

Business Continuity Disaster Recovery Testing

Your chance to comment on the proposed BCDR 2023 – 2024
Testing Schedule

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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. Background

2. Smart Energy Code (SEC) H10.9 requires DCC to have Business Continuity Disaster Recovery (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.
3. SEC H10.11 places an obligation on DCC to periodically test the BCDR arrangements in order to assess whether they remain suitable for achieving the objectives set out in SEC H10.9.
4. SEC H10.12A requires that DCC consult with Parties and SEC Panel before completing and BCDR testing. DCC is consulting in advance to ensure that (insofar as is reasonably practicable) the Test is undertaken in such a way as to minimise any disruption to the provision of the Services.
5. BCDR testing results in downtime of DCC services, and DCC is cognisant of the need to keep downtime to a minimum. Overall downtime can be impacted by other activities such as Planned and Unplanned Maintenance.
6. While the BCDR testing has been planned with other downtime in mind, this consultation will focus on BCDR testing activities. Combined downtime activities, including BCDR Testing and Planned and Unplanned Maintenance, will be presented to Parties through the SEC Operation Sub-Committee and SEC Panel.

1.2. Purpose of the consultation

7. The purpose of this consultation is to provide Parties with details of the proposed dates and timings of BCDR testing and seek feedback on the schedule.
8. Parties can respond to this consultation by e-mailing consultations@smartdcc.co.uk. This consultation will close on the 3 March 2023 at 1700.

2. Testing scope and other system downtime

2.1. Scope

9. The scope of 2023/2024 BCDR testing as required under Section H10 of the SEC includes those Service Providers who provide DCC Services, and any other Service Providers or services are out of scope. Specifically, the scope of 2023/2024 BCDR testing is to prove the following:
 - That each Service Provider can achieve failover or failback between their datacentres within the contracted 4-hour Recovery Time Objective (RTO).
 - That each DCC Service Provider can successfully continue to operate from their secondary datacentres for at least one week, while also proving continuity of services in respect of SMETS2 and SMETS1 services.
 - That all DCC Service Providers and DCC Users can continue to operate and communicate successfully for at least one week in conjunction with other Service Providers' 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 Service Providers are operating from the secondary site.
 - That DCC Core Services can be restored to levels that meet stakeholder, customer, and regulatory obligations.
 - That Service Providers can demonstrate their BCDR capability by testing their BCDR plan to maintain an effective continuity capability that is aligned to the SEC.
10. A separate schedule for each Service Provider will be agreed to validate their BCDR capability to meet DCC's BCDR objectives. Each testing schedule will be impact assessed with other tests schedules and where possible arrangement for conducting multiple tests on the same day will be / have been agreed.
11. DCC recognise that Systems should be available for Users as much as is possible, and notes the link between BCDR activity and other downtime, such as that required by Maintenance Releases. While overall downtime should be kept to a minimum DCC does not consider it appropriate to run BCDR testing in parallel with Maintenance Releases or System Releases since this could introduce additional risk to either activity.
12. DCC have considered other system downtime while planning the 2023 – 2024 BCDR schedule and will share combined plans with industry. While DCC notes the linkage between any activity resulting in downtime, separations exist between the allowance for Planned Maintenance activities and the separate requirement to complete BCDR testing. This consultation focuses solely on BCDR testing activity.

3. Proposed dates and times

13. 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.
14. DCC have a range of Users, each working in their own manner with processes that best meet their needs and the needs of their customers. 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.

13. A total of nine Service Providers will participate in BCDR testing, with all but one completing a separate failover and failback test, representing a total of 17 test activity periods. In an effort to keep overall downtime to a minimum, DCC has, where risk and timing allow, scheduled some tests to coincide with others with a total of 11 testing windows. Here a total of 17 test activities have been consolidated in to 11 testing windows.
14. Previous feedback suggests that DCC Users predominantly run their own internal system maintenance / releases on Saturdays and DCC is often asked to avoid these days. Saturdays have therefore been avoided as much as possible in the schedule presented below. DCC would like to understand User internal system changes in more detail to help plan future testing.

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 window. Please provide as much information as possible to help inform future planning.

15. DCC recognises that Users have suggested that system downtime is easier to manage during the summer months where system demand may be lower. BCDR activity has considered maintenance and other activity including SMETS1 migrations. For this schedule, prioritising BCDR testing in the summer months would negatively impact SMETS1 migration. As a result, we are not proposing to prioritise BCDR testing in the summers months, but this will be revisited in future years.
16. Following feedback from Parties, DCC understands that the provision of contingency dates and times to be used where a test is unsuccessful is not helpful, since Parties must assume that there will be system downtime and disruption to services. There is no regulatory requirement for contingency tests to be planned, and DCC recognises the disruption this can cause.
17. Given this, and the fact that this contingency has not been utilised in the past, DCC has not proposed any contingency periods in the 2023 – 2024 schedule. Where additional testing dates are required DCC will engage through the SEC Operations Sub-Committee and confirm any additional dates to Parties as soon as possible.

Q2

Do you agree with the removal of contingency dates from the BCDR schedule? Please provide a rationale for your response.

18. Following Party feedback, DCC has also removed the contingency hours for each test window. Nine of the 11 tests windows scheduled have a 6 hour window, while the remaining two have an eight hour window.
19. It is noted that a reduced window introduces a risk where a problem or an issue occurs with the failover or failback activity. In these scenarios the activity required to reinstate services may go beyond the six hour window.

Q3

Do you agree with the shorter testing windows, and the removal of contingency hours? Please provide a rationale for your response.

20. During each failover and failback activity, it is expected that production services 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 Service User's internal planned change activities can be discussed, and measures can be agreed in advance where possible to avoid risking both activities.
- Quarterly updates and presentation at SEC Operations Sub-Committee to share BCDR updates and forward plans that may impact service availability.
- 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.

Q4

Are there any other engagement activities that you consider would be useful? Please provide a rationale for your response.

19. A full proposed schedule is provided in Annex 1 of this consultation, providing details of the Service Provider completing the test, the test activity, the date of the test, and the timing of the test.

Q5

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

20. 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.

4. Next Steps

21. This consultation will close on 3 March 2023 when DCC will review responses and consider if any changes to the proposals made are required.
22. DCC will present details of the planned BCDR test calendar and consultation responses to the SEC Operations Sub-Committee and gather further views.
23. Once feedback has been provided DCC will confirm the 2023 – 2024 BCDR Testing Schedule as soon as possible.

5. How to Respond

24. Please provide responses by 1700 on 3 March to DCC at consultations@smartdcc.co.uk
25. 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 Business, Energy and Industrial Strategy (BEIS) and the Gas and Electricity Markets Authority (the Authority). Information provided to BEIS 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 BEIS 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.

26. If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk

6. Annex 1 – Impact on the Services

The impact on Service Users during each proving exercise window will be as follows:

- The DUIS will be closed, and no new Service Requests will be accepted. No Alerts or responses will be delivered.
- All DSP Future Dated and Scheduled events that are due to be executed during each Maintenance window will be suspended and restarted after the window ends.
- Future Dated, Scheduled, and other events originating from the HAN during the outage period will not be delivered.
- The SSI will be unavailable during a DSP testing arrangement but is expected to be available during all other testing schedules.
- The Service Desk will remain open and contactable via email and telephone during all outages.
- The SMKI Services will be unavailable during a TSP failover & failback test. But is expected to be available during all other testing schedules.
- The daily file transfers from the DSP will be disabled, although inbound Registration files will still be received from the RDPs and the data applied at the end of each proving exercise window.
- Active meter Firmware downloads will be interrupted and therefore terminated due to shutdown of the motorway. Disrupted Firmware downloads will need to be re-initiated post BCDR test.
- The Change window is effective between the hours stated during which production services will not be available.
- Key Services for SMETS1 and SMETS2 will not be available during the BCDR testing planned window.

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

The below BCDR Plan testing programme shows the periods of planned outages to services during 01 April 2023 to 31 March 2024 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 two months and those that may have changed.

Date	SMETS BCDR Proving Activity	Outage Window 4 Hours RTO	Durations (hrs)	Affected Services
Thursday 20 July 2023	TSP (BT) – DR Failover	20:00 – 02:00	6	SMETS1 and SMETS2, Smart Metering Key Infrastructure (SMKI)
Thursday 27 July 2023	TSP (BT) – DR Failback	20:00 – 02:00	6	SMETS1 and SMETS2, Smart Metering Key Infrastructure (SMKI)
Saturday 05 Aug 2023	Secure Meters – DR Failover	20:00 – 02:00	6	MOC SMETS 1
Saturday 23 Sept 2023	Secure Meters – DR Failback	20:00 – 02:00	6	MOC SMETS 1
Sunday 10 Sept 2023	DXC/Trilliant – Resilience & SFTP DR Failover	09:00 – 15:00	6	FOC SMETS1
Sunday 17 Sept 2023	DXC/Trilliant – Resilience & SFTP DR Failback	09:00 – 15:00	6	FOC SMETS1
Sunday 08 Oct 2023	DSP - Failover	09:00 – 17:00	8	Total system
Sunday 15 Oct 2023	DSP - Failback	09:00 – 17:00	8	Total system
Sunday 25 Feb 2024	CSP SC - DR Failover CSP N – DR Failover CP – DR Failover DCO – Resilience & SFTP	09:00 – 15:00	6	ARQ/VM02 - SMETS2 CP/DCO - SMETS1
Sunday 03 Mar 2024	CSP SC - DR Failback CSP N – DR Failback CP – DR Failback	09:00 – 15:00	6	ARQ/VM02 - SMETS2
Sunday 10 Mar 2024	SIE – Resilience & SFTP Failover/Failback	09:00 – 15:00	6	IOC SIE – SMETS1

