



Business Continuity Disaster Recovery Testing

Consultation Conclusions on the DCC proposed BCDR 2024 -
2025 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. Summary

2. DCC is required to have in place Business Continuity Disaster Recovery (BCDR) procedures and to test those procedures at least once annually. Testing often 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 Parties. Over time DCC has updated the approach to BCDR Testing, including in response to User feedback, where those changes have been targeted at reducing the impact to Parties.
3. On the 5th of December 2023 DCC issued a consultation on the 2024 – 2025 BCDR Testing Schedule and invited feedback from SEC Parties. Parties were invited to provide details of their own internal system changes which would help inform future DCC planning and provide feedback on the proposed 2024 – 2025 BCDR testing schedule.
4. DCC received four responses to the consultation, one from a Network Party and three from large Supplier Parties. Some feedback recognised the work that DCC had done to reduce testing and limit the impact to Parties, other feedback requested that DCC consider further reductions. Parties were asked to detail their own approach their own system changes and responses suggest there is no pattern across respondents. And on engagement respondents considered the current approach, including the monthly mass communications, to be sufficient and one respondent asked that additional detail on the impact of testing to be provided.
5. One response challenged DCC's interpretation of the regulatory requirement to complete BCDR Testing, and requests for DCC to continue to consider ways to reduce overall testing downtime and the impact to Parties.

1.2. Background

6. 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.
7. 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.
8. SEC H10.12A requires that DCC consult with Parties before completing any BCDR Testing.
9. 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 Parties. Overall downtime can be impacted by other activities such as Planned and Unplanned Maintenance.
10. Considering previous feedback from Parties DCC had amended the approach to testing to reduce the impact to Parties. The improvements have included the removal of contingency dates and times within the schedule, which has significantly reduced down time, and the scheduling of tests away from winter months where weather warnings are likely to impact consumers.

11. DCC provided the proposed 2024 - 2025 BCDR Testing schedule with the consultation which can also be found in Annex 1 of this document.

2. Consultation Responses

12. In December 2023 DCC published a consultation which provided details of the approach to BCDR Testing and the proposed 2024 – 2025 BCDR Testing schedule. DCC posed four questions and received four responses to the consultation, one response was from a Network Party and three responses from Large Energy Supplier Parties. A summary of the responses received is presented below.

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.

13. This question invited Parties to provide information on their approach to system changes. The detail was requested to help inform future planning of DCC system updates or testing.
14. Three Parties provided details to this question. The responses suggests that there is no alignment across Parties in the approach to their internal system updates with each User taking opting for different strategies on the timing of their update. The information provided does not suggested that it is possible for DCC to plan BCDR Testing around User activity.

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.

15. Question two asked Parties if they considered whether any changes to the engagement on BCDR Testing would be beneficial. Parties responded with approval of the current approach to engagement where details are provided to the SEC Operations Sub-Committee and through the monthly maintenance communications. One user asked that additional information on the impact of each BCDR be added the monthly maintenance communications.
16. DCC is working to improve the information provided on the impact of individual BCDR Tests in the monthly maintenance communications.

Q3

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

17. This question asked if Parties supported the published 2024 -2025 BCDR Testing schedule.
18. One response recognised that there is no ideal time for testing and system downtime, but also considered that DCC had worked to find the least disruptive times possible.
19. One response asked if completing failover and fallback activity (moving from the primary server to the secondary server and back again) on a single day was a high-risk strategy. DCC consider that this approach is suitable for some services and helps to reduce the overall impact of testing. This approach will only be taken where it is appropriate to do so.

Q4

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

20. This question sought any other relevant views held by Parties.
21. One response challenged the regulatory requirements for BCDR Testing and the DCC interpretation and implementation of those requirements. DCC recognises that system downtime, including that caused by BCDR Testing, can be inconvenient to Parties. However, DCC also considers that it is vital to test individual elements of total systems to ensure that in the event of an unplanned outage Services can be restored as soon as possible. DCC also consider the Smart Energy Code obligations to require multiple BCDR capabilities as detailing in Appendix AG, all of which are required to undergo an annual test under SEC H10.11.
22. Other responses asked that DCC continue to seek improvements to minimise disruption to Parties including the completion of parallel BCDR Testing and / or Maintenance. DCC confirms that opportunities to reduce User impact and reduce overall downtime continue to be investigated and that opportunities to reduce downtime will be taken where it is appropriate to do so. DCC also confirms that where new Service Providers are contracted that consideration to the most appropriate means of BCDR Testing is taken.

3. SEC Operations Sub-Committee Engagement

23. DCC intended to present details of the 2024 - 2025 BCDR Testing consultation and feedback to the SEC Operations Sub-committee at the 16th of January 2024 meeting but the session was postponed. To meet the regulatory requirement on the provision of notice DCC issued the BCDR Testing schedule to all Parties through mass communications on the 24th of January 2024.
24. DCC presented the schedule and consultation feedback to the 29th of January 2024 SEC Operations Sub-committee and sought feedback and any additional comments. This included discussion and comment on the volume of testing and the regulatory obligations. DCC reiterated the position that testing is required to provide assurance that Services can be re-established within target recovery timescales in the event of an unplanned outage, and that the approach aligns to the regulatory obligations.
25. DCC committed to providing additional information to the committee on the approach to planning BCDR Testing. DCC also committed to continuing to seek opportunities to reduce the disruption to Parties.
26. Independent advice / interpretation of the SEC requirements on BCDR Testing was also requested by members which will be provided later.
27. On review of the annual outage plan (a combination of planned BCDR Testing and Maintenance) the committee endorsed the proposals.

4. Next Steps

28. DCC has provided the 2024 - 2025 BCDR Testing schedule to Parties through mass communications issued 24th of January 2024. The schedule can also be found in Annex 1 of this document. Where any changes to the schedule are required DCC will provide as much notice as possible.
29. DCC will continue to investigate opportunities for reducing the overall impact of downtime caused by BCDR Testing but remains committed to ensuring systems are robust in the event of an unplanned outage.
30. For questions any and support please contact - bcdrtteam@smartdcc.co.uk

5. 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.

Additional confirmation of the BCDR Testing, and the impact to services will be provided in the monthly Maintenance communications issued to Parties through DCC mass communications.

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