



DCC Consultation on BCDR Tests

April 2027 – March 2028
BCDR Test Schedule

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Author: consultations@smartdcc.co.uk
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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 2027 and March 2028. 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. Service Impacting DCC Live System BCDR Tests (see Appendix One)
 - b. Non-Service Impacting DCC Live System BCDR Tests (see Appendix Two)
 - c. Non-Service Impacting BCDR Tests outside of DCC Live Systems (see Appendix Three)
4. In total we have scheduled 17 BCDR Test events. Five Service Providers will complete seven live tests, which will result in an aggregate Service disruption for a total of 36 hours. Another four Service Providers will complete live tests but will not disrupt the provision of Services. In addition, six Service Providers will complete testing outside of live systems without Service disruption.
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 Wednesday 18th November 2026 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 event 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 in the event of a disaster.
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 to BCDR Tests

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. DCC has worked with Parties to describe our BCDR Test Approach Document² which was formalised in June 2026 through the implementation of SEC MP289³. Readers are encouraged to review the approach document to gain insight in to how we currently plan, risk assess and schedule BCDR Tests; we do not repeat the content of the approach document here.
14. There are broadly two types of tests described in the BCDR Test Approach Document, that is those tests that will impact the provision of Services during their execution and those that will not impact the provision of Services. Those tests that do not impact Service provision may be completed through DCC Live System tests or outside of the DCC Live System. SEC MP289 also amended the engagement requirements related to BCDR Tests to allow that communication to focus on those tests that will impact the provision of Services and provide for more flexibility for those tests that will not impact the provision of Services.
15. We continue to implement the lessons from previous years, including our approach to scheduling BCDR Tests which continue to keep overall Service disruption to a minimum.

¹ SEC Appendix AG - Incident Management Policy

² [business-continuity-and-disaster-recover-test-approach-document-v10.pdf](#)

³ BCDR Engagement - Smart Energy Code

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 for those tests that will impact the provision of Service, covering 1st April 2027 to 31st March 2028, and provides the opportunity for Parties to comment and feedback on the testing schedule.
18. For information we also provide the schedule of non-Service impacting tests.

3. Consultation Proposals

3.1. BCDR Test schedule 1st April 2027 – 31st March 2028

19. We utilise the principles 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.
20. DCC is working to understand incidents where system resilience capabilities may not have effectively resolved Service impacting issues as designed, and how this resilience can be effectively tested. Once this review and consideration is completed, we will make any appropriate amendments to the BCDR Test Approach Document, and our future testing plans.
21. We have scheduled BCDR Tests in three categories:
 - a. Service Impacting DCC Live System BCDR Tests (see Appendix One)
 - b. Non-Service Impacting DCC Live System BCDR Tests (see Appendix Two)
 - c. Non-Service Impacting BCDR Tests outside of DCC Live Systems (see Appendix Three)
22. We consider that it is the Service impacting DCC Live System BCDR Tests that will be of the most interest to our customers. Other tests will not result in any additional disruption to the Services we provide.
23. Previous engagement with Parties has indicated that the most significant Service impacts are those to prepayment vend and install and commission activity. Appendix one provides details of the Service impacts for each Service impacting test event.
24. 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 the BCDR Test to be the cause of the Service impact and therefore record the Service impact caused by the test as zero hours. Parties are informed separately about those other activities and the disruption to Services they cause.
25. In total we have scheduled 17 BCDR Test events. Of these five Service Providers will complete seven live tests which will disrupt Services for a total of 36 hours. Another four live tests will be completed by four Service Providers but will not disrupt the provision of Services. In addition, 6 Service providers will complete testing outside of live systems without Service disruption.
26. 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 a test event over nighttime 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 year's test schedule.

27. This year we have arranged all our Service impacting tests to remain within our standard test window of six hours, while two Service impacting tests are scheduled to complete in just three hours. Live tests are generally completed overnight with start times aligned to Maintenance windows to provide for standardised Service disruption hours.
28. 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 November 2027 to the end of March.

Question One

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

4. Next Steps

4.1. BCDR Test Schedule next steps

29. This consultation will close at 17:00 on Wednesday 18th November 2026, following which DCC will review responses and consider if changes to the schedule are required.
30. In November 2026 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 2027 to March 2028.
31. In early 2027, 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 Service impacting test.
32. Live BCDR Test events causing Service disruption will also be detailed on the Annual Outage Plan available on the DCC SharePoint and included in our monthly Maintenance communications.

Question Two

Do you have any other comments?

5. How to Respond

33. Please provide responses by 17:00 on Wednesday 18th November 2026 to DCC at consultations@smartdcc.co.uk.
34. 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.

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

6. Appendix One – Service Impacting DCC Live System BCDR Test Schedule - April 2027 to March 2028

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
CGI SIE (IOC S1SP)***	Sunday 11th April 2027 0900 – 1500	Failover & Failback	SMETS1	IOC	Not applicable	Not applicable	6
Accenture (4G Device Manager)**	Saturday 17 th April 2027 20:00 – 02:00	Failover	SMETS2	Not applicable	Not applicable	4G CH	6
Accenture (4G Device Manager)**	Tuesday 20th April 2027 20:00 – 02:00	Failback	SMETS2	Not applicable	Not applicable	4G CH	6
Accenture (ECoS)	Tuesday 7 th September 2027 20:00 – 02:00	Failover	Both	Not applicable	Not applicable	4G CH	6
Secure (MOC S1SP)	Saturday 25 th September 2027 20:00 – 02:00	Failback	SMETS1	MOC	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
Vodafone (DCC Connect)***	Wednesday 20 th October 2027 20:00 – 23:00	Failover	Both	GB wide	GB wide	GB wide	3
Vodafone (DCC Connect)***	Wednesday 27 th October 2027 20:00 – 23:00	Failback	Both	GB wide	GB wide	GB wide	3

*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.

***These tests are expected to result in minimal to zero Service interruption, the hours-of-Service impact relates to the window in which the test will be completed.

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 (ECoS)	Yes	Tuesday 14 th September 2027 20:00 – 02:00 (6 hours)	Failback
Capgemini (DCO)**	No	Through Planned Maintenance activity	Resilience and component testing
Vodafone (4G CSP)	No	Through Planned Maintenance activity	Resilience and component testing
Secure	No	Prior to Secure (MOC S1SP) live testing in September	Resilience and component testing

8. Appendix Three – Non-Service Impacting BCDR Tests Outside of DCC Live System - April 2027 to March 2028

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. We have not provided dates for these tests since they are not completed on live systems, will not interrupt Services and planned dates may change.

Service Provider (Service)
Arqiva (CSP N)
BT (SMKI)*
VMo2 (CSP C&S)
Toshiba (4G)
CGI (DSP)
CGI (FOC)