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18<sup>th</sup> October 2024

## Business Plan 2025 First Draft

Dear Steve,

We welcome the opportunity to respond to your Business Plan 2025 Draft 1 Consultation and have provided our responses to your questions below. You may publish our response.

### 1. How would you like to see us develop BP25 to build trust?

BP25 refers to six individual Investment Proposals. This is a rise from previous years and we would like Xoserve to explain how they will manage these projects along with day to day business. Project Trident is a significant, multi year plan and we think that the focus for BP25 should be on that. We are conscious that the delivery of six independent projects simultaneously is challenging and it is important that Xoserve have the senior management resource to manage t this work.

In addition to the above, we note that the vast majority of activity for those projects will be undertaken by third parties. There is an ongoing concern following defects and incidents over how Xoserve is managing the performance of Correla who is a third party. We would like to see you develop BP25 with evidence of how you will achieve an excellent level of performance as the projection currently made to show zero major incidents is not realistic. Incidents and defects referred to are as below;

- i) Data breach in July 2024 involving our data, some of which involves the personal data of our staff and/or our customers. The breach was from Correla and their lack of Data Protection training to their employees.

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- ii) DDP PAC reporting. PAC are considering halting a performance assurance for Xoserve following data shared for two Shippers who were incorrectly put on improvement plans. It is currently unknown whether this data was incorrect or if DDP displayed it incorrectly. We note that DDP is a Correla system.

We are also concerned that these incidents, particularly the last one, may not have been notified to the board. Xoserve's KPI focus on the large number of routine operations that it carries out each month and it is important that these operate accurately and on time; however, we don't think that there is enough focus on reporting of accuracy for one off or non routine data extracts.

**2. How would you like to be engaged in the proactive development of proposals to widen CDSP activity?**

Given recent incidents related to CDSP operations we think that Xoserve should concentrate on ensuring that its day to day activities are robust and delivering the six Investment proposals one of which is Project Trident, the upgrade or replacement of SAP. Project Trident is a very significant and challenging project and will take up a significant amount of management time. We are not sure what is meant by "widen CDSP activity"; however, if it is implying the Code manager role, we do not support Xoserve's ambitions to become the Code Manager. It is not a CDSP activity and we would oppose a UNC modification to make it a CDSP service. We also do not think that Xoserve has the knowledge and experience to operate a business that have a licence and everything that goes with that. The transition from a code administrator that operates under the gas transporter licence conditions to a Code Manager that has to comply with its own licence will be a challenge that should not be underestimated and the challenge for an organisation such as Xoserve that has no experience of code administration will be significantly more challenging.

We do not think that the BP25 should contain investment spend or any other spend to look at widening CDSP activity with respect to Xoserve becoming a the Code Manager. In particular any spend in CDSP Service Development relating to Xoserve becoming the Code Manager should be removed.

**3. What are the most important factors Xoserve should consider when assessing potential Trident solutions, and why? Your responses might address cost, durability, scalability and integrability.**

There is a great lack of details on activities and costs surrounding Trident but we acknowledge that a cost summary will be shared with contract managers prior to the release of draft two of BP25.

The most important factor when it comes to Trident is the successful delivery of the project. We suggest that you consider the option of the project being done in two parts, first transition of the existing functionality and then enhancements when the existing process have been demonstrated to be stable on the new platform. The suggestion is made given the difficulties over SAP upgrade / replacement experienced by many organisations;

however, we note that at this stage the decision of renewing to the next generation of SAP's product suite (S/4HANA) has not been made.

**4. What behaviours would you like to see us develop in order to help us deliver your objectives?**

Our main objective is the efficient delivery of CDSP services. At this time, we feel that it is necessary to appoint an Xoserve contract manager for the networks who will be a consistent presence in all meetings. We believe that this action could help with accommodating a number of concerns that we currently have with CDSP services. We acknowledge that Xoserve has responded to our concerns by providing Xoserve representatives at meetings that previously were only with their sub-contractor, Correla; however, we think that having a consistent Xoserve representative would be beneficial.

Also, as mentioned in question 3 regarding project Trident, we would like to see cost transparency for the investments funding. We acknowledge that more information for funding projects Trident and UX will be released prior to the release of draft two of BP25. We require to see more detailed information for the investments as the shared level of spend is really high at £17M (excluding £2.2M NTS Gemini investment cost).

**5. Are there any digital or data initiatives you would like to see in BP25 that would support code reform?**

We have no suggestions on digital or data initiatives to support general code reform. When the code manager is appointed they may have specific requests for data from central systems providers.

Yours sincerely.



Richard Pomroy

**Regulation Manager  
Wales & West Utilities**