage 02: Draft Modification Report

SECMP0029:

Business Continuity and Disaster Recovery Testing Amendments

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
04	Decision

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Summary

This Modification Proposal seeks to amend the Data and Communications Company's (DCC) obligations in relation to Business Continuity and Disaster Recovery (BCDR) testing in order to reduce customer impacts and introduce provisions to minimise disruption to SEC Parties during BCDR testing.

Working Group View



- The Working Group (WG) **unanimously** believes that SECMP0029 should be **approved**.

Impacts



- The DCC
- There are no impacts on any other SEC Parties, DCC Central Systems and/or Party interfacing systems.

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About this Document

This document is a Draft Modification Report (DMR). It provides detailed information on the issue, solution, impacts, costs and WG discussions and conclusions on SECMP0029.

This document has two attachments:

- Attachment A contains the draft legal text changes to support this modification; and
- Attachment B contains the full responses to the Working Group Consultation (WGC).

The Smart Energy Code (SEC) Panel will consider this report at its meeting on 9th March 2018 to ensure that due process has been followed and determine whether to issue the modification for Modification Report Consultation (MRC).

1. Summary

What is the issue?

Currently, SEC Section H 'DCC Services' does not include any provision for the DCC to either consult with or notify SEC Parties prior to BCDR testing. SEC Parties not being informed well ahead of planned BCDR testing may result in customer driven SRs being lost. Furthermore, any loss of SRs could impact the customer's experience and potentially result in unintended disconnection of supply.

What is the Proposed Solution?

This Modification Proposal seeks to amend the DCC's obligations in relation to BCDR testing in order to reduce customer impacts and introduce provisions to minimise disruption to SEC Parties during BCDR testing.

Impacts – Proposed Solution

Party

The implementation of this modification will impact the **DCC**. There are no impacts on any other SEC Parties anticipated.

System

This modification will not impact DCC Central Systems or Party interfacing systems.

Implementation Costs

The total estimated implementation cost to deliver SECMP0029 is approximately £1,200. This total cost consists of:

- **£1,200** in SEC Administration effort.

Implementation Date

The WG recommends an implementation date for SECMP0029 of:

- **28th June 2018**, if a decision to approve is made by 11th June 2018; or
- **1st November 2018**, if a decision to approve is made after 11th June but by 15th October 2018.

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Working Group's views

The WG **unanimously** believes that SECMP0029 better facilitates the SEC Objectives (a) and (c). The WG therefore believe that this Modification Proposal should be **approved**.

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2. What is the issue?

Background

The DCC is required to perform BCDR testing on its systems at least once a year. The following systems will be tested as part of this:

- One Data Service Provider (DSP);
- Two Communication Service Providers (CSPs); and
- The Smart Metering Key Infrastructure (SMKI).

BCDR testing of the above systems may take place at the same time or separately.

SEC Section H 'Business Continuity and Disaster Recovery Procedure' 10.9 sets out the requirements that the DCC must comply with. Compliance with this procedure ensures that there is no significant disruption to the provision of any of the Services provided by the DCC. Where there is any significant disruption, the provision of those Services is restored as soon as is reasonably practicable.

What is the issue?

Currently, SEC Section H does not include any provision for the DCC to either consult with or notify SEC Parties prior to BCDR testing. SEC Parties not being informed well ahead of planned BCDR testing may result in customer driven SRs being lost. Any loss of SRs could impact the customer's experience and potentially result in unintended disconnection of supply.

3. Proposed Solution

Solution

The Proposer seeks to amend SEC Sections H10.11 and H10.12 to limit the disruption to SEC Parties and consumers during BCDR testing. This will be done by introducing the following DCC requirements into the SEC:

- The DCC will consult with SEC Parties and with the Technical Architecture and Business Architecture Sub-Committee (TABASC) prior to BCDR testing, regarding the BCDR Test procedure.
 - This consultation will take place prior to the DCC notifying SEC Parties ahead of a test event.
- The DCC will then notify each SEC Party 60 Working Days (WDs) prior to the date on which a BCDR Test is due to take place.

Draft legal text

The proposed legal text changes to SEC Sections A 'Definitions and Interpretation' and H are provided in Attachment A.

4. Impacts

The following section sets out the impacts associated with the implementation of SECMP0029.

SEC Party impacts

The **DCC** will be impacted by this modification as (if implemented) it will require the DCC to:

- consult with SEC Parties and the TABASC on BCDR testing; and
- notify SEC Parties 60 WDs prior to a BCDR test.

Both activities will require additional time and effort from the DCC.

This modification will positively impact **SEC Parties** as it will provide them with enough time to prepare for BCDR testing and to inform their customers. In addition to this, by introducing a consultation prior to BCDR testing, SEC Parties will be able to advise the DCC of any date/time ranges where a test is not desirable for them.

There have been no direct implementation impacts on any other SEC Parties identified.

Central System impacts

This modification will not impact DCC Central Systems or Party interfacing systems.

Testing

Testing is not required for the implementation of this Modification Proposal.

SEC and Subsidiary Document impacts

SEC Sections A and H will be impacted by this Modification Proposal.

Impacts on other industry codes

No impacts on any other industry codes have been identified.

Greenhouse Gas Emission impacts

No impacts on Greenhouse Gas Emissions have been identified.

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5. Costs

Estimated Implementation costs

The total estimated implementation cost to delivery SECMP0029 is approximately £1,200.

SEC costs

The estimated SEC implementation cost is detailed in the table below:

SECAS implementation costs		
Implementation Activity	Effort (man days)	Cost
Application of approved changes to the SEC. Publication of new version of the SEC on the SEC Website and issuance to SEC Parties. Review and updated any impacted SEC guidance materials.	Two	£1,200 ¹

6. Implementation

Recommended implementation date

SECAS and the WG recommends the following implementation date for SECMP0029:

- **28th June 2018**, if a decision to approve is made by 11th June 2018; or
- **1st November 2018**, if a decision to approve is made after 11th June, but by 15th October 2018.

¹ SEC man day effort based on a blended rate of £600 per day.

7. Working Group's Discussions

The WG's **unanimous** view is that SECMP0029 better facilitates General SEC Objectives (a) and (c) and should be **approved**.

Discussions of current arrangements

Prior to discussions on the issue outlined and the proposed solution, the WG requested the DCC to inform it of how its internal procedures work during BCDR tests, and how the test is carried out in detail.

The DCC noted that (under current arrangements) it is required to perform BCDR testing on its systems at least once a year. SEC Parties will be notified in advance of planned BCDR testing and gateway closure. Once the gateway is closed, all incoming SRs will be rejected and SEC Parties will be notified of the reason for rejection. Any SRs that enter the gateway prior to its closure will be processed as usual.

The DCC advised the WG that four systems will be tested as part of BCDR:

- One DSP's system;
- Two CSP's systems; and
- The SMKI systems.

In total, there will be eight tests, consisting of failover and failback testing, in relation to each system. Each failover or failback test noted below requires four hours outage time:

- DSP failover from production to Disaster Recovery (DR);
DSP failback from DR to production;
- Each CSP failback from DR to production;
- SMKI failover from production to DR; and
SMKI failback from DR to production.

The total outage time for a BCDR test could be any duration between four hours (in the case of only one failover or failback test being performed) to 32 hours (if all possible failovers and failbacks are carried out and are done so in succession, though this would be reduced if tests were carried out in parallel, e.g. performing the failover tests for multiple systems at the same time). These timeframes are based on the assumption that no issues will be encountered as part of the testing.

The DCC noted that BCDR tests are likely to be held on a Friday evening between 8pm-12am.

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Solution options considered by the WG

When SECMP0029 was first raised, the original solution proposed to add new clauses to SEC Section H10.11. These clauses would have required the DCC to retain any SRs received during BCDR testing and to process them appropriately following completion of the testing, in order to:

- cause as minimal disruption to Services as practicable when testing the operation of its Business Continuity and Disaster Recovery arrangements; and
- queue any Service Requests received during the Business Continuity and Disaster Recovery arrangements test which cannot be processed on demand, and process those queued Service Requests as soon as practicable.

The WG considered the current arrangements and the original proposed solution, and determined that a second solution option could be taken forward as follows:

1. A requirement would be introduced to ensure that the DCC gives reasonable notice to SEC Parties in advance of BCDR testing, and to keep the disruption to a minimum; and
2. A requirement on the DCC to queue SRs during BCDR.

These options were discounted as the DCC approach to BCDR testing is to shut down the Gateway Connection, which will prevent SEC Parties from sending any SRs during this time.

A third solution was also considered, which would involve building a new DSP system. Following discussions, the WG agreed that this option would be very costly to adopt, and so this option was discounted.

Following further discussions, the Proposer and the WG agreed that the more pragmatic approach was to focus on introducing obligations under the SEC rather than trying to change the system. The WG therefore agreed the following as part of the current proposed solution:

- The DCC's notification time of planned BCDR tests would be extended from the current 20 WDs to 60 WDs; and
- The DCC would be required to consult with Parties and with the TABASC prior to notifying them of a BCDR test.

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BCDR outage time

Some WG members expressed concern about how BCDR testing will be carried out, and the amount of outage time that may be associated with it. They noted a WGC response where the respondent highlighted that DCC systems will typically be taken down from 20:00 – 24:00 during a test. The respondent believed that having a start time of 20:00 may cause problems with the sending of Registration Data Provider (RDP) files. The respondent noted that having a later start time will mitigate this problem.

The DCC advised the WG that it intends to raise a separate modification in the future to introduce more of the detail around BCDR testing and how future BCDR tests will be carried out on an enduring basis.

Consideration of Path Type

The WG considered whether this modification should still progress as a Path 2 'Authority Determined' Modification Proposal, or if the Panel should consider progressing this modification as a Path 3 'Self Governance' Modification Proposal. It agreed that this modification should be progressed as a Path 3 'Self Governance' Modification Proposal, as the material impact originally envisioned under the initially proposed solution is no longer relevant. The WG therefore agreed to recommend to the Panel the Path be changed at its meeting on 9th March 2018.

8. Working Group's Conclusions

The WG's **majority** view is that SECMP0029 better facilitates General SEC Objectives (a) and (c) and should be **approved**.

Benefits and drawbacks of SECMP0029

The Proposer and the WG have identified the following benefits and drawbacks related to SECMP0029:

Benefits

The WG agreed that, if implemented, the proposed solution and legal text will enable Users a reasonable amount of time in which to inform their customers (of any BCDR related outage). Also, SECMP0029 will allow Suppliers more time to be able to prepare for the outages and manage them more efficiently during BDCR testing. Hence, if implemented, this modification will positively impact both Suppliers and Consumers.

The majority of the Parties that responded to the WGC stated that the implementation of this modification will have a positive impact on their organisation. Those who provided rationale gave the following reasons:

- 60 WDs notice of any BCDR Test activity will enable Suppliers' to plan accordingly and issue communications in a timely manner;
- The increased notice period will support Suppliers' forward planning for system downtime and help manage the customer impacts; and
- This change will protect customers as it simplifies the process and reduces the risk of negative outcomes.

Further, the DCC noted that it intends to raise a modification to codify more of the detail around how future BCDR tests (from 2018 onwards) will be carried out on an enduring basis. If implemented, SECMP0029 will support the intended future modification proposal.

Drawbacks

No drawbacks have been identified in relation to this Modification Proposal.

The WG stated its concerns about the BCDR testing procedure as a whole. However, SECAS informed the WG that the BCDR testing procedure is not within the scope of this Modification Proposal but is something that should be clarified and informed by the DCC separately.

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Views against the General SEC Objectives

Objective (a)

The **majority** of the WG believes that this modification will better facilitate SEC Objective (a) as it will provide more notice to Suppliers of BCDR testing, which in turn will allow them to warn customers of an upcoming outage within a reasonable amount of time.

One WG member believes that this modification is neutral against SEC Objective (a).

Objective (c)

The WG **unanimously** believes that this modification will better facilitate SEC Objective (c) by allowing Suppliers to be able to prepare for the outages and manage efficiently.

For the avoidance of doubt, the WG believes that SECMP0029 is neutral against all other SEC Objectives.

Draft legal text changes

The WG agreed that the proposed legal text (Attachment A) for SECMP0029 delivers the intention of the Modification Proposal.

Implementation approach

The WG proposes the following proposed implementation date for SECMP0029:

- **28th June 2018**, if a decision to approve is made by 11th June 2018; or
- **1st November 2018**, if a decision to approve is made after 11th June but by 15th October 2018.

9. Recommendations

The Panel is invited to:

- **AGREE** that SECMP0029 is a Path 3 Modification Proposal;
- **AGREE** that the draft legal text delivers the intention of the modification;
- **AGREE** that the modification proceeds to Modification Report Consultation; and
- **AGREE** with the proposed implementation date of 28th June 2018, if a decision to approve is made by 11th June 2018; or 1st November 2018, if a decision to approve is made after 11th June, but by 15th October 2018.

Appendix 1: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Term
BCDR	Business Continuity and Disaster Recovery
CSP	Communication Service Provider
DCC	Data and Communications Company
DMR	Draft Modification Report
DSP	Data Service Provider
IA	Impact Assessment
MRC	Modification Report Consultation
PA	Preliminary Assessment
RDP	Registration Data Provider
SEC	Smart Energy Code
SMKI	Smart Metering Key Infrastructure
SR	Service Request
WD	Working Day
WG	Working Group
WGC	Working Group Consultation