

Business Continuity Disaster Recovery Testing

Your chance to comment on the proposed BCDR 2024 - 2025
Testing Schedule

Date: 05/12/2023

Respond by: 08/01/2024

Author: consultations@smartdcc.co.uk

Classification: DCC Public

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1. Introduction and Context

1. 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.

1.1. Summary

2. DCC is required to have in place Business Continuity Disaster Recovery (BCDR) procedures and to test those procedures at least one annually. Testing often also results in downtime where the Services, or a subset of them, are unavailable for the duration of the test and so there can be an impact to users. Overtime DCC has changed the approach to BCDR Testing in response to User feedback where those changes have been targeted to reduce the impact to Users.
3. DCC Users are invited to provide details of their own internal system changes so that plans can continue to be informed by those processes.
4. The BCDR Testing schedule is provided in Annex 1 and DCC invites Users to respond and provide feedback to the proposed schedule and approach and provide any other requests or recommendations to help reduce the impact of testing.

1.2. Background

5. Smart Energy Code (SEC) H10.9 requires DCC to have BCDR Procedures in place to ensure that in the event of a disaster there is no significant disruption to Services and that Services can be restored as soon as possible.
6. SEC H10.11 places an obligation on DCC to periodically test, at least annually, the BCDR arrangements in order to assess whether they remain suitable for achieving the objectives set out in SEC H10.9.
7. SEC H10.12A requires that DCC consult with Parties and SEC Panel before completing any BCDR Testing. DCC is consulting in advance to ensure that (insofar as is reasonably practicable) BCDR Tests are undertaken in such a way as to minimise any disruption to the provision of the Services.
8. BCDR Testing results in downtime of DCC services, and DCC is aware of the need to keep downtime to a minimum so as to reduce disruption for Users. Overall downtime can be impacted by other activities such as Planned and Unplanned Maintenance.

1.3. Previous amendments and improvements

9. DCC has considered feedback received from Parties which would reduce the impact on them and their customers. Where possible DCC has amended the approach to BCDR Testing in an effort to reduce the impact.
10. At the request of Users, DCC now includes BCDR Testing activity in the mass communication detailing Planned Maintenance. This is a monthly e-mail notification to all Users which provides a schedule of all planned downtime in the upcoming month and the Services which will be impacted.

11. In recognition of Parties desire to see combined outage plans DCC has proposed a SEC Modification that would look to align the engagement requirements across BCDR Testing and Maintenance activities.
12. Party feedback has suggested that the use of contingency dates for individual tests and contingency time within a test window are not valuable. Especially when these contingencies are not utilised but where Parties need to plan on the understanding that the Services will be unavailable. DCC has already removed these dates and times from previous BCDR Test schedules and will continue to do so.
13. Parties also asked if BCDR Tests of individual Service Providers (SPs) could be combined. While it is not always possible to combine tests since it can make issue identification, where required, difficult DCC continues to investigate this possibility and will allow individual SPs to complete parallel BCDR Tests where appropriate.
14. Parties have expressed their desire that BCDR Testing should not be completed during the winter months due to the potential for Met Office issued weather warnings, the potential impact on consumers and Power Outage Alerts. DCC already attempts to keep testing activity away from winter months where appropriate but as a consequence downtime is condensed over the fairer weather period and between March and October. DCC will continue to monitor for weather warnings before commencing a BCDR Test.
15. Historical information provided by Parties suggests that the majority complete their own internal system maintenance / releases on Saturdays and DCC is often asked to avoid these days. DCC already minuses BCDR Tests on Saturdays as much as possible and will continue to do so in the 2023 – 2024 schedule.

1.4. Purpose of the consultation

16. The purpose of this consultation is to provide Parties with details of the proposed dates and timings of BCDR Testing schedule for 2024 to 2025 and seek feedback on the proposal. The full schedule of BCDR testing can be found in Annex 1.
17. DCC has considered other system downtime while planning the 2024 – 2025 BCDR Testing schedule and will continue to share regular combined plans with industry through the SEC Operations Group and mass communications. It is anticipated that a combined plan will be presented to the January 2024 SEC Operations Group. Whilst DCC notes the linkage between any activity resulting in downtime, separations exist between the allowance for Planned Maintenance activities and the requirement to complete BCDR Testing. This consultation focuses solely on BCDR Testing activity.
18. Parties can respond to this consultation by e-mailing consultations@smartdcc.co.uk. This consultation will close on the 8th January 2024 at 1200.

2. Testing scope

19. The scope of BCDR Testing as required under Section H10 of the SEC includes those tests required under SEC Appendix AG – Incident Management Policy. Specifically, the scope of BCDR Testing is to prove the following:
 - That each SP can achieve failover or failback between their datacentres within the contracted 4-hour Recovery Time Objective (RTO). This is where system functions are switched between a primary and secondary data centre.
 - That each SP can successfully continue to operate from their secondary datacentre for at least one week, while also proving continuity of services in respect of SMETS2 and SMETS1 services.
 - That all SPs and DCC Users can continue to operate and communicate successfully in conjunction with other SP primary or secondary datacentre, whichever configuration is in place for service availability.
 - That, in respect of SMETS1, the DCC Migration Control Centre (MCC) can continue to operate and carry out migrations when SMETS1 SPs are operating from the secondary site.
 - That DCC Services can be restored to required operating functionality.
 - That SPs can demonstrate their BCDR capability by testing their BCDR plan to maintain an effective continuity capability that is aligned to the SEC.

3. Proposed Testing Approach

20. DCC recognises that there is never an ideal time for system downtime, but that the importance of a robust BCDR process is invaluable in the event of a major issue.
21. DCC has a range of Users, each working in their own manner with processes that best meet their needs. This includes different approaches to their own internal system changes where there is no alignment of process across Users or User Roles. As such it is not possible for DCC to implement BCDR Testing in a manner that perfectly suits each User and meets the priorities of all. DCC has considered the feedback and activities across the User base and has planned activity that is understood to be the least disruptive. The testing activity must also meet the BCDR Testing obligations from a regulatory perspective and help to prove the existence of robust and resilient BCDR processes.
22. A total of ten SPs will participate in BCDR Testing, with all but two completing a separate failover and failback test, this year CSPs will complete simultaneous BCDR Testing.
23. Without continuing to implement the improvements described in section 1.2 the 2024 – 2025 schedule would include 40 BCDR Test windows with a total of 320 hours of testing. However, by continuing with the improvements and by combining BCDR Testing the impact has been reduced to 14 BCDR Test windows with a total of 88 hours of testing.
24. In light of the quarterly tariff update events, where Supplier Parties update high volumes of their customer tariffs, DCC has also avoided completing BCDR Testing activity where these events are likely to take place.
25. DCC has provided details of planned BCDR Test dates and times in this consultation – please refer to Annex 1.
26. DCC will confirm which SP will undertake a BCDR Test in each test window closer to the testing date. This approach will allow DCC to schedule tests over the year as required.

27. DCC is continuing investigations to establish the possibility of completing BCDR Tests during periods of Planned Maintenance to help further reduce disruption for users. If this is deemed appropriate there could be further reductions in overall downtime.
28. DCC has previously asked that Users provide details of their own internal system changes since this information can aid future planning, DCC would like to continue with this approach. To inform future planning DCC invites Users to once again provide details of their current approach to internal system changes.

Q1

Please provide detail of your organisation's internal system changes including what day of the week that activity is more likely to happen, and the timing of any windows. Please provide as much information as possible to help inform future planning.

29. During each failover and failback activity, it is expected that availability of Services will be impacted and will not be available for the duration of the outage windows provided. DCC will continue to engage with Parties as follows:
 - Regularly by email communication with Parties to provide updates on BCDR activities aligned to the forward schedule of change so that conflicts with Users' internal planned change activities can be discussed, and measures can be agreed in advance where possible to avoid risking both activities.
 - Up to date information provided via the Self-Service Interface and forward schedule of change, with guidance on planned BCDR activities that may result in service disruption.
 - Engagement with Parties reviewing BCDR activity in conjunction with other activities that may result in system outages, such as Planned Maintenance.
 - Monthly BCDR Testing included in monthly Planned Maintenance communications.

Q2

Are there any other engagement activities that you consider would be useful to keep users informed on BCDR Testing? Please provide a rationale for your response.

30. A full proposed schedule of testing windows is provided in Annex 1 of this consultation, including the date of the test, and the timing of the test.
31. DCC will confirm through SEC Operations Group and the monthly Planned Maintenance communications which SP will complete a BCDR Test in the scheduled window.

Q3

Do you agree with the proposed dates and timing of the BCDR Testing activity? Please provide a rationale for your response.

32. Following each failover and failback test DCC will conduct validation checks to ensure any issues have been identified and can be resolved. This activity will provide assurance that testing activity has completed, and systems are operating as expected. This activity will not result in any additional service disruption.
33. DCC understands that downtime is disruptive for customers and that a reduction in downtime is desired and has, where possible, changed the approach based on customer feedback. The current BCDR Testing approach is designed to provide assurance of, and robustly test, DCC BCDR capability and to comply with SEC requirements. DCC welcomes

views from Parties on how the testing approach might be changed to better service customers.

Q4

DCC welcomes any further comment or suggestions on the approach to BCDR Testing, including how the User impact might be reduced.

4. Next Steps

34. This consultation will close on 8th January 2024 at 1200 when DCC will review responses and consider if any changes to the proposals made are required.
35. DCC will present details of the planned BCDR Test calendar and consultation responses to the SEC Operations group in January 2024 and gather further views.
36. Once feedback has been provided DCC will confirm the 2024 – 2025 BCDR Testing Schedule by end of January 2024.

5. How to Respond

37. Please provide responses by 1200 on 8th January 2024 to DCC at consultations@smartdcc.co.uk
38. Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part, of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department for Energy Security and Net Zero (DESNZ) and the Gas and Electricity Markets Authority (the Authority). Information provided to DESNZ or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If DESNZ or the Authority receive a request for disclosure of the information, we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.
39. If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk

6. Annex 1 – Business Continuity and Disaster Recovery test Schedule

The below BCDR Testing schedule shows the periods of planned outages to services during 01 April 2024 to 31 March 2025 for BCDR Testing.

All BCDR Test dates, along with the outages associated with the proving exercise will be further communicated, providing updates where applicable, including confirming tests dates that are due within the next three months and those that may have changed.

| Date | Outage Window | BCDR Duration (hrs) |
|-----------------------|---------------|---------------------|
| Sunday 21-Apr-2024 | 09:00 – 15:00 | 6 |
| Sunday 28-Apr-2024 | 09:00 – 15:00 | 6 |
| Sunday 12-May-2024 | 09:00 – 15:00 | 6 |
| Sunday 19-May-2024 | 09:00 – 15:00 | 6 |
| Thursday 06-Jun-2024 | 20:00 – 02:00 | 6 |
| Thursday 13-Jun-2024 | 20:00 – 02:00 | 6 |
| Sunday 28-Jul-2024 | 09:00 – 15:00 | 6 |
| Saturday 03-Aug- 2024 | 20:00 – 02:00 | 6 |
| Sunday 04-Aug-2024 | 09:00 – 15:00 | 6 |
| Saturday 21-Sep-2024 | 20:00 – 02:00 | 6 |
| Sunday 13-Oct-2024 | 09:00 – 17:00 | 8 |
| Sunday 20-Oct-2024 | 09:00 – 17:00 | 8 |
| Sunday 02-Mar-2025 | 09:00 – 15:00 | 6 |
| Sunday 09-Mar-2025 | 09:00 – 15:00 | 6 |