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Modification Decision

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 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.

Change Board Decision



- The Change Board believes that SECMP0029 does better facilitate the SEC Objectives, and so has approved SECMP0029 under Self-Governance.

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About this Document

This is the Modification Decision document for SECMP0029. This document provides a summary of the Change Board's discussions and final determination on this modification under Self-Governance.

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1. Initial Change Board discussions

The Change Board initially considered SECMP0029 at its meeting on 18th April 2018. At this meeting the Change Board agreed to send this modification back to the Panel for further consideration, in order to clarify queries relating to the legal text.

Changes to the legal text

The Change Board discussed the legal text drafting provided with the Final Modification Report (FMR) at this time and highlighted a number of amendments that they believed needed to be made. This discussion was guided by one of the responses received to the first Modification Report Consultation (MRC).

The members discussed whether the title of SEC Section H10.11 should be read as 'test' as opposed to 'tests'. The DCC Representative noted that the reason it is 'tests' is there are a number of steps or tests within a given BCDR testing procedure, and some of those tests are carried out on different dates.

Members noted that the consultation on the BCDR testing referenced in proposed SEC Section H10.12A should be completed prior to the notification being issued. If the consultation does not close, and the responses, decisions and other related documentation are not provided to Parties prior to the notification, there would be little point in the consultation. Members considered that this was the intent of the legal text but believed that it was not fully clear, and that clarification should be made to ensure this was not misinterpreted in the future. SECAS confirmed that this would constitute a minor and non-material clarification change and so could be made at this late stage of the Modification Process.

Finally, the Change Board noted the following term in proposed SEC Section H10.12B: "(or, where it is not reasonably practicable to give 60 Working Days' advance notice, as far in advance as is reasonably practicable)". It was discussed whether this clause should be removed, as there is no reason why 60 Working Days' notice cannot be provided by DCC.

One member, who had been on the Working Group, highlighted that this clause had been introduced to cover any rescheduling that may be required after the original BCDR test plan had been approved. They noted the example that, during testing, 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. It was always the intent that the original notification would be given at least 60 Working Days before the event.

A member raised the question that Suppliers may potentially have to reset their consumers' expectations of an outage, especially prepayment customers, due to changes in the plan. It is therefore sensible to have this as a codified or defined parameter. This point was raised because the current drafting could be interpreted as saying Parties may not have 60

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Working Days' notice; it does not mention that this point was introduced specifically in relation to rescheduling once the original plan has been notified. It also does not state how much time the Suppliers may have to give to their consumers if the testing is delayed and rescheduled.

It was felt that making such changes to the legal text at this stage would constitute a material change. The Change Board therefore agreed to send this back to the Panel, recommending that the legal text be discussed further and amended by the Working Group. Members requested that the Working Group should ensure that the legal text clearly delivers the intent of the solution with no ambiguity. The Proposer Party's representative agreed it would be beneficial to take this approach. The Change Board also sought for the Working Group to discuss this and finalise the points as soon as possible, to prevent this modification from being delayed any further.

Discussion on the modification

One member considered that the solution agreed by the Working Group did not appear to meet the original intention of this modification. The issue identified within the Modification Proposal was around the loss of Service Requests, and this modification currently does not deliver a solution for that issue. Instead, this modification requests that Suppliers do not send consumer-driven Service Requests during a BCDR test, which does not provide any level of protection. Also, in a scenario where Ofgem's automated switching program is implemented, since such Service Requests would be automated, Suppliers will not have any visibility of these being sent, and these would not be cached; hence Suppliers will have no control over them. Therefore, considering these points, the member stated that they are not sure if the current solution is a solution to the actual problem identified.

The Proposer Party's representative believed that this modification, as it stands, will help Parties and DCC through the BCDR testing process, and fill the gap that currently exists, and therefore believes that this modification should be progressed to a decision as soon as possible. They noted that this area had been discussed by the Working Group in conjunction with DCC, and it had been agreed that this was the most effective solution that could be implemented at this time. As Proposer, they were content with the solution developed. No other Change Board members commented on this aspect.

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2. Subsequent Change Board discussions

The **unanimous** view of the Change Board is that SECMP0029 does facilitate General SEC Objectives (a) and (c) and should be **approved**.

Change Board discussions

The Change Board noted the changes to the legal text made in response to the previous discussion. Members had no further comments on the modification.

Views against the General SEC Objectives

Objective (a)¹

The **unanimous** view of the Change Board is that SECMP0029 would better facilitate 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.

Objective (c)²

The **majority** view of the Change Board is that SECMP0029 would better facilitate Objective (c) by allowing Suppliers to be able to prepare for the outages and manage these efficiently.

One Change Board members considered SECMP0029 to be neutral with respect to Objective (c).

For the avoidance of doubt, the Change Board believes that SECMP0029 is neutral against the remaining Objectives.

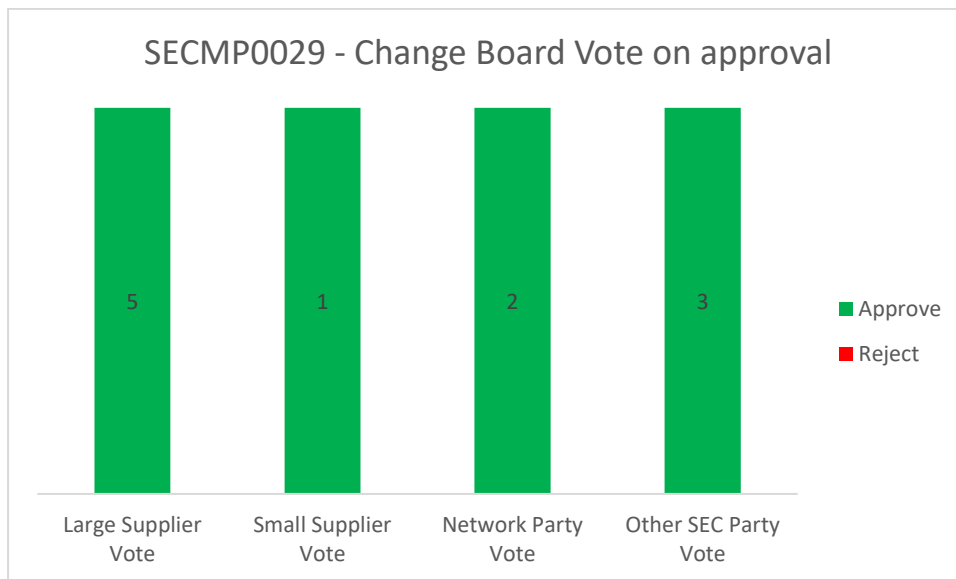
¹ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

² 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.

3. Change Board vote

This section sets out the breakdown of the Change Board's final vote.

The Change Board voted to approve SECMP0029.



One Network Party member abstained from the vote as they did not believe this change would impact on Gas Transporters.

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4. Change Board decision

The Change Board:

- **CONSIDERED** the Final Modification Report and Modification Report Consultation responses for SECMP0029;
- **APPROVED** SECMP0029 under Self-Governance for implementation on 1st November 2018; and
- **PROVIDED** rationale as to why SECMP0029 better facilitates the General SEC Objectives.

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