

Document / Event	Principle	Customer	Confidential?	Customer feedback	Xoserve response
Draft P&A	Transparency	Centrica	No	<p>Transparency must be made a key principle: Transparency needs to be made a key over-arching principle that underpins BP24 because it has not been given the necessary direct emphasis in the draft P&A that is required.</p> <p>Xoserve proposes to improve transparency by, for example, publishing headcount data, direct costs data and non-confidential feedback received in response to its consultations. We welcome these tangible commitments to increase transparency relative to that in recent business plans. However, Xoserve should recognise that these commitments simply reinstate what was done previously but was discontinued and, in isolation, will not deliver the step-change in transparency that stakeholders have requested.</p> <p>Participants in the 'Roundtable' session discussed why the proposed P&A do not satisfactorily address the need to increase transparency and were keen that transparency be added as an additional or over-arching principle. We fully support the recommendation. Although you recognise the need for BP24 to be 'appropriately transparent', your more recent proposal to make transparency a 'golden thread' is insufficient. Transparency needs to be the fundamental principle upon which BP24 is built. Transparency should influence and be given at least the same level of prominence as the other defined principles (e.g. having a named person responsible for delivering transparency in BP24, as per the other principles). Also, transparency should have at least the same level of influence, if not more, on the development of BP24 as the other defined principles.</p> <p>As you know, we proposed a modification to the Uniform Network Code ('UNC mod 0841') and it currently is being developed in an industry workgroup. The intent of UNC mod 0841 is, among other things, to embed transparency in the CDSP's business planning. We welcome your stated support for the intent of the modification and that you have constructively participated in the workgroup development. Crucially, UNC mod 0841 also includes how the CDSP can achieve the necessary transparency and, as such, addresses concerns that transparency is a subjective and opaque concept.</p> <p>Stakeholders have been explicit during previous business planning cycles about the need for the step-change in transparency. The industry's support for the intent of UNC mod 0841 is further evidence that its preferred direction of travel is clear. As a result, Xoserve should explicitly place delivering the necessary step-change in transparency 'front and centre' for BP24. Making transparency a key principle and delivering transparency according to the 'how' in UNC mod 0841 (ahead of it being formally submitted to the Authority) should enable the CDSP to satisfy stakeholders' need for the step-change in transparency.</p>	<p>We recognise the importance of transparency and we have updated the P&A to reflect this, giving 'transparency' equal parity with the original key principles.</p> <p>The original thinking behind referencing transparency in the 'Accessibility' principle only was to flag that BP24 content would be appropriately transparent. That is still the case, but on reflection, and following feedback at the P&A Roundtable and in your written correspondence, we think that we should go further than referencing transparency at a headline level. So, you will find that in each of the other principles, we have provided commentary as to how we will bring more transparency to each element (e.g. publishing the output from the Efficiency Review to support the VFM principle, or publishing all customer correspondence and Xoserve's response to support Engagement).</p> <p>All of the Xoserve senior leadership team and our Business Plan Manager are committed to being as transparent as possible. We hope that you agree with us that adopting this approach provides the greatest possible level of prominence to this critical principle.</p> <p>We will also continue to support the development of UNC mod 0841 in the appropriate UNC working groups by discussing which elements of the (currently drafted) business plan rules can be adopted on a reasonable endeavours basis in the development of BP24. Additionally, as previously offered, we would be very happy to have a direct meeting to run through the business rules being adopted.</p>
Draft P&A	Accessibility	Centrica	No	<p>Xoserve should be flexible about when the Principles and Approach are finalised: We recommend that Xoserve be flexible to further refining the P&A beyond when expected to confirm the final version. The flexibility may be needed to give stakeholders the opportunity to provide feedback on the necessary detail not included in this consultation when it is made available.</p> <p>The key principles in the draft P&A are appropriate (notwithstanding our above comments on transparency) but how those principles will be used to develop and the approach to BP24 have not been sufficiently detailed. As an example, Xoserve has not explained: a) what exactly is meant by collective decision-making; b) the matters that are in scope; and c) how it envisions the decision-making will operate in practice.</p> <p>We are very keen to understand how we will be able to contribute to the collective effort. Another example is the lack of detail regarding the use of the 4E framework – its practical application as an evaluation tool for investments (in addition to detailed cost-benefit analyses) has not been explained. These details will need to be developed.</p> <p>There is another reason why Xoserve should be flexible to further refining the P&A beyond when it expected to confirm the final version. Details that appear to already comprise Xoserve's intended approach to BP24 have not been included in the consultation document. For example, during the 'Roundtable' session, Xoserve stated it is likely to adopt about a half of the 'Business Plan Information Rules' being developed as part of UNC mod 0841 for BP24. Xoserve has not stated which it intends to adopt and has not explained the practical barriers to adopting the remainder. We regard this to be an opportunity that Xoserve has missed to document its proposed approach in full and, therefore, receive more informed feedback from stakeholders.</p>	<p>As per the dedicated 'Engagement' principle, we are committed to ensuring customer feedback underpins the development of BP24. While it's important that contractual deadlines, such as the requirement to publish the P&A final version on or before 31st July, are adhered to, we also recognise that feedback may not always fall into the dedicated consultation periods that occur after key documentation is published. As such, we are going to create and maintain a 'Q&A Register' which will be regularly updated with any feedback received within and outside of consultation periods. This register will include all non-confidential customer comments/questions and Xoserve's response.</p> <p>We will also continue to engage with customers in the UN mod 0841 space as that work develops through the normal regulatory process.</p>
Draft P&A	VFM	Centrica	No	<p>The emphasis on articulating value for money is appropriate: We are pleased that articulating value for money (VFM) is a key principle and that demonstrating the efficiency of Xoserve's cost base seems to be treated as a priority for the BP24 planning cycle.</p> <p>Similarly to transparency, we note this is another area that you have expressed reservations about and stated that input from stakeholders would be helpful to you in determining how their requirements can be met. We, therefore, are pleased that you propose to introduce the 4E framework and, if it is appropriately developed, it should assist Xoserve in demonstrating efficiency and VFM. We have developed 'Business Plan Information Rules' based on the information requirements that other monopoly service providers in the energy sector either voluntarily or are obligated to satisfy. The Rules also provide guidance about how efficiency and VFM can be evidenced.</p> <p>We welcome the report on progress of the efficiency review of Xoserve's cost base and the proposal to include the outcomes in this business planning cycle. We trust that the full findings of the review will be made available to Customers and that Xoserve will clearly demonstrate how the findings will be fully reflected in the BP24 expenditure proposals.</p>	n/a

Draft P&A	Accessibility	Centrica	No	<p>We attach the latest version of the 'Business Plan Information Rules' that we have developed as part of UNC mod 0841, which can be used a checklist when developing BP24. We will use the information provided to meaningfully scrutinise BP24 and to assess whether it represents long-term value for money for consumers. These are key elements that enable relevant UNC Parties to discharge their legal obligation to jointly control and govern the CDSP on an economic and efficient basis.</p> <p>It is proposed that forecasts of the charge rebate for Y-2 and Y-1 will now be included in BP24. We welcome the proposed inclusions. For clarity, we recommend that data relating to the defined terms 'Forecast Over/Under Amount for Year Y-1' and 'Outturn Over/Under Amount for Year Y 2' (as defined in the Budget and Charging Methodology) are included instead. The definition of these terms include Costs, Charge Base and revenue.</p>	We will continue to engage with the development of UND mod 0841. We will align language used in the first draft of BP24 with terminology used in the Budget and Charging Methodology
Draft P&A	Engagement	Centrica	No	<p>What are your thoughts on the 4E framework as a way to measure VFM? Please provide responses that will help us to consider refinements to the framework.</p> <p>In principle, the 4E framework appears to be a reasonable approach. However, Xoserve has not provided any detail on how the framework will be used in practice. As such, we are unable to recommend how the framework can be refined. We welcome the comprehensive review of the Cost Allocation Methodology (CAM), which will support the fourth pillar (Equity) of the 4E framework and look forward to contributing to the review. The CAM necessarily affects the charges that each Customer is required to pay and, as such, we strongly encourage Xoserve to formally seek feedback from Customers instead of relying only on feedback from the Contract Management Committee. This wider consultative approach is commonplace in all other segments of the energy value chain.</p>	<p>When presenting costs (S&O and Investments) we will use the 4Es as a common language through which we can explain how they represent VFM.</p> <p>We agree that appropriate consultation with customers is a critical part of budgeting / business planning. This is true regarding the Business Plan itself, and we will ensure that when feedback on the CAM review is required, we will ensure all DSC contract managers will be invited.</p>
Draft P&A	Uncertainty	Centrica	No	<p>Do you agree with our approach to the application of inflation to unscoped change budgets?</p> <p>We are unable to provide informed feedback on the appropriateness of the approach. Xoserve has not shared information that would enable us to assess whether the proposed approach is appropriate. In the 2023-24 Business Plan, Xoserve stated that it "...would assume full application of CPI-H" pending the outcome of its review of the application of inflation⁶. Xoserve has not shared the methodology used to conduct that review or the analysis and findings with Customers. We have repeatedly highlighted that it is unhelpful for Xoserve to request feedback from Customers on its proposal(s) but without providing any supporting justification or evidence</p> <p>Xoserve should not finalise its position on the application of inflation to its cost base until the methodology used to conduct the review of inflation and the subsequent analysis and the findings are made available to Customers and they have had the opportunity to provide feedback. Xoserve should also justify its choice of the measure(s) of price uplift if uplifts are considered appropriate</p>	We will describe our proposed approach to inflation (for BP24) when we publish the first draft.
Draft P&A	Engagement	Cadent	No	I welcome the various channels in engagement which is being undertaken.	n/a
Draft P&A	Accessibility	Cadent	No	As per previous years, the financial information for DNs to be provided via excel, in a timely manner.	We will provide this as previously.
Draft P&A	VFM	Cadent	No	Supportive of this [4E] approach. It will need to be monitored and reviewed to ensure it is appropriate.	We will monitor and review the application of the 4E framework as we progress through the BP24 process. Any learnings will be applied to future business plan documents
Draft P&A	Engagement	SGN	No	SGN believe the plans set out in the Principles and Approach document will provide sufficient opportunities to engage in the BP24 process.	n/a
Draft P&A	Accessibility	SGN	No	The clear and concise presentation of the Principles and Approach documents and the subsequent Round Table is very much welcomed. SGN would like to see this continued across the entirety of the BP24 process with the relevant Business Cases and transparent supporting documentation including financial schedules shared with DSC Parties.	We will apply the principle of accessibility to all BP24 documentation.

Draft P&A	Accessibility	SGN	No	In addition to the data shared in prior years Business Planning processes SGN would look for Xoserve to provide detail information regarding Capital and Operational expenses at a sufficiently granular level i.e. Distribution Network to allow us to inform our Annual Budget setting processes. Although the BP24 will provide forecasts for the first years of GD3 the Distribution Networks will require forecasted costs from Xoserve for the entirety of the GD3 period to support or submissions to Ofgem.	We are committed to providing a greater degree of transparency to our direct costs.
Draft P&A	VfM	SGN	No	SGN supports the 4E Framework as a starting point to further develop the Economy and Efficiency of the services provided by Xoserve and its Third Party Service Providers. This should ultimately help drive Contract negotiations and engagement with DSC Parties regarding how services are funded and delivered.	n/a
Draft P&A	VfM	SGN	No	In principle yes [we agree with your approach to the application of inflation], however based on the discussion had at the Round Table we would like to see details on the risks presented by the SaaS model and therefore would require each option to be clearly accessed	
Draft P&A	Uncertainty	SGN	No	... we are mindful that a great deal of engagement is being supported by Xoserve regarding Decarbonisation. SGN is conscious that there remains some uncertainty around the level of uptake and rollout of Hydrogen within the network, however with hundreds of SIU's how do Xoserve perceive central systems will manage this integration between with existing Natural Gas, 100% Hydrogen and blending both Biomethane and Hydrogen.	As of today the gas industry systems support a small variation of CV as per the GoTER regulations, however with the introduction of different gases across the network, with very different CV's, new systems and process will need to be developed to support the roll-out of low carbon gas. The decarbonisation team within Xoserve will be looking to develop the system and process designs needed to enable CV variation to be managed across all settlement and billing systems & processes in the future. Although there are still a number of Gov policy decisions to be decided, CV variation is going to need to be managed and is a known variable across all future energy scenarios, therefore spending time developing and designing this capability into the planned settlement and billing systems and processes is seen as low-regret spend.
Draft 1	VfM	W&W	No	<p>WWU's preference is for the Efficiency Review to take place biennially. In our view, if this is carried out annually, it would not give Xoserve sufficient time and resources to make the necessary changes to realise the cost savings highlighted in the Report.</p> <p>We look forward to receiving your plans for responding to the findings of the Efficiency Review in the second draft of the Business Plan.</p> <p>We note that the consultants were only able to assess 60% of the Cost to Operate expenditure, but it is unclear from the report how much of your other expenditure they were able to assess. Do you have any plans for the Consultants to carry out a review on the areas that they were not able to assess this year? Please could you provide your thoughts in your response to the findings.</p> <p>We agree that it is important to seek an independent view into the efficiency and value for money of all aspects of Xoserve's activities, we do however, consider that spending £0.5m on this is costly. The report would have been more beneficial to your customers if the Consultants provided a more detailed commentary on the three areas that Xoserve could improve on.</p>	<p>Thanks for confirming your preferred frequency of future Efficiency Reviews.</p> <p>Alongside the publication of BP24 Draft 1 in September, we also published a summary report which was a high-level overview of a much more detailed version of the Efficiency (VfM) Review final report. This was made available to all DCS Contract Managers via an online portal.</p> <p>Since then we have been developing the Efficiency Review Delivery Programme. We provided an insight into our approach to the ERDP at the dedicated roundtable event on 10th November 2023. You can view the recording of this event on our BP24 Hub: https://bp24.xoserve.com/resources/</p> <p>We will soon be circulating a Terms of Reference for a forthcoming Customer Advisory Board, which will allow for further customer engagement around the ERDP.</p>
Draft 1	Accessibility	W&W	No	We find the dedicated Business Plan Hub where all the Business Plan-related documentation and resources are held very useful. The Hub makes it easy to locate the documents we require, so we request that Xoserve continues to this dedicated Hub in the future.	Thanks for this feedback
Draft 1	Transparency	W&W	No	<p>We are aware that Xoserve are keen to demonstrate that they are fully aware of their customers' request for greater transparency and have highlighted in the P&A where you believe this has been achieved. Whilst we agree that the Business Plan is clear, easily accessible and the Efficiency Review has provided evidence that some of the costs are value for money (with room for improvements), we would welcome more clarity and granular breakdown of these costs as requested in our response to the BP23 consultation.</p> <p>We understand the contractual relationship between Xoserve and Correla and therefore request you continue to feedback to Correla the views of your customers to have more insight into the make up of the estimated costs for BP24 and for future Business Plans.</p>	<p>We have noted and acted upon the desire for a greater degree of transparency in the business planning cycle and related documentation. BP24 includes a greater degree of transparency in comparison with previous business plans, including:</p> <ul style="list-style-type: none"> > A Breakdown of our direct and outsourced costs > Direct headcount forecast and associated costs > Y-1 rebate forecast (with rationale for each element provided in Draft 2) <p>In addition, alongside of the BP24 cycle, we have also provided customer access to our largest outsourcing agreement and made available a detailed and thorough 3rd party assessment report of VfM.</p> <p>We have also provided further information in Draft 2 that we believe further adds to the level of transparency and accessibility, such as:</p> <ul style="list-style-type: none"> > Updates to the rebate table (increased forecast, rationale for rebate elements > Glossary > Findings of the Efficiency Review and our plan to manage them
Draft 1	Engagement	W&W	No	We are interested to understand how Xoserve currently measure customer satisfaction with regards to the Change Process. The change process does not allow all proposals to be accepted and implemented by Xoserve, so we are interested to understand if Xoserve proactively seeks any feedback from the customers affected by the rejected proposals as well as from customers whose changes progress.	<p>Customer satisfaction as to how effectively we manage change is currently measured via a quarterly KVI survey that goes to each DSC contract manager at the start of a 3 week consultation window. Results are reported and tracked at the appropriate DSC Change Management Committee.</p> <p>We are currently reviewing the method by which we poll customers and the questions we ask (to ensure that they are fit for purpose for all changes that we manage), with the objective of making the KVI survey more visible and more valuable. We will bring any changes to the process to CHMC for comment.</p>
Draft 1	VfM	BUUK	No	We feel that in the first instance the Efficiency Review should be repeated every other year. Should this show positive results, that industry is happy with, this could then stretch out to every three years and so on.	Noted, thank you for the comment
Draft 1	Transparency	BUUK	No	It would be useful to see if costs for DSC (£78.2m) include Corella's costs. Are the Outsourced people costs included within 'Operate' costs? And if so, why is this different from 'Direct' where they are included within 'Support'. (Slide 10, page 16)	The majority of Xoserve staff undertake 'support' (as in activities that support the delivery of the General Services captured within Service and Operate costs). However there are some Xoserve staff that deliver a General Service area either wholly or partly / in conjunction with one of our outsourced delivery partners. As such we have made that distinction when describing Xoserve's direct cost base.
Draft 1	Engagement	BUUK	No	We believe that the way the BP has been marketed, with roundtables and lots of engagement makes the process a lot clearer.	Thanks for this feedback
Draft 1	Accessibility	BUUK	No	There appears to be mixed terminology; TOTEX is split by Project Investment and Unallocated Investments and yet the Exec summary table on slide 6 (page 8) refers to Unallocated Projects.	We are introducing a glossary in Draft 2, which we hope will address queries regarding terminology.
Draft 1	VfM	BUUK	No	In Slide 22 (page 40) it states, 'We will continue to maintain current assets as long as technically feasible.' Is this approached in a cost-effective way? For example, it may not be cost-effective to keep systems going which are onerous and expensive, compared to introducing more efficient systems.	You are right to highlight the importance of assessing whether our technical estate is economically, as well as technically feasible. We have updated the relevant sentence in the document to reflect this.

Draft 1	Transparency	Centrica	No	Publication of Xoserve's review of the application of inflation to its cost base (including methodology, analysis and findings) and justification of the choice of the measure(s) of price uplift (if uplifts are considered appropriate) to each cost category	<p>BP23</p> <p>Earlier this year we reviewed the elements that make up our cost base, including our 3rd party arrangements, and concluded that S&O was subject to CPI-H indexation and that this should be applied to the BP23 budget for charging purposes, noting that where costs did not increase by this level then customers would be rebated accordingly at the year end.</p> <p>The review found that applying CPI-H to investments was necessary for those fully scoped programmes (at the time of the review) and which had been costed in 2022/23 prices. The review concluded that investments that were designed to be budgets for within-year 'drawdown' need not be subject to indexation because the projects would be set in 2023/24 prices at the time of the agreement of their individual scopes.</p> <p>BP24</p> <p>We plan to continue to apply (December 2023) CPI-H to 2024-25 Service and Operate costs for calculating customer charging. However, we have refined our approach to investments in our 2024-25 budget, with relatively more funding being placed into the incremental 'Change' investment category, which will not be subject to indexation in the Annual Charging Statement.</p> <p>For example, we have separated the UK Link Roadmap into 'Sustain' and 'Enhance' sub-categories, with the former remaining in the 'Infrastructure' category (which is subject to indexation in the Annual Charging Statement) and the latter being moved into the 'Change' category (which is not). Critical IT-sustaining scope is fixed, and very unlikely to change within the period, whereas IT-enhancing activity is more nuanced and, in the case of UK Link, dependent on currently in-flight exploration activity which will determine the options we can present to customers as we approach a mandated SAP upgrade later this decade.</p>
Draft 1	Transparency	Centrica	No	Resource data should be extended beyond permanent personnel to include temporary and contract staff;	The resource data contains our current forecast of all required staff for the business plan period. We are not currently forecasting any requirement for contract staff, however should this position require a review we will consult with customers.
Draft 1	Transparency	Centrica	No	Details on the drivers of each rebate component and the impact of each driver (page 24);	We have updated the relevant table in BP24 Draft 2 (P26) with rationale for each element of the rebate forecast
Draft 1	Transparency	Centrica	No	Details on how efficiencies driven by the Gemini Sustain programme were identified and have been embedded in the proposed expenditure (page 21);	We have summarised in Draft 2 thus: "The Gemini Sustain+ programme has modernised and optimised the technologies used within the platform. This has resulted in an annual £0.5m reduction in the S&O costs associated with Gemini. It has also moved to a DevOps supporting framework, which reduces the ongoing cost of managing and delivering change" (P.23)
Draft 1	Transparency	Centrica	No	Details of how the renegotiation of the RECCo service costs led to the reduction in 'Service and Operate' (S&O) costs (page 21);	We have summarised in Draft 2 thus: "Costs associated with RECCo services were renegotiated, which made the activity more economic (£1.4m less expense). This resulted from a restructure of the architecture of platforms holding the Gas Enquiry Service data." (P.23)
Draft 1	Transparency	Centrica	No	An explanation of how developing in-house capability leads to Investment costs being reclassified as S&O costs instead of classifying costs according to the definitions in the Budget and Charging Methodology (e.g. page 48);	The driver for moving Decarbonisation resource from investment (BP23) into S&O (BP24) is so an ongoing requirement can be satisfied, rather than a one off cost continuing to be incurred. In doing this, we can adapt our resourcing strategy to create more permanent roles rather than to employ shorter-term contract resource. The development of in-house capability is a function of the medium to long-term.
Draft 1	Transparency	Centrica	No	Details on the purpose of the '4E' framework, how the framework has been used to inform the plan and how the plan has been assessed according to the framework	We have introduced the 4Es as a means to articulate VFM across the 4 lenses of Economy (are cost reasonable), Efficiency (are costs being utilised to provide services to their maximum), Effectiveness (are services being provided to the required and pre-stated standard) and Equity (are the costs to provide services being fairly shared by customers).
Draft 1	Transparency	Centrica	No	Details on other relevant risks and uncertainties that were assessed, and how the business plan has been tailored to manage those risks and uncertainties.	<p>Along with many of our customers, we recognise that value is not just Economy (or the other 'E's) in isolation, and so introducing a common language or framework will help us to collectively discuss and assess VFM both in BP24-related discourse and beyond (e.g. contextualising and addressing the findings of the Efficiency (VFM) Review).</p> <p>We have summarised this in Draft 2 (p.43) "A number of uncertainties have been considered when scoping BP24 investment proposals. These range from technical (e.g. SAP support expiry dates and cloud developments), to global (e.g. will events lead to more energy cost challenges and support scheme redeployment), political (e.g. will a potential change to government delay/change policy decisions on hydrogen and blended gas) and market (e.g. will there be changes in market conditions that result in increased or decreased system capacity, or capability requirements).</p> <p>These uncertainties have influenced our proposals in terms of what and when investments should be delivered, and focused us on delivering no-regret spend wherever possible in the upcoming year"</p>
Draft 1	Engagement	Centrica	No	Xoserve should directly involve Customers in the review of the Cost Allocation Methodology: As in our response to the consultation on the Principles and Approach, we encourage you to fully engage with Customers and proactively seek feedback throughout the review of the Cost Allocation Methodology (CAM). The CAM necessarily affects the charges that each Customer is required to pay and, therefore, Customers must be given the opportunity directly to contribute to the review instead of Xoserve relying on feedback from the Contract Management Committee. It would not be appropriate to levy charges according to a methodology that Customers have not had opportunity directly to inform the development. This wider consultative approach is commonplace in all other segments of the energy value chain.	We absolutely recognise the key role customers will need to play in the CAM 'Equity' Review exercise and we will ensure that there will be ample opportunities for all DSC organisations to engage. Further details will be communicated soon regarding the plan including an associated timeline.
Draft 1	Transparency	Centrica	No	Allocation of Costs to Customer Classes – the methodology, assumptions, data and justification for the various allocations should be included.	We intend to address this as part of the forthcoming CAM 'Equity Review', during which customers will be engaged on the potential refinement of the Cost Allocation Model. The current cost allocation methodology is available for download in the dedicated BP24 Hub: https://bp24.xoserve.com/wp-content/uploads/2023/08/Xoserve-cost-allocation-methodology.pdf
Draft 1	Transparency	Centrica	No	Current performance – information on performance during the current year (Y-1) and how that performance has informed the plan should be included.	We have included a full and detailed view of performance v the suite of DSC KPMs and PIs in Draft 2 (p. 80 - 94)
Draft 1	VFM	Centrica	No	The savings identified in the efficiency assessment should be embedded as quickly as possible: We welcome that the efficiency assessment of Xoserve's cost base was undertaken and the Xoserve Efficiency (Value for Money) Review (the Review) has been published. We accept that the timing of the completion of the assessment did not allow Xoserve to take account of the findings in the first draft of the 2024-25 Business Plan. We treat the proposed expenditure in the first draft as merely indicative since the efficiency savings that were identified, and may be available for 2024-25, have not yet been incorporated due to the timing of publication. We have commented on the findings of the Review, especially in relation to the under-utilisation of the contract levers in the Data Services Contract+ (DSC+), in our letter of 20 October. ² We have also recommended steps that should be taken in response to the Review, including addressing governance and contractual issues that are not specific to the development of any particular business plan. We encourage Xoserve to take an ambitious but robust approach to realising those efficiencies. We look forward to the outlook for reduced expenditure in the second draft. At this stage, it is too early to suggest how often the efficiency assessment should be repeated given that Xoserve has not yet disclosed how it intends to respond to the findings of the Review.	<p>The output from the recent Efficiency (VFM) Review provides a detailed and thorough view of where our service provision benchmarks favourably in comparison with similar / other service providers, and where further efficiencies could be achieved. We are committed to addressing the findings and have including our plan and approach to this in Draft 2 of BP24, including target economy gains across the business plan period.</p> <p>We will be instigating and facilitating a Customer Advisory Board (CAB) consisting of change specialists from each of our customer constituency groups. The CABs role will be to support our aspirations to deliver improved efficiencies and savings internally, and through influencing best practice and driving change across the gas sector. The outputs from the CAB, including programme update reports, will be available to all customers on the dedicated BP24 Hub.</p>
Draft 1	Transparency	Centrica	No	Performance indicators relating to contract management and assurance should be developed: Additional performance indicators should be developed that reflect the refocussing of Xoserve's target operating model away from service delivery to contract management and assurance, and that measure how effectively contracts with third-party service providers are managed. We believe these performance indicators are now necessary because the Review has highlighted that levers within the DSC+ to assure value for money for Customers have either not been utilised or have been under-utilised. ³ The under-utilisation of the contract levers is unsatisfactory given Customers' considerable concerns during previous planning cycles about the potential inefficiencies and lack of will to describe the assurance activities that were performed or contemplated. Performance indicators can encourage Xoserve to improve its performance and will provide Customers with transparency about the effectiveness of Xoserve's management of contracts with third-party service providers.	Thanks for this feedback. We are currently assessing options and will engage further with customers in the coming weeks.

Draft 1	Transparency	NGN	No	Thank you for the opportunity to provide feedback on the proposed BP for 2024. We would firstly like to commend Xoserve for applying elements of modification proposals 0841 & 0841A (Introduction of cost efficiency and transparency requirements for the CDSP Budget) to this year's business plan process even though neither of the modification proposals have been approved yet. This shows that you are actively listening to your customers and applying their feedback to BAU processes. The drop-in sessions, webinars and round table chats have been a welcomed addition to the BP process, and we have found them very useful and informative.	I'm pleased to read that you can see how we've listened and acted on feedback - as we stated in our P&A, engagement and transparency are certainly priorities for us in the development of BP24.
Draft 1	Accessibility	NGN	No	Whilst we appreciate the extra level of detail provided in this year's draft business plan, we feel that the document is very lengthy and not all the information is required. For example, sections of the service description table are not required in the document and just bulk out the document. The document is very wordy and repeats itself from the Principles & Approach.	We appreciate that the desire for detail in our documentation varies in range between customer organisations. We will provide a bitesize version of BP24 alongside the Draft 2 (full) version which we hope will provide a summary view of the plan.
Draft 1	General Feedback	Centrica	No	The quality of this draft business plan is a substantial improvement on that of previous business plans. Direct and outsourced cost data, some resource requirements and indicative data on rebates have been included. Terminology in the draft business plan has been realigned with the defined terms in the Budget and Charging Methodology. We welcome the steps taken in response to Customers' requirement for increased transparency. We recognise and appreciate the effort put into producing a higher quality business plan. It is reassuring that the Business Plan Information Rules (BPIR) that have been developed as part of Uniform Network Code Modification 0841 have been helpful to you in developing the business plan. It is also reassuring that the benefits of a framework for developing Xoserve's business plans have been recognised. The latest version of the Modification reflects our close alignment on almost all aspects. We welcome your continued input into the development of the Modification.	Thanks for this feedback
Draft 1	General Feedback	NGN	No	James and Jayne have done an excellent job with this year's BP while also working on 0841 and 0841A.	Thanks for this feedback