

DCC Consultation on BCDR Test Schedule

Proposed Amendment to the
April 2026 – March 2027
BCDR Test Schedule

Version: 1.0

Date: 2 March 2026

Closure Date: 24 March 2026

Author: consultations@smartdcc.co.uk

Classification: DCC Public

Contents

1. Executive Summary	3
2. Background.....	4
2.1. The need for BCDR Tests and Exercises	4
2.2. Approach and improvements over time	4
3. Consultation Proposals	5
3.1. BCDR Test schedule 1 April 2026 – 31 March 2027	5
4. Next Steps.....	6
4.1. BCDR Test Schedule next steps.....	6
5. How to Respond.....	6
6. Appendix One – Non-Service Impacting BCDR Tests Outside of DCC Live System - April 2026 to March 2027....	7
7. Appendix Two – Non-Service Impacting DCC Live System BCDR Test Schedule - April 2026 to March 2027	8
8. Appendix Three – Service Impacting DCC Live System BCDR Test Schedule - April 2026 to March 2027	9

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. In December 2025 we published our annual consultation¹ on proposed test dates scheduled between April 2026 and March 2027, and in February 2026 we published our conclusions and BCDR Test Schedule².
3. BCDR Tests are 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 scheduled 18 BCDR Tests across nine Service Providers. Of those 11 BCDR Tests will not result in additional disruption of Services. Seven 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. We are now consulting on an amendment to that schedule as we have become aware that one of the non-service impacting, non-live system tests, should be amended to be service impacting. This proposed change ensures that we are testing in line with our published test approach, which allows for a risk-based decision on the types of test each Service Provider should perform, and will provide confidence in BCDR procedures.
6. Parties are invited to respond to the consultation by 17:00 on 24 March 2026 to DCC at consultations@smartdcc.co.uk.

¹ [DCC Consultation on BCDR Tests | Smart DCC](#)

² [BCDR Test schedule April 2026 - March 2027 | Smart DCC](#)

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. As part of our approach, we schedule non-system impacting tests which can include desk-based testing where procedures and "run books" are evaluated but live systems are not actively tested. These types of test are only deemed appropriate where there is recent activity that has proven our BCDR capability and where we have high confidence in that capability.
16. Other tests are conducted on live systems where BCDR procedures are deployed, and these tests do impact service availability. Where appropriate we run these tests in parallel with other system

¹ SEC Appendix AG - Incident Management Policy

² BCDR Engagement - Smart Energy Code

impacting activity, such as Planned Maintenance, in order to reduce overall system downtime to a minimum.

3. Consultation Proposals

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

17. Since concluding our December BCDR Test Schedule consultation and providing Parties with the April 2026 – March 2027 test schedule, we have become aware of changes in testing requirements for our Service Provider for the Initial Operating Capacity (IOC) cohort of SMETS1 meters.
18. These changes relate to the resolution of an ongoing non-performance impacting issue, following which the IOC Service Provider has recommended that the system enhancements should be validated in a live-system BCDR Test. In addition to this, technical changes were made to the S1SP IOC solution that now require validation via a live BCDR Test.
19. Following a risk-based assessment, we consider that the change is significant enough for us to reconsider our approach to this Service Provider's BCDR Test in the published schedule, which had previously been planned as a Non-Service Impacting BCDR Tests outside of DCC Live System, in quarter one, 2027.
20. We now propose that the BCDR Test for this Service Provider be a live-system test to fully re-prove our BCDR capability, and that the test date be brought forward. Completing a live BCDR Test follows the principles detailed in our BCDR Test Approach Document and will provide confidence that BCDR procedures can be deployed in a real-world outage or any disruption affecting DCC Services.
21. We have worked with the Service Provider to agree a test date that allows for BCDR procedures to be tested while minimising the impact of service disruption as much as possible. However, we do recognise that any outage can cause disruption to DCC customers and consumers.
22. 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)
23. The proposed changes are shown in tracked changes within Appendix One where one test has been removed, and Appendix Three where a test has been added.

Question One

Do you agree with our rationale for amending this type of BCDR Test, and support the execution of the test as noted in the amended schedule? Please provide rationale for your response.

Question Two

Do you have any additional comments?

4. Next Steps

4.1. BCDR Test Schedule next steps

24. This consultation will close at 17:00 on 24 March 2026, following which DCC will review responses and consider if any amendments to the proposal are required.
25. We will engage with SEC Operations Sub-Committee to provide an updated annual outage plan (combined BCDR Tests and Maintenance activity) and gather additional feedback. We will confirm the amended schedule as soon as possible following consultation closure.
26. Live BCDR Test events causing service disruption will also be detailed on the annual outage plan available on the DCC SharePoint.
27. 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

28. Please provide responses by 17:00 on 24 March 2026 to DCC at consultations@smartdcc.co.uk.
29. 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.
30. 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 SMIKI 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
Accenture (4G Device Manager)**	Thursday 21st May 2026 20:00 – 04:00 (8 hours)	Failover	SMETS2	Not applicable	Not applicable	4G CH	8
Arqiva (CSP N)	Sunday 2nd August 2026 0900 – 1700 (8 hours)	Failover	SMETS2	CSP N	CSP N	CSP N	8
Arqiva (CSP N)	Sunday 9th August 2026 09:00 – 17:00 (8 hours)	Failback	SMETS2	CSP N	CSP N	CSP N	8
Secure (MOC S1SP)	Saturday 6th June 2026 20:00 – 02:00 (6 hours)	Failover	SMETS1	MOC	Not applicable	Not applicable	6
<u>CGI SIE (IOC S1SP)</u>	<u>Sunday 20th September 2026</u> <u>20:00 – 02:00 (6 hours)</u>	<u>Failover and failback</u>	<u>SMETS1</u>	<u>IOC</u>	<u>Not applicable</u>	<u>Not applicable</u>	<u>6</u>

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*
CGI (FOC)**	Saturday 6th March 2027 20:00 – 02:00 (6 hours)	Failover and failback	SMETS1	FOC	Not applicable	Not applicable	6

*Details the duration of the BCDR Testing window 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.