

# Conclusion on the Business Continuity and Disaster Recovery Tests

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**Classification:** DCC Public



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# Table of Contents

- 1 Introduction and Context.....3**
- 2 DCC Response to Comments Received.....3**
  - 2.1 General Comments .....3
  - 2.2 Question 1.....3
  - 2.3 Question 2.....5
  - 2.4 Question 3.....5
- 3 Next Steps.....6**
  - 3.1 Key steps .....7
  - 3.2 Post-test reporting and actions.....7

# 1 Introduction and Context

Section H10.11 of the SEC places an obligation on DCC to periodically test its Business Continuity and Disaster Recovery (BCDR) arrangements and report the results to the SEC Panel and the Authority. In accordance with the obligations set out in Section H10.12A of the SEC, DCC is required to consult the Parties and the Technical Architecture and Business Architecture Sub-Committee (TABASC) regarding the timing and approach of testing the DR infrastructure.

The purpose of the proposed BCDR test is to validate that the secondary systems are capable of providing continuity of both SMETS2 and SMETS1 services. This includes testing all the SMETS1 infrastructure changes introduced into live since the last test that occurred in May 2019, prior to SMETS1 go-live. DCC considers that the optimum time to undertake this proving test is November 2019; before the anticipated ramp-up of live and active migration services, for the following reasons:

- the increasing impact of new SMETS1 installations, plus existing SMETS1 meters that are gradually being incorporated into the DCC ecosystem; and
- November is expected to be outside the peak winter storm season, reducing the impact on Distribution Network Operators (DNOs).

DCC consulted on its ability to continue providing the Services in the event that any aspect DCC Systems fails (Disaster Recovery). The consultation ran from 24 July to 5 August 2019 and this response document sets out DCC's conclusions in response to the comments that were received from industry.

## 2 DCC Response to Comments Received

DCC received four responses to the consultation, which provided a variety of feedback which DCC will address in this consultation response.

DCC posed three questions which are set out below along with comments and the DCC response to the comments.

### 2.1 General Comments

**DCC did not receive any general comments that need to be addressed:**

### 2.2 Question 1

**Q1**

*Do you agree with DCC's proposal to undertake DR testing in November 2019? If you disagree, please provide your reasons.*

**The comments received to the above question and DCC response is set out below:**

#### **Comment:**

Concerns were raised about the need to stop firmware downloads four days prior to a failover/failback. This has a consequential impact on the ability to ensure that assets are on a compliant firmware version.

#### **Response:**

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This is part of the Over the Air (OTA) process and all OTA upgrades will be stopped during the dates of the Disaster Recovery (DR) exercise. However, the DR exercise occurs on Sunday, therefore firmware upgrades can be submitted on Monday to Wednesday prior to the date, which should not be impacted if the Service Level Agreement (SLA) is fully compliant. The reason for the request not to submit firmware upgrades is that there is a risk that these will not be carried out due to the DR test and suppliers will accordingly be required to resubmit these requests.

DCC are giving 60 working days notice of the DR testing which should allow suppliers sufficient time to plan their firmware upgrade schedules.

**Comment:**

A concern was raised that the BCDR testing would conflict with the November release.

**Response:**

The November release and the BCDR testing will both be managed to reduce conflicts and should not impact each other. DCC will ensure that this will be taken into account in the planning for each activity.

**Comment:**

A respondent sought an explanation as to why all SMETS1 services were not being tested.

**Response:**

All new SMETS1 infrastructure is being resilience-tested. However, the DSP infrastructure already exists and is being added to for SMETS1. It is therefore necessary to test this separately as it is part of the business-as-usual infrastructure.

**Comment:**

A respondent sought to understand DCC's approach if the DSP failover / failback is not 100% successful, including the recourse to ensure BCDR tests do not fail again.

**Response:**

DCC is undergoing significant preparation in the lead up to the BCDR tests to mitigate the danger of the failover/failback not being 100 percent successful. DCC will work closely with DSP to review their runbook steps, and their pre failover health checks to ensure all participants have a high level of confidence that as much preparation as possible has been done. DCC also runs a bridge, that allows updates to be regularly provided which informs decision making and progress to be tracked.

**Comment:**

An explanation was sought as to what further testing would be undertaken for BCDR relating to the Middle Operating Capability (MOC) and Final Operating Capability (FOC).

**Response:**

We are currently working with MOC Service Providers to identify our approach for pre and post go-live testing and the format of this will become clear over the next month or two.

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FOC will be using the same components as IOC and therefore the approach adopted in IOC which is an active/active solution offering and DCC will apply the same testing regime as carried out for IOC.

## 2.3 Question 2

**Q2**

*Do you agree with DCC's proposal to undertake DR testing during Sundays 09:00 – 13:00, with additional contingency between 13:00 – 17:00? If you disagree, please provide your reasons.*

**The comments received were supportive of these time periods:**

## 2.4 Question 3

**Q3**

*Please provide any suggestions which you consider may help to minimise disruption to the provision of the Services during the proving test.*

**The comments received to the above question and DCC response is set out below:**

**Comment:**

A concern was raised that DCC is not truly testing DR capability as suppliers are requested to cease work leading up to the outage.

**Response:**

The SEC places an obligation on DCC to publish a schedule of proposed BCDR testing, this provides a warning to Parties that the testing will be carried out and will impact DCC Systems. The request to cease working is for the benefit of suppliers so that they do not waste time and resources during a period when DCC is aware that requests will not be carried out as the DCC Systems will not be operational.

**Comment:**

A respondent sought to understand whether DCC can minimise this disruption and eliminate the need for suppliers to suspend firmware activities leading up to the testing.

**Response:**

These tests are good industry practice and are also a regulatory obligation with which DCC must comply. DCC has sought to minimise the impact of these tests as much as possible.

**Comment:**

A respondent sought an undertaking to extend applicability of firmware versions.

**Response:**

Appendix 11, the TS applicability tables have been determined by BEIS and it is not within the ability of DCC to amend these tables. DCC notes that there should not be an impact on the firmware versions during this period.

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**Comment:**

A respondent requested DCC consider doing the BCDR testing in the freeze period.

**Response:**

DCC is of the view that it would not be practical to carry out the BCDR tests during this period for the following reasons:

- This period ensures that resources are not constrained on key activities and BCDR exercises arranged during this period would add extra dimension to the test; and
- The change freeze also implies the approaching holiday season and it would be difficult to gain support for the BCDR exercise during this period.

**Comment:**

A respondent considered that as SMETS2 pay-as-you-go (PAYG) installations are likely to have taken place ahead of the proposed November BCDR dates, that it would be beneficial to understand DCC assumptions it has made in this area.

**Response:**

DCC is of the opinion that SMETS2 PAYG devices will not be impacted as any requests related to these devices will not be lost.

**Comment:**

A respondent sought clarification from DCC confirming its approach, should issues be identified with the Disaster Recovery secondary solutions in the week between the failover and fallback outages.

**Response:**

DCC would handle this as business-as-usual work following the normal procedures. The secondary site would operate as the primary site during that week and would be treated as such.

**Comment:**

A respondent sought to understand DCC's communications plan for the BCDR period.

**Response:**

The planning sessions and approach will ensure that appropriate communications are issued, prior to the start of the BCDR tests. During the exercise and once completed, communications will be issued and confirmation will be provided when systems are available.

### **3 Next Steps**

DCC will be carrying out the BCDR testing in line with the dates set out in the consultation as follows:

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## 3.1 Key steps

**Sunday 3 November:** The Data Service Provider (DSP) will failover from the primary systems to the secondary systems.

**Sunday 3 November - Saturday 9 November:** Services will be provided using the secondary DSP systems for 1 week, with the two Communication Service Providers (CSPs) and the Trusted Service Provider (TSP) continuing to run on their primary systems. This is intended to allow Users to assess and measure the performance of the secondary DSP system, and notify DCC of any issues they might encounter.

**Sunday 10 November:** The DSP will failback from its secondary systems to its primary systems.

**Sunday 17 & 24 November:** This contingency window will only be used if there is a problem with any of the failover/failback tests that results in an activity being cancelled or postponed. If no problems are experienced during the failover/failback tests, the contingency will be cancelled, and the Services will be made available on this date. We anticipate notifying Parties if this contingency is to be used or not by 10 November (following the 10 November failback).

## 3.2 Post-test reporting and actions

On completion of the proving test, DSP will be responsible for conducting their own post-test reviews and will be required to submit reports to DCC. DCC will carry out assurance checks to verify DSP's performance and identify any further areas for improvement. Once this assurance review is complete DCC will prepare its report for provision to the SEC Panel in accordance with Section H10.11(b).

Any residual post-test actions identified during the proving test or following DCC's assurance work will be documented and tracked to completion.