

DCC Consultation on BCDR Tests

April 2025 – March 2026
BCDR Test Schedule

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1. Executive Summary

1. Business Continuity Disaster Recovery (BCDR) Procedures help to ensure services can continue to be provided with as little disruption as possible for DCC customers and consumers in the event of unexpected outages. BCDR Tests help to prove that services can continue to function or be effectively recovered in the event of a disaster or unforeseen outage.
2. In December 2024 DCC issued a consultation¹ to seek views from parties on two areas:
 - **Our proposal to schedule 20 BCDR Tests between April 2025 and March 2026** – 10 of these tests will impact service availability for a total of 68 hours. The proposed testing schedule can be found in Annex One. *Note – in our finalised schedule we have reduced net number of tests impacting service availability from 10 to 9 and the total number of hours down from 68 to 62.*
 - **Our draft BCDR Test Approach document** – we developed this in collaboration with Parties, to provide more information on the importance of testing and how we work to reduce the impact of test events. This document will support the progression of a recently proposed SEC Modification to improve the way we communicate with you on BCDR testing.
3. The consultation closed 10 January 2025, and this is DCCs conclusion to that consultation.
4. We received three responses to the consultation which broadly supported the proposed schedule. One response provided additional feedback on the impact of testing on Sundays for their prepayment consumers.
5. There were three responses to our draft approach BCDR Test documentation that welcomed the additional information and clarity provided. One responder raised points where they consider further consideration is required. A summary of all responses to this consultation will be provided for consideration in a recently proposed SEC Modification related to BCDR Tests.
6. We have amended the proposed schedule to move two dates away from Sundays and have scheduled those tests on Tuesday evening during Low Impact Maintenance Windows. A further amendment has been made to move an event out of a High Impact Maintenance Window based on a risk-based decision. This has resulted in one additional 6 hour outage window, though notably not one which impacts prepayment or install and Commission activities. These changes have reduced the net number of tests impacting service availability from 10 to 9, and the total number of hours down from 68 to 62.
7. We provide our final BCDR Test schedule for April 2025 to March 2026 in Annex One.

¹ [BCDR Test Schedule April 2025 – March 2026 | Smart DCC](#)

2. Background

8. The Data Communications Company (DCC) is Britain's digital energy spine, supporting the transformation of the energy system. DCC is licensed by the Government and regulated by the energy regulator Ofgem to connect smart meters in homes and small businesses across Great Britain to a single secure, digital network. DCC supports the roll-out and operation of second-generation (SMETS2) smart meters, as well as the migration and operation of existing first-generation (SMETS1) meters onto our network.

2.1. BCDR Tests

9. BCDR Procedures are a vital part of DCC services that provides resilience where unforeseen outages occur, and which ensures services can continue to be provided and minimising the impact or disruption for DCC customers and consumers.
10. SEC Section H10.9 requires that DCC comply with the BCDR Procedures described in SEC Appendix AG¹. It is that appendix which describes DCC Disaster Impacts, and the recovery action DCC should complete.
11. BCDR Tests allow for a formal assessment of procedures and provide confidence that in the event of a disaster, DCC can continue to provide services to customers. BCDR Tests also help to highlight areas for improvement so that the recovery actions are corrected and improved in preparation for any unforeseen real-world disaster.
12. We have continued to review and amend our approach to BCDR Testing in an effort to reduce the impacts tests can have on services, while still achieving confidence in the BCDR solution. Further information on our approach to BCDR Tests, including improvements overtime can be found in our original consultation², which also provided our draft BCDR Test Approach document.

3. Consultation Proposals and Conclusions

3.1. BCDR Test schedule 1 April 2025 – 31 March 2026

Question One

Do you agree with the proposed dates and timing of the BCDR Test activity provided in the BCDR Test Schedule? Please provide rationale for your response.

13. We provided details of our proposed BCDR Test dates and the draft annual outage plan in the published consultation and asked Parties if they agreed with the proposed BCDR Test activity.
14. There were three responses to this question, all from large Supplier Parties.
15. One response agreed with the proposed dates and timing of Tests noting that the majority of activity is outside normal installation hours and avoids price change events and change freeze periods.
16. One response chose not to comment on specific dates but noted the assumption DCC had planned testing while considering other industry activity. The same response noted that the activity of Parties can be planned well in advance and take in to account activity such as BCDR Tests, but short notice change can have negative impacts. The same response noted that Planned Maintenance has in the

¹ SEC Appendix AG - Incident Management Policy

² BCDR Test Schedule April 2025 – March 2026 | Smart DCC

past correlated with Incidents on the network and consider a combined BCDR Test as adding increased complexity. This responder expects DCC to monitor this risk and amend the approach if necessary.

17. Following customer feedback and requests for alternative approaches, DCC has worked hard in an effort to reduce the impact of BCDR Tests, including the consideration of when BCDR Tests could be run alongside other activity. Parallel activity has been planned where the other activity already incorporates an aspect of BCDR testing or where the risk of additional disruption is deemed low. We will monitor future testing and consider amendments to the approach if necessary.
18. There may be times where published testing dates need to be cancelled and rearranged. Cancellation can be caused by a range of operational issues, for example Parties have asked that activity causing service disruption not to be completed during severe weather events. In this scenario the notified activity would be cancelled but may be rescheduled. DCC notes the impacts that such replanning can have and works to keep such scenarios to a minimum.
19. One respondent wanted to highlight their concern regarding testing activity on Sundays between 09:00 and 17:00. This respondent is concerned that Pre-Payment customers already off supply at the beginning of the activity will not benefit from their non-disconnection period and will remain off supply during the outage.
20. DCC recognises that outage causes a disruption to the use of the network and has worked to reduce that impact while retaining confidence in BCDR capabilities. While we have historically completed activity during Sundays, at the same time as proposed in the schedule, we recognise that there may be some disruption. Furthermore, due to the differing processes implemented by a wide range of DCC Users it is not possible to complete all BCDR Tests in a manner that causes no disruption to all Parties.
21. We have reviewed 4G Device Manager BCDR testing and can confirm that we have been able to accommodate a change for both test events moving them from Sundays and combined those tests with low impact maintenance windows on Tuesdays. This change has removed 2 BCDR Test events that would impact service availability and removed 12 hours of service impacting testing.
22. We have also reviewed the risk-based approach to Accenture (ECoS) BCDR Testing and taken the decision that the failover and failback activity should be completed with less time between the two events. This decision is based on the risk associated with a prolonged provision of service on the secondary infrastructure. This change results in the failback activity being completed outside of other planned outage events. This change increases the number of windows that impact service availability by 1, and the number of hours by 6. Though it should be noted that the services related to prepayment or install and commission activity will not be impacted.
23. The net result of the changes described above is a reduction in the overall number of BCDR Test events have decreased by 1 and the total number of hours where services are impacted has reduced by 6.
24. DCC is committed to further improvement to the process of BCDR Tests to ensure disruption is kept to a minimum. To this end, we have recently proposed a SEC Modification to review the requirements of BCDR Testing and formalise our approach. We encourage parties to participate in that modification and to help develop future approaches to minimise the impact of testing while retaining confidence in DCC's ability to recover services in the event of an unforeseen outage. We hope that this modification can also be used to consider how best to implement appropriate testing which considers the impact of testing across all parties and consumers, including those on prepayment tariffs.
25. In conclusion, DCC considers the draft schedule published in the consultation, with one move away from a Sunday test as described above, a balanced approach to testing which:

- Implements live testing with minimal disruption
- Utilises parallel events where appropriate to do so
- Takes an appropriate risk-based approach where desk-based non-disruptive testing can be utilised
- Will provide valuable assurances and lessons in the event of an unforeseen outage

26. The BCDR Test Schedule covering April 2025 to March 2026 can be found in Annex 1.

3.2. BCDR Test Approach document

27. In collaboration with Parties, we have documented our approach to BCDR Tests and in the December 2024 consultation also published our draft BCDR Test Approach document.

28. We have proposed a SEC Modification (not yet assigned a reference number) to consider the requirements of engagement regarding BCDR Tests and to consider formalising the BCDR Test Approach document. This Modification will allow for collaboration across Parties to consider amendments to the current requirements and it is hoped will result in improvements in the efficiency of engagement and an improved approach to test scheduling and its documentation.

Question Two

Having reviewed the *draft* BCDR Test Approach document, do you have any comments on the approach, or any additional sections / details that should be included in final documentation? Please provide rationale for your response.

29. We asked parties to review the draft BCDR Test Approach document and provide comments. There were three responses to this question from three large Supplier Parties.

30. There were three responses to this question, all from large Supplier Parties.

31. One response stated they were happy with the approach and noted that they considered the draft document to be comprehensive in addressing the necessary aspects of BCDR Tests. This responder had no further comments to provide for the final document.

32. One respondent provided that they considered a risk-based decision on BCDR Tests should be taken by a body such as the Technical Architecture and Business Assurance Sub-Committee¹ (TABASC), alongside DCC decisions. This respondent also noted that they consider that Planned Maintenance is often followed by major Incidents and that additional checks are required post Maintenance to ensure systems are working as expected. We have put in place enhanced checks to improve outcomes and will continue to look for additional opportunities to provide more certainty.

33. One response welcomes the additional clarity the document provides but provided three areas where further consideration should be given:

- a. Notification of changes where it is not possible to consult or provide 60 working days notice of those changes

¹ [Technical Architecture and Business Architecture Sub-Committee \(TABASC\) - Smart Energy Code](#)

- b. The justification for adding BCDR Tests for new services, and why those cannot be planned in advance, and the impact a shorter notification of testing might have on users and Consumers
 - c. The documentation of go / no go decision making
34. The responses received will be provided to the modification working group considering formalisation of the BCDR Test Approach document.

4. Next Steps

35. DCC will continue to look for opportunities to reduce the impact of BCDR Tests and will review post-test- activity to determine whether the approach to combine BCDR Test activity with other system activity has been successful.
36. We consider that the recent DCC proposed BCDR related Modification Proposal will allow DCC and Parties to work together collaboratively to consider the approach and to identify further areas for improvement.
37. The final BCDR Test Schedule for April 2025 to March 2026 is presented below. These dates will also be provided in the annual outage plan available on the DCC SharePoint and in our monthly communication covering Planned Maintenance and BCDR Tests.
38. Where scheduled BCDR Tests need to be cancelled, for example due to a severe weather warning, we will aim to provide as much notice as possible for that cancellation and for any rescheduled event.

5. Annex One – April 2025 to March 2026 BCDR Test Schedule

Service Provider (Service)	Live test	Combined with other activity	Date and time period	Hours of service impact caused by BCDR*	Test description	SMETS1 / SMETS2 / Both	Key service impact area (region or SMETS1 cohort)**	
							Pre-Payment	Install and Commission
Accenture (4G Device Manager)	Yes	No	Tuesday 27 May 2025, 2000 – 0200	0 hours	Failover	SMETS2	4G S&C	4G S&C
Accenture (4G Device Manager)	Yes	No	Tuesday 3 June 2025, 2000 – 0200	0 hours	Failback	SMETS2	4G S&C	4G S&C
VMo2 (CSP C&S)	Yes	Yes	Quarterly	0 hours	Failover / failback. Executed in support of Planned Maintenance	SMETS2	Not applicable	Not applicable
Accenture (ECoS)	Yes	Yes	Tuesday 9 September 2025, 2000 - 0200	0 Hours	Failover. Executed during High Impact Maintenance Window	SMETS2	Not applicable	Not applicable
Accenture (ECoS)	Yes	No	Sunday 14 September 2025, 0900 - 1500	6 Hours	Failback	SMETS2	Not applicable	Not applicable
BT (SMKI)	No	No	Quarter 2 2025	0 hours	Simulation testing	SMETS1/2 & SMKI	Not applicable	Not applicable
Arqiva (CSP N)	Yes	No	Sunday 08 June 2025, 0900 – 1700	8 hours	Failover	SMETS2	CSP N	CSP N
Vodafone (4G CSP C&S)	Yes	Yes	Tuesday 10 June 2025, 2000 – 0200	0 hours	Network link resilience testing (AWS)	SMETS2	Not anticipated	Not anticipated

Service Provider (Service)	Live test	Combined with other activity	Date and time period	Hours of service impact caused by BCDR*	Test description	SMETS1 / SMETS2 / Both	Key service impact area (region or SMETS1 cohort)**	
							Pre-Payment	Install and Commission
Arqiva (CSP N)	Yes	No	Sunday 15 June 2025, 0900 – 1700	8 hours	Failback	SMETS2	CSP N	CSP N
Vodafone (4G CSP C&S)	Yes	Yes	Tuesday 17 June 2025, 2000 – 0200	0 hours	Network link resilience testing (DSP)	SMETS2	Not anticipated	Not anticipated
Vodafone (4G CSP C&S)	Yes	Yes	Tuesday 8 July 2025, 2000 – 0200	0 hours	Network link resilience testing (Azure)	SMETS2	Not anticipated	Not anticipated
Vodafone (4G CSP C&S)	Yes	Yes	Tuesday 15 July 2025, 2000 – 0200	0 hours	Network link resilience testing (Gamma)	SMETS2	Not anticipated	Not anticipated
Secure (MOC S1SP)	Yes	No	Saturday 26 July 2025, 2000 – 0200	6 hours	Failback. DCC is investigating options for non-disruptive testing if appropriate	SMETS1	MOC	Not applicable
CGI (DSP)	Yes	No	Sunday 19 October 2025, 0900 – 1700	8 hours	Failover	SMETS1/2 & SMKI	All Services UK wide	All Services UK wide
CGI (DSP)	Yes	No	Sunday 26 October 2025, 0900 - 1700	8 hours	Failback	SMETS1/2 & SMKI	All Services UK wide	All Services UK wide
Vodafone (4G CSP C&S)	No	No	Quarter 4 2025	0 hours	AWS Resilience Hub Assessment	SMETS2	Not applicable	Not applicable
Capgemini (DCO)	Yes	No	Sunday 01 March 2026, 0900 - 1500	6 hours	Failover and failback	SMETS1	IOC MOC FOC	Not applicable

Service Provider (Service)	Live test	Combined with other activity	Date and time period	Hours of service impact caused by BCDR*	Test description	SMETS1 / SMETS2 / Both	Key service impact area (region or SMETS1 cohort)**	
							Pre-Payment	Install and Commission
DXC (FOC S1SP)	Yes	No	Sunday 08 March 2026, 0900 – 1500	6 hours	Failover	SMETS1	FOC	Not applicable
DXC (FOC S1SP)	Yes	No	Sunday 15 March 2026, 0900 - 1500	6 hours	Failback	SMETS1	FOC	Not applicable
CGI SIE (IOC S1SP)	No	No	Quarter 1 2026	0 Hours	Simulation testing	SMETS1	Not applicable	Not applicable
Capgemini (Commissioning Party SMETS1)	No	No	Quarter 1 2026	0 hours	Simulation testing	SMETS1	Not applicable	Not applicable

*Details the length of time allowed where services could be impacted by a BCDR Test event. Where live tests are scheduled to be completed alongside other system impacting activity, we have noted 0 hours, because that system outage is captured through other activity and not primarily caused by the BCDR Test.

** Details the service impact of BCDR Testing where that service is not expected to be available (prepayment vend and install and Commission activity). Where live tests are scheduled to be completed alongside other system impacting activity, we have noted not applicable, because that system outage is captured and notified through other activity and not primarily caused by the BCDR Test.