

# Conclusion on the 2022 BCDR Testing Schedule

Consultation on DCC 2022 Business  
Continuity and Disaster Recovery  
Testing Schedule

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# 1. Background

Section H10.11 of the Smart Energy Code (SEC) places an obligation on DCC to periodically test the Business Continuity and Disaster Recovery (BCDR) arrangements in order to assess whether the BCDR procedures remain suitable for achieving the objectives described in Section H10.9 and report the results to the SEC Panel.

On 8<sup>th</sup> November 2021 DCC issued a consultation to seek the views of SEC Parties and presented the proposed plan to SEC Operations Group on the 7<sup>th</sup> December. The consultation was issued in accordance with Section H10.12A of the SEC. The scope of the consultation was limited to proving DCC's ability to maintain continuity of services throughout the 2022 calendar year. The purpose of BCDR testing is to verify that the secondary systems can provide continuity of DCC services to Customers and Service Users.

The scope of 2022 BCDR testing is to prove the following:

- That each DCC 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 all services in respect of SMETS2 and SMETS1 services.
- That all DCC Service Providers and DCC Service 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.
- In respect of SMETS1, that the DCC Migration Control Centre can continue to operate and carry out migrations when SMETS1 Service Providers are operating from the secondary site.
- That DCC Core Services are restored at levels that meet stakeholder, customer, and regulatory obligations.
- That the BCDR plan is tested to maintain an effective continuity capability that is aligned to SEC obligations.
- That DCC Service Providers can demonstrate their BCDR capability by testing their recovery processes, enabling DCC to demonstrate successful and resilient secondary site operations across the ecosystem.

# 2. DCC Responses to Comments Received

DCC received four responses to the consultation which all provided similar feedback. Three responses were from Large Supplier Parties and one response from a Network Party. DCC also invited views from SEC Operations Group on the 7<sup>th</sup> December where similar comments were received. DCC posed four questions in the consultation which are set out below, along with comments received and DCC's response to those comments.

## Question 1

Do you agree with DCC's proposal to undertake Disaster Recovery proving as detailed in Annex Two and that updates to these dates should be shared with Service Users in advance of the test dates? If you disagree, please provide your rationale.

This question related to the 2022 test schedule and the planned continued communication throughout the 2022 calendar year to confirm testing dates.

**Comments:** Three respondents agreed with the proposed testing schedule and noted the reduced downtime for BCDR testing from the 2021 schedule where simultaneous testing had been implemented. Respondents also noted the importance of early communication when the schedule changes. One respondent disagreed with the schedule due to the volume of down time and asked that testing be considered with maintenance activity.

**Response:** DCC welcomes the agreement of testing schedule by most respondents and will continue to work with industry to communicate and confirm testing dates through 2022. DCC has worked to reduce the downtime of BCDR testing, working internally and with multiple Service Providers to combine testing where it is effective and appropriate to do so. DCC does not consider that it is appropriate to combine maintenance releases and BCDR testing since this would present a significant risk to services where new code is released in conjunction with BCDR activity. DCC notes that while these activities do result in system downtime and disruption for users, they are required to ensure systems remain fit for purpose and to ensure real life BCDR activity can be completed successfully. DCC will continue to work to reduce system downtime where appropriate.

## Question 2

Do you agree with DCC's proposal to undertake DR testing during Sundays 09:00 – 17:00. This covers the 4 hours expected Recovery Time Objective (RTO) and 4 hours contingency? If you disagree, please provide your rationale.

This question related to the timing of Disaster Recovery (DR) testing on Sundays, which allows the RTO to be met while also providing contingency.

**Comments:** Three respondents noted that the required DR testing will always impact services and that there is never a perfect time for these events. One of these respondents noted Sundays as the most appropriate time, and two of these respondents requested that DCC continue to investigate the possibility of reducing downtime in the future. One respondent disagreed with the timing highlighting impact to services and suggested other windows they consider to be less impactful.

**Response:** DCC has worked internally with stakeholders and with multiple Service Providers to agree the optimal time to run the 2022 BCDR schedule with as little system downtime as possible, balancing that desire to combine testing to cause minimal disruption to Users. DCC considers the 2022 schedule to be the most appropriate compromise and will continue to work to reduce future downtime. DCC has worked with multiple Service Providers to produce the most efficient

schedule of testing and considers that the current schedule offers the most appropriate balance of downtime and the number and timing of testing windows.

### Question 3

Do you agree with DCC's proposal to implement a 2-hour validation checks (usually 17:00 – 19:00) after the closure of each testing window to ensure all issues have been captured, managed, and controlled to avoid further downtimes being caused by incidents due to the BCDR testing activity? If you disagree, please provide your reasons.

The question related to DCC's proposal to complete a validation check process following any BCDR testing to provide additional certainty that the test had been completed successfully.

**Comment:** Three respondents were in agreement for the implementation of a 2-hour validation check following each BCDR test. Two respondents asked for further clarity on the impact and planning of these validation checks.

**Response:** The 2-hour validation check will not result in additional system downtime but will provide certainty that the BCDR test has completed successfully or allow DCC to take remedial action where issues arise. The 2-hour period of the validation check has been established from previous validation exercises and lessons learnt and is considered a reasonable time period in which to complete this activity.

### Question 4

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

**Comment:** One respondent asked if prepayment services could be kept live during BCDR testing to limit the impact on these customers, or if the down time for these services could be shorter than the full test. One respondent noted the simultaneous testing planned for 2022 but challenged DCC to further reduce BCDR testing down time. One respondent questioned whether BCDR testing could be combined with other maintenance.

**Response:** DCC systems do not allow prepayment services to be excluded from BCDR testing and so the suggestion that prepayment services can be made available earlier or not be included in the overall testing is not technically feasible. Working with multiple Service Providers, DCC considers positive steps have been made to run simultaneous tests in the 2022 schedule and will continue to take this approach for future testing arrangements and limit overall system downtime. To protect service, DCC does not consider it appropriate to run maintenance releases and BCDR activity simultaneously. DCC will continue to work to reduce downtime associated with BCDR activity and limit the impact on users.

## 3. Next Steps

DCC will continue to engage with industry and confirm testing dates as the schedule is progressed through 2022. Where any changes to the testing schedule are required, DCC will look to combine BCDR activities wherever possible.

Annex 1 sets out the current BCDR Test Schedule and should be taken as formal notification of the 2022 schedule.

## 4. Annex 1 - Business Continuity and Disaster Recovery Test Schedule

The below BCDR test schedule shows all planned outages to services during 2022.

Date	SMETS BCDR Proving Activity	Outage Window 4 Hours Recovery Time Objective 4 hours Contingency
10 April 2022	DSP – DR Failover	09:00 – 17:00
24 April 2022	DSP – DR Failback	09:00 – 17:00
08 May 2022	DSP – DR Contingency	09:00 – 17:00
15 May 2022	CSP SC - DR Failover CSP N – DR Failover	09:00 – 17:00
22 May 2022	CSP SC - DR Failback CSP N – DR Failback	09:00 – 17:00
29 May 2022	CSP SC - DR Contingency CSP N – DR Contingency	09:00 – 17:00
29 May 2022	CSP SC - DR Contingency CSP N – DR Contingency	09:00 – 17:00
07 July 2022	TSP (BT) – DR Failover	20:00 – 04:00
14 July 2022	TSP (BT) – DR Failback	20:00 – 04:00
21 July 2022	TSP (BT) – DR Contingency	20:00 – 04:00
06 Aug 2021	Secure Meters – DR Failover	20:00 – 04:00
04 Sept 2022	CP – DR Failover DCO – Resilience & SFTP Testing	09:00 – 17:00
11 Sept 2022	CP – DR Failback DCO – Resilience & SFTP Contingency	09:00 – 17:00
18 Sept 2022	CP – DR Contingency	09:00 – 17:00
24 Sept 2021	Secure Meters – DR Failback	20:00 – 04:00
01 Oct 2022	Secure Meters – DR Contingency	20:00 – 04:00
09 Oct 2022	DXC/Trilliant – Resilience & SFTP DR Failover SIE – Resilience & SFTP Failover/Failback	09:00 – 17:00
16 Oct 2022	DXC/Trilliant – Resilience & SFTP DR Failback SIE – Resilience & SFTP Contingency	09:00 – 17:00
23 Oct 2022	DXC/Trilliant – Resilience & DR Contingency	09:00 – 17:00

