

# Conclusion to DCC Consultation on BCDR Test Schedule

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

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## Contents

<b>1. Executive Summary .....</b>	<b>3</b>
<b>2. Background.....</b>	<b>4</b>
<b>2.1. The need for BCDR Tests and Exercises .....</b>	<b>4</b>
<b>2.2. Approach and improvements over time.....</b>	<b>4</b>
<b>3. Consultation Proposals and Responses.....</b>	<b>5</b>
<b>3.1. BCDR Test schedule 1 April 2026 – 31 March 2027 .....</b>	<b>5</b>
<b>3.2. Consultation feedback .....</b>	<b>5</b>
<b>4. Consultation Conclusions .....</b>	<b>7</b>
<b>5. Appendix One – Non-Service Impacting BCDR Tests Outside of DCC Live System - April 2026 to March 2027....</b>	<b>8</b>
<b>6. Appendix Two – Non-Service Impacting DCC Live System BCDR Test Schedule - April 2026 to March 2027 .....</b>	<b>9</b>
<b>7. Appendix Three – Service Impacting DCC Live System BCDR Test Schedule - April 2026 to March 2027 .....</b>	<b>10</b>

# 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 consultation<sup>1</sup> on proposed test dates scheduled between April 2026 and March 2027, and in February 2026 we published our conclusions and BCDR Test Schedule<sup>2</sup>.
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 planed 88 hours for the 2025 – 2026 schedule.
5. In March 2026 we consulted<sup>3</sup> on an amendment to that schedule after we became aware that one of the non-service impacting, non-live system tests, should be amended to be service impacting. The proposed change would ensure that we are testing in line with our published test approach, which allows for a risk-based decision on the category of test each Service Provider should perform, and will provide confidence in BCDR procedures.
6. The consultation closed 24<sup>th</sup> March and we received two responses. This document takes into account stakeholder responses and concludes the outcome of that consultation, which is to implement the BCDR schedule changes as proposed.

<sup>1</sup> [DCC Consultation on BCDR Tests | Smart DCC](#)

<sup>2</sup> [BCDR Test schedule April 2026 – March 2027 | Smart DCC](#)

<sup>3</sup> [Proposed Amendment to the April 2026 – March 2027 BCDR Test Schedule | 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.<sup>1</sup> 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. 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. 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 tests are only deemed appropriate where there is recent activity that has proven our BCDR capability and where we have high confidence in that capability.
14. 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 impacting activity, such as Planned Maintenance, in order to reduce overall system downtime to a minimum.

<sup>1</sup> [SEC Appendix AG - Incident Management Policy](#)

### 3. Consultation Proposals and Responses

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

15. Since concluding our December BCDR Test Schedule consultation and providing Parties with the April 2026 – March 2027 test schedule, we became aware of changes in the testing requirements for our Service Provider for the Initial Operating Capacity (IOC) cohort of SMETS1 meters.
16. 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.
17. Following a risk-based assessment, we considered that the technical 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.
18. In our consultation we proposed that the BCDR Test for this Service Provider be changed to a live-system test to fully re-prove our BCDR capability. We proposed that the non-system impacting test in quarter one 2027 be cancelled and an additional live test be scheduled for Sunday 20<sup>th</sup> September 2026.
19. We consider that this test date has provided sufficient time to consult with Parties and to provide them with substantial notice period, beyond the SEC minimum, of the amended test schedule.

#### 3.2. Consultation feedback

20. The consultation closed 24<sup>th</sup> March 2026 and we received two responses, one from a Supplier Party and one from SEC Panel.

##### 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.

21. Question one asked if Parties agreed with the reasoning for the change in the type of BCDR test scheduled and supported the execution of the test in September 2026. We received two answers to this question.
22. One response supported the reclassification and the proposed test date and noted that the system updates described in the consultation would require a change in testing approach to maintain confidence in BCDR capability for the service. They noted that the updated BCDR Test schedule provided clear transparency and that they expected minimal customer impact from the test.
23. DCC welcomes the support provided by this Party for the amendment to the BCDR Test schedule as described.
24. A second response raised concerns with an amendment to the BCDR Test schedule so soon following its original notification to Parties, noting that this introduces uncertainty for SEC Parties and increases their planning burden. The respondent requested that DCC ensure sufficient assurance is completed for future BCDR test schedules before their publication.

25. We recognise that amendment to the schedule may require additional planning for Parties. In organising the annual BCDR Test schedule, where BCDR Tests need to be planned around or in parallel with other sources of outage, DCC begins its planning 9 months in advance of the regulatory year. In addition, our final notification which must, under SEC obligations, provide at least 60 working days notice of any test.
26. This lead time means that planning can begin up to 18 months before a test is scheduled to be executed. While we work to ensure that appropriate assessment of the required test type is completed there may be times where a test type may need to be amended to ensure that BCDR capabilities are fully proven and that they can be utilised in the event of a real-world disaster.
27. While we work to ensure clarity in our BCDR Test schedule, we also recognise that resilience capability is not static and our approach to assurance must adapt as services and systems evolve. In this instance, amendments to the Service Provider systems were not known at the time the original BCDR Test schedule was proposed. Once these changes were identified, and the resulting need to amend the test category became clear, we consulted at the earliest opportunity in order to provide as much notice as possible of the amendment.
28. We will consider if changes can be implemented to better protect any published schedule in the future. However, we consider that it is in the best interest of Parties and consumers to amend a test type following the notification of a the BCDR Test schedule, where confidence in BCDR procedures has reduced post issue of the BCDR Test schedule.

## Question Two

Do you have any additional comments?

29. This question asked if Parties had any other comments.
30. One respondent welcomed the transparency provided in the consultation and early engagement describing the amendment which they considered would help Parties plan effectively. They continued to provide their support for robust BCDR assurance following system changes and the tracking of amendments to test classification. They requested that DCC continue to schedule service impacting tests in a manner that minimises Service disruption and the continued provision of clear information.
31. Another response noted the expectation for DCC to communicate the rationale for the change, the timing of the amended test and its impact to Parties, with sufficient advanced notice that Parties are able to plan appropriately.
32. We provided our rationale for amending the test in our original consultation and have repeated that in this document. For clarity, we have proposed amending the BCDR Test type following technical changes to the Service Provider's solution which has resulted in a need for a live-system test to confirm that BCDR procedures will function with those amendments. The BCDR Test Schedule provides details of the impact of each individual Service impacting test, and the date and timing of each BCDR Test, to allow Parties to plan accordingly.

## 4. Consultation Conclusions

33. Given the changes made to the Service Providers systems we consider that a live BCDR test should be completed to provide assurance that the BCDR procedures remain fit for purpose, and that they can ensure continuity of Service in the event of a real-world disaster.
34. We have not received opposition to the proposals and therefore confirm that the changes proposed are now incorporated into the new BCDR Test Schedule. The updated schedule is provided in appendix one, two and three.
35. Should any further changes be required we will engage as quickly as possible to ensure we maintain a transparent and robust process.
36. 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)

## 5. 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

## 6. 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.

## 7. 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
Secure (MOC S1SP)	Saturday 6th June 2026 20:00 – 02:00 (6 hours)	Failover	SMETS1	MOC	Not applicable	Not applicable	6
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
CGI SIE (IOC S1SP)	Sunday 20th September 2026 20:00 – 02:00 (6 hours)	Failover and failback	SMETS1	IOC	Not applicable	Not applicable	6

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.