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SECMP0029 Draft Modification Report

About this document

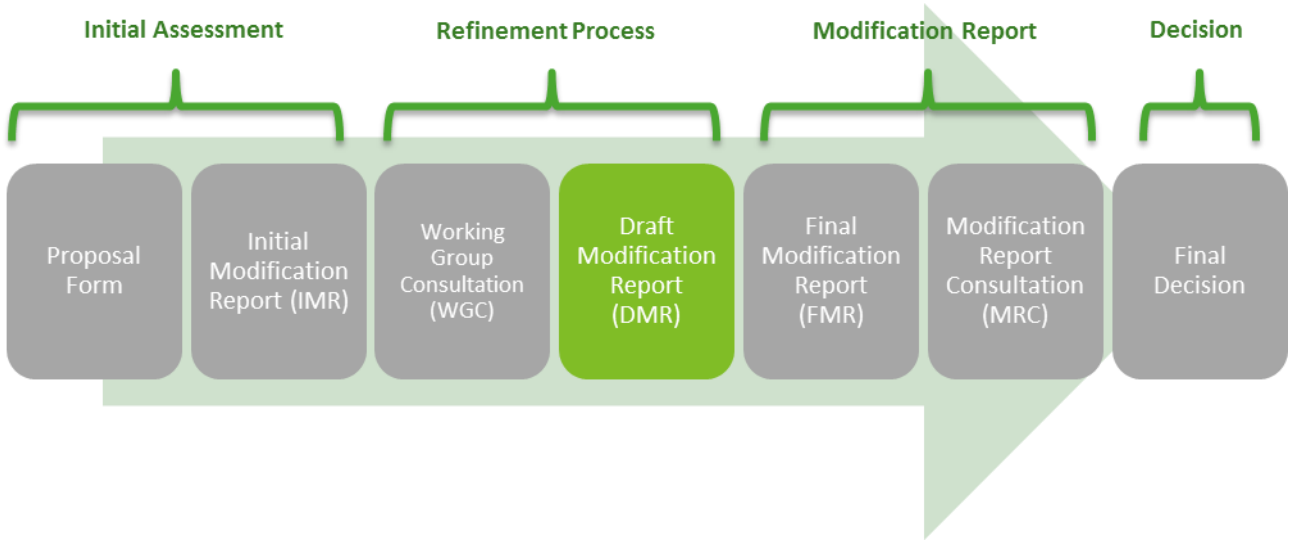
This Draft Modification Report (DMR) provides detailed information on the issue, solution(s), impacts, costs and Working Group discussions and conclusion on SECMP0029 'Business Continuity and Disaster Recovery Testing Amendments'.

This report is submitted to the Smart Energy Code (SEC) Panel for consideration to ensure that due process has been followed and determine whether to issue the modification for Modification Report Consultation (MRC)

As part of this document the Panel will be invited to:

- **AGREE** that SECMP0029 is a Path 3 Modification Proposal;
- **AGREE** that the revised legal text delivers the intention of the modification;
- **AGREE** with the revised recommended implementation approach; and
- **AGREE** that this modification be submitted to a second Modification Report Consultation.

Where are we in the process?



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Stage 02: Draft Modification Report

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
► 04	Decision

SECMP0029:

Business Continuity and Disaster Recovery Testing Amendments

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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 unanimously believes that SECMP0029 should be approved

Impacts

!

- DCC; and
- DCC Users.
- There are no impacts on DCC Central Systems or Party interfacing systems.

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About this Document

This document is a Draft Modification Report (DMR). This document provides detailed information on the issue, solution(s), impacts, costs and Working Group discussions and conclusion on SECMP0029.

This document has three attachments:

- Attachment A contains the updated legal text changes to support this modification;
- Attachment B contains responses to the Working Group Consultation (WGC); and
- Attachment C contains responses to the first Modification Report Consultation (MRC).

The Smart Energy Code (SEC) Panel will consider this updated report at its meeting on 13th July 2018 to ensure that due process has been followed and determine whether to issue the modification for a second MRC.

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1. Summary

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 Service Requests being lost. Any loss of Service Requests could impact the customers' 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

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 in SEC Administration effort.

Implementation Date

The Working Group recommends a revised implementation date of:

- **1st November 2018**, if a decision to approved is made on or before 15th October 2018; or
- **28th February 2019** if a decision to approve is made after 15th October 2018 but on or before 14th February 2019.

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Working Group's views

The Working Group believes that SECMP0029 better facilitates SEC Objectives (a) and (c). It therefore believes that this Modification Proposal should be **approved**.

Panel and Change Board's previous views

The Panel **unanimously** agreed that due process has been followed and that SECMP0029 should progress to MRC.

Following MRC, the Change Board identified that the legal text did not fully and unambiguously deliver the intention of SECMP0029, and voted to return the Modification Report to the Panel. The Panel agreed that further work was required on the legal text, and returned SECMP0029 to the Working Group.

This updated copy of the Modification Report provides the updated legal text as agreed by the Working Group.

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2. What is the issue?

Background

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 H10.9 'Business Continuity and Disaster Recovery Procedure' 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 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 Service Requests could impact the customers' experience and potentially result in unintended disconnection of supply.

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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:

- 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 DCC notifying SEC Parties ahead of a test event.
- DCC will then notify each SEC Party 60 Working Days 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 'DCC Services' are provided in **Attachment A**.

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4. Impacts

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

SEC Party impacts

DCC will be impacted by this modification as it will require it to:

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

Both activities will require additional time and effort from 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.

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.

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 issuing this to SEC Parties. Review and updated any impacted SEC guidance materials.	Two	£1,200[1]

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

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6. Implementation

Recommended implementation date

The Working Group recommends a revised implementation date of:

- **1st November 2018**, if a decision to approved is made on or before 15th October 2018; or
- **28th February 2019** if a decision to approve is made after 15th October 2018 but on or before 14th February 2019.

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7. Working Group Discussions

Discussions of current arrangements

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

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 Service Requests will be rejected, and SEC Parties will be notified of the reason for rejection. Any Service Requests that enter the gateway prior to its closure will be processed as usual.

DCC advised the Working Group that four systems will be tested as part of BCDR:

- One Data Service Provider's (DSP) system;
- Two Communication Service Provider (CSP) systems; and
- The Smart Meter Key Infrastructure (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.

DCC noted that BCDR tests are likely to be held on a Friday evening between 20:00-24:00.

Solution options considered by the Working Group

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

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- 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 Working Group 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 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 DCC to queue Service Requests 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 Service Requests during this time.

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

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

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

BCDR outage time

Some Working Group 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.

DCC advised the Working Group 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.

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Consideration of Path Type

The Working Group 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 Working Group therefore agreed to recommend to the Panel the Path be changed at its meeting on 9th March 2018. The Panel agreed with this recommendation.

Comments on the legal text

Comments were raised on the proposed legal text during the MRC that were considered by the Change Board on 18th April 2018:

- It was believed the original proposed wording in new Section H10.12A could be implied that the consultation does not need to have been completed before the notification is issued.
- It was believed that the last part of new Section H10.12B, reading "(or, where it is not reasonably practicable to give 60 Working Days' advance notice, as far in advance as is reasonably practicable)" should be removed as there is no reason why 60 Working Days' notice cannot be provided by DCC. It was clarified at the Change Board that it was the intent of SECMP0029 that the original BCDR notification would be given at least 60 Working Days before the event; the intent of this bracket was to cover any rescheduling that may be required after the original BCDR test plan had been approved. For example, it may be identified that an additional weekend of outage is needed due to issues with the tests. In this scenario, Suppliers would have less than 60 Working Days' notice of this change of plans.

The Panel agreed to send the Modification Report back to the Working Group on 11th May 2018 in order to review the legal text.

SECAS and the Working Group have reviewed the legal text and agreed amended wording for both of these sections. These can be found in Attachment A. The originator of the MRC comments was included in this review of the revised wording, and provided no objections.

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8. Working Group's Conclusions

The Working Group's **unanimous** 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 Working Group have identified the following benefits and drawbacks related to SECMP0029:

Benefits

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

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Draft legal text changes

The Working Group has agreed that the revised legal text for SECMP0029 delivers the intention of the Modification Proposal.

Views against the General SEC Objectives

Objective (a)[2]

The **majority** of the Working Group believe 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 Working Group member believes that this modification is neutral against SEC Objective (a).

Objective (c)[3]

The Working Group **unanimously** believe 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 Working Group believes that SECMP0029 is neutral against all other SEC Objectives.

[2] Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.
[3] Facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.

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9. Recommendations

The Panel is invited to:

- **AGREE** that SECMP0029 is a Path 3 Modification Proposal;
- **AGREE** that the revised legal text delivers the intention of the modification;
- **AGREE** with the revised recommended implementation approach; and
- **AGREE** that this modification be submitted to a second Modification Report Consultation.

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Appendix 1: Glossary

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

Acronym	Definition
BCDR	Business Continuity and Disaster Recovery
CSP	Communication Service Provider
DCC	Data and Communications Company
DSP	Data Service Provider
FMR	Final Modification Report
MRC	Modification Report Consultation
RDP	Registration Data Provider
SMKI	Smart Metering Key Infrastructure
TABASC	Technical Architecture and Business Architecture Sub-Committee
WGC	Working Group Consultation

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