



DCC Consultation on BCDR Tests

April 2026 – March 2027
BCDR Test Schedule

Version: 1.0
Date: 7th November 2025
Closure Date: 5th December 2025
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Classification: DCC Public

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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 validate that these procedures enable Services to continue to function or be effectively recovered in the event of a disaster or unforeseen outage.
2. This is our annual consultation on proposed test dates scheduled between April 2026 and March 2027. DCC continues to implement opportunities to reduce the impact of BCDR Tests while ensuring confidence that BCDR procedures can be successfully implemented in the event of unplanned outages.
3. BCDR Tests have been organised into the following categories:
 - a. Non-Service Impacting BCDR Tests outside of DCC Live Systems (see Appendix One)
 - b. Non-Service Impacting DCC Live System BCDR Tests (see Appendix Two)
 - c. Service Impacting DCC Live System BCDR Tests (see Appendix Three)
4. In total we have scheduled 17 BCDR Tests across nine Service Providers. Of these 11 BCDR Tests will not result in additional disruption of Services. Six of these tests will impact the provision of Services with a total of 42 hours across the 12-month calendar. The 2026 - 2027 schedule includes tests for two new, additional, Service Providers for this year but we have been able to reduce the overall outage compared to the planned 88 hours for the 2025 – 2026 schedule.
5. Details of tests scheduled in each of the categories above can be found in the Appendices. This consultation seeks feedback on our proposed BCDR Test schedule.
6. Parties are invited to respond to the consultation by 17:00 on Friday 5th December 2025 to DCC at consultations@smartdcc.co.uk.

2. Background

7. 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 operation of existing first-generation (SMETS1) meters on our network.

2.1. The need for BCDR Tests and Exercises

8. BCDR procedures are a vital part of DCC Services that provides resilience where unforeseen outages or disruptions occur, and which ensures Services can continue to be provided minimising the impact or disruption for DCC customers and consumers.
9. BCDR Tests and exercises allow for a formal assessment of procedures and provide confidence that in the result of a disaster, DCC can continue to provide Services to customers. They also help to highlight areas for improvement so that the recovery actions are corrected and improved in preparation for any unforeseen real-world disaster.
10. SEC Section H10.9 requires that DCC comply with the BCDR Procedures described in SEC Appendix AG.¹ It is that appendix which describes DCC Disaster Impacts, and the recovery action DCC should complete.
11. We also work to compliance with ISO 22301 which sets out standards and best practices for business continuity. This standard describes BCDR exercises, which we consider to be another term for a BCDR Test.

2.2. Approach and improvements over time

12. Our approach to testing has evolved over time and we will continue to work in minimising any disruption to Parties caused by BCDR Tests and manage risk. Following engagement and customer feedback from previous years, a broader range of approaches to testing and exercising have been considered and implemented to reduce the impact of BCDR Tests on DCC customers.
13. DCC has worked with Parties to describe our BCDR Test Approach Document, published alongside this consultation. Readers will note that the document is marked as *draft*. We have proposed that the document is formalised under SEC MP289.² When this modification is approved the documentation will formally move to our final version.
14. Readers are encouraged to review the approach document to gain insight in to how we currently plan and schedule BCDR Tests; we do not repeat the content of the approach document here. Parties are welcome to provide feedback on the approach document should they wish to do so.
15. Over the previous two periods our approach has changed in efforts to reduce the impact of testing, and we will continue to consider customer feedback and any suitable changes to our approach in the future. For example, we have reduced the impact of BCDR Tests by:
 - a. The reduction of contingency time within a scheduled test
 - b. The removal of contingency dates from the testing schedule

¹ SEC Appendix AG - Incident Management Policy

² BCDR Engagement - Smart Energy Code

- c. Completing live tests during existing periods of planned downtime
- d. Completing live BCDR tests within the same window as other BCDR Tests
- e. Remaining on secondary infrastructure for longer durations
- f. Utilising Planned Maintenance and incidents to further validate and assess procedures
- g. Implemented a risk-based approach, which requires live testing only when necessary or when deemed to be required based on the size of the risk exposure to DCC and its Services

2.3. BCDR Test Communications

- 16. DCC provides regular BCDR Test communications combined with the monthly maintenance communications. We engage with SEC Parties annually to provide details of the proposed BCDR Test Schedule and propose a schedule covering April to March each year.
- 17. This consultation presents the proposed testing schedule covering 1st April 2026 to 31st March 2027 and provides the opportunity for Parties to comment and feedback on the testing schedule.

3. Consultation Proposals

3.1. BCDR Test schedule 1st April 2026 – 31st March 2027

- 18. We utilise the principals detailed in our BCDR Test Approach Document and have endeavoured to keep any disruption caused by the testing activity to a minimum. We continue to implement our risk-based approach to scheduling live tests, including consideration of the outcomes of previous tests, and look to run tests in parallel to other activity to minimise service impacts. Where standalone live testing is required, we have worked to avoid dates and times which would be the most disruptive to Parties use of DCC Live Systems.
- 19. We have scheduled BCDR Tests in three categories:
 - a. Non-Service Impacting BCDR Tests outside of DCC Live Systems (see Appendix One)
 - b. Non-Service Impacting DCC Live System BCDR Tests (see Appendix Two)
 - c. Service Impacting DCC Live System BCDR Tests (see Appendix Three)
- 20. Previous engagement with Parties has indicated that the most significant service impacts are those to prepayment vend and install and commission activity. Appendix two provides detail of the Service impacts for each test event.
- 21. To keep overall service impact to a minimum, some live tests have been scheduled to complete during other planned activities where that other activity impacts Service provision. In these scenarios we have do not consider BCDR Test to be the cause of the Service impact and there for record service impact cause by the test as zero. Parties are informed separately about those other activities and the disruption to Services they cause.
- 22. In total we have scheduled 17 BCDR Tests across nine Service Providers. Of these 11 BCDR Tests will not result in additional disruption of Services. Six of these tests will impact the provision of Services with a total of 42 Hours across the 12-month calendar. The 2026 - 2027 schedule includes tests for two new, additional, Service Providers for this year but we have been able to reduce the overall outage compared to the planed 88 hours for the 2025 – 2026 schedule.
- 23. We aim to ensure that any live tests pose as little disruption as possible for Parties and consumers. Parties have informed us that tests completed during the day on Sundays pose additional disruption

compared to test event overnight time periods. We have worked to keep Sunday daytime tests to a minimum but to ensure quality of testing we have proposed that one Service Provider complete a Sunday daytime test in this test schedule. We will continue to work with Service Providers and keep away from service impacting daytime tests wherever possible.

24. Our standard test window is six hours, but where circumstances require, we have indicated eight-hour windows. This additional time is required to protect data and DCC Services, where previous tests have highlighted complexed issues, or to allow new services additional time in which any unforeseen issues can be resolved.
25. We have also planned our tests to limit the impact on the provision of Services during winter months where adverse weather events are more likely. We have no tests scheduled from 15th July 2026 and 3rd March 2027.

Question Two

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

4. Next Steps

4.1. BCDR Test Schedule next steps

26. This consultation will close at 17:00 on Friday 5th December 2025, following which DCC will review responses and consider if changes to the schedule are required.
27. In November 2025 we will present the draft annual outage plan (combined BCDR Tests and Maintenance activity) to the SEC Operations Subcommittee to gather additional feedback on outage planned from April 2026 to March 2027.
28. In early 2026, following consultation closure and any further engagement with Parties, DCC will provide notice of the finalised BCDR Test Schedule to all SEC Parties. This will be issued at least 60 working days' before the first scheduled test.
29. Live BCDR Test events causing service disruption will also be detailed on the annual outage plan available on the DCC SharePoint.
30. We continue to work with Parties in the development of SEC MP289. This includes the formalisation of our BCDR Test Approach Document and the consideration of notification requirements for those BCDR Tests that do not impact the provision of Services.

5. How to Respond

31. Please provide responses by 17:00 on Friday 5th December 2025 to DCC at consultations@smartdcc.co.uk.
32. 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 (The Department) and the Gas and Electricity Markets Authority (the Authority). Information provided to The Department 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 The

Department 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.

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

6. Appendix One – Non-Service Impacting BCDR Tests Outside of DCC Live System - April 2026 to March 2027

The following table provides details of our plans for completing BCDR Tests outside of the DCC Live System. These tests may be conducted during normal office hours, but they **will not** result in disruption of Services. This approach has been established utilising the methodology set out in our BCDR Test Approach Document.

Service Provider (Service)	Timing
Accenture (ECoS)	Quarter 2 2026
Vodafone (4G CSP)	Quarter 3 2026
VMo2 (CSP C&S)	Quarter 3 2026
Toshiba (4G)	Quarter 4 2026
CGI (DSP)	Quarter 4 2026
Capgemini (DCO)	Quarter 1 2027
CGI SIE (IOC S1SP)	Quarter 1 2027

7. Appendix Two – Non-Service Impacting DCC Live System BCDR Test Schedule - April 2026 to March 2027

The following table provides details of our plans for completing BCDR Tests on DCC Live Systems where there is **no impact** to core Services or the sending and receiving of Service Requests. These BCDR Tests have been established utilising the methodology set out in our BCDR Test Approach Document.

To reduce overall service impact, some of these test activities have been combined with other Service impacting activity where we consider that other activity to be the primary source of the Service disruption. Parties are informed separately about those other activities and the disruption to Services they cause.

Service Provider (Service)	Combined with other activity	Date and time period	Test description
Accenture (4G Device Manager)**	Yes	Tuesday 26th May 2026 20:00 – 02:00 (6 hours)	Failback
BT (SMKI)*	No	Thursday 4th June 2026 20:00 – 02:00 (6 hours)	Failover (new Service)
BT (SMKI)*	No	Thursday 11th June 2026 20:00 – 02:00 (6 hours)	Failback (new Service)
Capgemini (FSM)	No	Tuesday 16th July 2026 20:00 – 02:00 (6 hours)	Resilience testing
Capgemini (DCO)**	No	Thursday 11th March 2027 20:00 02:00 (6 Hours)	Resilience testing

*During the BT (SMKI) BCDR Test SMKI Internet Portal and SMKI Portal will not be available for the duration of the test.

**DCO may be removed based on March 2026 testing, though this test is not combined with other activity, no outage is anticipated when completing this test.

8. Appendix Three – Service Impacting DCC Live System BCDR Test Schedule - April 2026 to March 2027

The following table provides details of our plans for completing BCDR Tests on DCC Live Systems where their execution **will** result in the disruption of Services. These BCDR Tests have been established utilising the methodology set out in our BCDR Test Approach Document.

Some DCC Live System BCDR Tests cannot be combined with other activity. The table below details where those impacts on the provision of Services and we have focused on the impact to pre-payment vend, Install and Commission activity and power outage Alerts, since these have been highlighted as the most significant by our customers.

Service Provider (Service)	Date and time period	Test description	Key service impact area (region or SMETS1 cohort)**				
			SMETS1 / SMETS2 / Both	Pre-Payment	Install and Commission	Power Outage Alerts	Hours of Service impact*
Secure (MOC S1SP)	Saturday 11th April 2026 20:00 – 02:00 (6 hours)	Failback	SMETS1	MOC	Not applicable	Not applicable	6
Arqiva (CSP N)	Sunday 19th April 2026 0900 – 1700 (8 hours)	Failover	SMETS2	CSP N	CSP N	CSP N	8
Arqiva (CSP N)	Sunday 26th April 2026 09:00 – 17:00 (8 hours)	Failback	SMETS2	CSP N	CSP N	CSP N	8
Accenture (4G Device Manager)**	Thursday 21st May 2026 20:00 – 04:00 (8 hours)	Failover	SMETS2	Not applicable	Not applicable	4G CH	8
Secure (MOC S1SP)	Saturday 6th June 2026 20:00 – 02:00 (6 hours)	Failover	SMETS1	MOC	Not applicable	Not applicable	6
CGI (FOC)***	Thursday 4th March 2027 20:00 – 02:00 (6 hours)	Failover and failback	SMETS1	FOC	Not applicable	Not applicable	6

*Details the service impact of BCDR Testing where that service is not expected to be available (prepayment vend and install and commission activity).

**During the Accenture (4G Device Manager) BCDR Test, AD1 and Over The Air Firmware update will not be available.

***Test planned for post go-live test of new service provision, subject to date change.