

Reference	Phase	Feedback from	Theme	Feedback	Xoserve response	Draft Traceability
BP2501	Draft SPP	Cadent	Trust	<p>We would like to see evidence that Xoserve have understood the intent of UNC modification 0841 which was recommended by industry and ultimately approved by Ofgem. In our view, the main intent behind 0841 was to make Xoserve's BP costs (and methodologies that sit behind them) more transparent so that industry could better measure the value for money of DSC services. Efficiencies and S&O costs are briefly mentioned in the draft Statement of Planning Principles, but we feel that more focus could be given to Xoserve's efforts to deliver efficiencies and value to its customers, versus the large weighting given to Trident and code management.</p> <p>Similar to our feedback at the strategy launch event, I think industry would trust Xoserve's credentials as a potential code manager if the CDSP demonstrated a greater understanding of the forecasted complexities and challenges of the code manager role. We believe that the code manager role will be hugely different to the code administrator and CDSP roles, and it isn't clear whether Xoserve have appreciated the difference, and what additional skills would be required.</p> <p>Linked to the first point on 0841, we believe that Xoserve could build trust by putting itself in the shoes of its customers to identify services it could undertake to save them money. For example, could Xoserve provide a service that costs a DSC customer £1, whereas the same service would cost them £2 to deliver in-house etc.</p>	<p>We intend to comply with the new BPIRs as set out in UNC mod 0841. We have also procured a third party to make an independent assessment of our compliance with the rules and will present the findings alongside each draft of the business plan. We have also updated the final SPP so that it provides more information as to progress of the ERIX programme, and a summary of what to expect in Draft 1 of BP25.</p> <p>The prominence given to Project Trident and Preparing for Code Management in the SPP should not be taken as any indication of a reduction in absolute focus on delivering value for money, robust and secure CDSP services. This remains our core provision, and Draft 1 of BP25 will contain the appropriate degree of detail as to how we will provide economic, efficient and effective services, as well as developing Project Trident and making the necessary preparations for code management (regardless of which entity becomes responsible for that future role).</p> <p>We agree that our centrally-funded model has great potential for new or existing services (that could be delivered centrally) to be undertaken by Xoserve to drive mutual value. For example, it might lead to greater value, be that by making costs more economical, the services more efficient or effective, or for costs to be more equitably shared. We have described our intent to proactively explore this in the 'from assurance to confidence' journey that supports the 'Trust' strategic principle.</p>	<p>We have presented costs in a more granular way than ever before in BP25, including a breakdown of S&O costs into 'People#' and 'Non-People' categories, as well as between 'Direct' and 'Outsourced' categories. This has been done to ensure we are compliant with the relevant BPIRs introduced via MoD0841.</p> <p>In terms of matters of economy and efficiency, we have shown how we are progressing the independent assessors findings from the 2023 'Efficiency Review'. This includes a £0.5m annual reduction in DDP run costs (Service Area 15) from April 2025, which is coupled with functional improvements.</p> <p>We are also proposing investment in CDSP Service Development, which responds to this feedback directly by providing the means for Xoserve develop new solutions that will lead to more efficient and mature data / digital capabilities, and the means for Xoserve to actively develop CDSP services that benefit all.</p>
BP2502	Draft SPP	Cadent	Confidence	<p>We would like to be engaged by Xoserve with opportunities for wider CDSP activities providing that the activities:</p> <ul style="list-style-type: none"> > Align with the strategic direction set by the board and communicated to customers, > Adopt the approach mentioned in the answer to Q1 (e.g. Xoserve provide a service that costs a DSC customer £1, whereas the same service would cost them £2 to deliver in-house etc) > Best utilise Xoserve's expertise and role in the industry, and do not duplicate customers' work/investment in non-CDSP activities > Do not compromise the quality of service of core CDSP services 	<p>We agree that everything we intend to do during BP25 should:</p> <ul style="list-style-type: none"> > Align with our strategic aims > Lead to value outcomes as per our 5E value framework > Fully utilise the existing capabilities we have as an organisation > Deliver high quality services that aren't compromised by new scope being added 	<p>All engagement and our response to it (including traceability to BP25) has been included in D1. The Xoserve Board has provided the clear direction to prioritise delivering quality CDSP services now and in the future, and this remains our core priority. We have provided lots of information in BP25 as to our current and forecasted performance, including outputs and outcomes of each S&O service area. We have also included Investment Proposals that allows us to develop solutions and capabilities that will enable us to continue to ensure / assure CDSP services remain for as long as they are required.</p>
BP2503	Draft SPP	Cadent	Transition facilitator	<p>(The most important considerations for Project Trident are):</p> <ul style="list-style-type: none"> > The flexibility of any Trident Solution to react to the uncertainty within the future gas industry > How customers intend to recover the costs of their investment (e.g. cost pass through via a price control), the impact on consumers' bills, particularly across a potentially shrinking customer base > How the integrity of essential industry processes will be protected during the transition 	<p>We are facilitating a dedicated session on 9th September to walk through the Strategic Outline Investment Proposal associated with Project Trident. I will ensure that we cover these points during the session, which will be recorded for anybody unable to attend on the day.</p>	<p>We have presented an Investment Proposal (Strategic Outline Case) for Project Trident that addresses each point raised.</p>
BP2504	Draft SPP	Cadent	Serving stakeholders	<p>(The behaviours we would like to see Xoserve develop in order to help us deliver your objectives are):</p> <ul style="list-style-type: none"> > An unrelenting focus on the importance of delivering high quality core CDSP services, as a means of earning industry's trust to differentiate into wider opportunities such as code management and decarbonisation > Similar to the point in Q1, Xoserve thinking about how it can best serve its customers, particularly on how the CDSP can deliver activities centrally that save their customers money 	<p>We fully agree that delivery of high quality core services is our priority, with our people being the most valuable asset in this pursuit. To that end, we are proud that scores associated with our people's helpfulness and competence are consistently high in respective Institute of Customer Service (ICS) surveys. The last ICS survey results, achieved having had more survey respondents than ever before, were our best ever, with Xoserve scoring 82.1 on the UK Customer Satisfaction Index (UKCSI), which is higher than the national 'all sector' average.</p> <p>As set articulated in the SPP, we intend to seek out ways we can deliver additional central services to the benefit of all.</p>	<p>See items BP2501 and BP2502</p>
BP2505	Draft SPP	Cadent	Code management	<p>We don't think there is sufficient detail from Ofgem to confirm the scope (if any) of digital or data initiatives required for code management. Instead, we think that investment and effort would be better spent in preparing for the UK Link upgrade.</p>	<p>We agree that the role of a future Gas Network Code Manager is still to be fully defined. As Draft 1 of BP25 will set out, our approach to making preparations for the era of code management will be focused on 'no regret' activities, which we regard as industry requirements regardless of which entity eventually is installed as the Code Manager. Draft 1 will make clear how we will mitigate against these preparations diluting or obstructing preparations for Project Trident (or delivery of CDSP BAU).</p>	<p>Project Trident scope includes the means for Xoserve to improve the digital maturity of the UK Link Manual. We believe that this is both critical to the development and design of the new / upgraded solution, and will improve the integrability of this information (e.g. with a future digital, consolidated UNC/IGTUNC following reform of those codes).</p> <p>We are also proposing to develop CDSP services, so that any impacts driven by future policy decisions (such as via the forthcoming Ofgem Strategic Direction Statement) are managed. This development will be proactive as well as reactive, and will start with:</p> <ul style="list-style-type: none"> > The development of a data and digitisation strategy which builds on the direction in Ofgem's Data Consent Framework to be published in Winter 2024 > A scoping / discovery phase for exploring our Open Data Capabilities > Working with other central bodies to develop Vulnerability and Priority Service Register activities <p>We believe that these are activities will benefit the whole gas industry and be valuable to whichever entity is chosen to be [Gas Network Code Manager].</p>

BP2506	Draft SPP	ICoSS	Code management	<p>We believe that the current gas code governance landscape is overly fragmented and complex with code delivery, code administration and legal drafting sitting with different parties, with overlapping management frameworks and priorities. This has reduced efficiency in the current process and added cost to industry change. Now that Ofgem has committed to the creation of the Gas Network Code and the Code Manager role, we believe this is an opportune time for the industry to identify potential improvements to the current process.</p> <p>We are therefore supportive of the review of the current framework, as proposed by Xoserve in the 2025-2028 Business Plan statement planning principles. As long as such a review does not jeopardise Xoserve's core function or create significant costs for industry parties, we agree with Xoserve undertaking this work for the good of the industry.</p>	We are cognisant of the need to avoid any negative impacts on service delivery resulting from preparations for Code Management. Draft 1 of BP25 will set out how this risk will be mitigated alongside details of potential funding requirements.	<p>We have instigated activity with key stakeholders to explore the role of Code Manager. The output of this work will be a white paper which will be shared with all interested parties, including Ofgem and customers. We are clear that the development of the white paper will not interfere with our absolute commitment to delivery robust, secure CDSP services.</p> <p>See also items BP2505, which summarises the scope of a related investment.</p>
BP2507	Draft SPP	Centrica	Trust	Focus should be placed on explaining how the efficiencies that were identified in the 2023 Efficiency Review will be realised, and how these will be treated and communicated within business plans, and on developing the future arrangements for service delivery.	We agree that continuing the work already in-flight to address the findings from the 2023 'Efficiency Review' is a key priority. The review identified potential areas of opportunity and, via the ERIX programme (and working with the Customer Advisory Board representatives nominated by CoMC), we are making progress in terms of economy gains (cost reductions), and on putting the capabilities in place that ensure that we are competition ready for Project Trident.	<p>BP25 brings forth a £1m reduction in 2024/25 Baseline S&O. £0.5m of this reduction is associated with DDP (currently the primary CDSP reporting platform) run costs. In opposition to most other services reviewed, Reporting was an area that the assessor identified as something to pursue in terms of cost. We have been able to negotiate a decrease in DDP run costs with Correlia, while at the same time enhancing the functionality of the platform to address customer 'pain points'. There are further cost savings as net Gemini (-£0.5m) and CMS (-£.02m) run costs reduce, along with a reduction in FWACV license costs (-£0.1m).</p> <p>BP25 also details the progress made in other areas and how the progression of each in-flight finding could impact future Value for Money. We have met the 9% reduction of 2022-23 baseline S&O (the cost base that was reviewed as part of the 2023 Efficiency Review) through a mix of economy gains since 2023. We have also included further reductions in our forecast that if realised would represent a 12% reduction by March 2028.</p> <p>BP25 In the relevant section (Trust) we have included a waterfall diagram that shows the elements that have lead to S&O reductions and increases.</p>
BP2508	Draft SPP	Centrica	Deliver	Xoserve should explain how it will be able to successfully deliver CDSP Services and large projects within its core role while also undertaking code management strategy and business development activity.	It is right that Customers want reassurance that Xoserve will remain effective in delivery of CDSP services as we deliver on our longer-term strategy, and BP25 will set out the steps we are taking to do this. BP25 will outline in more detail how we plan to expand our capabilities further. At their core these will make Xoserve "competition ready" for project Trident. Xoserve will define the core requirements, procurement strategy and delivery plans for Trident, and work is already underway on this. Indeed, a key finding of the Efficiency Review was that Xoserve should enhance capabilities as an enabler to support initiatives by building more maturity in the capabilities typically required by leading assurance - BP25 will describe how we plan to do this.	BP25 contains lots of information about how we will perform our core role as CDSP, both 'now' and in the future. The Delivery section features an array of information about expected workloads and performance across the various DSC KPMs/Pls. It also describes the enhancements to our current organisational design and some key appointments that will enable us to move to a strategic position of Intelligent Customer and Enterprise Architect. It also communicates the increase in resources that are required to move through the next phases of Project Trident, and the development of CDSP services.
BP2509	Draft SPP	Centrica	Deliver	It is our opinion that the removal of the Customer Advocate role within Xoserve has had a negative impact on service to Customers. Specifically, there has been a decrease in direct engagement with the senior management team, meeting relating to Customers' issues have become less effective and issues are not being resolved in a timely manner. We encourage Xoserve to review the Customer-related roles and oversight within Xoserve to identify how Customer satisfaction can be increased.	We agree that the Customer Advocate role should be enhanced, and have taken a number of steps already, in respect of allocating Xoserve "Chairs" of several customer engagement groupings. BP25 will bring forward proposals for additional, modest investments in this respect	We are proposing a £250k uplift in Service Area 6 (Customer Relationship Management) for new resource within Xoserve. These roles will add a strategic layer to the existing service, which is mostly focused on day-to-day, operational issues. The new function will oversee the provision of this service, identifying the ways in which it could be developed, and will provide an enhanced channel directly into Xoserve.
BP2510	Draft SPP	Centrica	Deliver	In September 2023, Xoserve stated that a review of the Cost Allocation Methodology was underway, and that the outcome would be shared with Customers during the BP24 cycle. We are aware that work has been undertaken and expected that the findings would already have been shared with all Customers. We encourage Xoserve to update all Customers on progress and timelines for completion via the 2025-26 business planning materials.	The inflight Equitability Review is being progressed, with updates being provided in the ERIX Customer Advisory Board and in CoMC. This work will not complete within the timeframe for BP25 development, so the work will not impact the 2025-26 budget.	We have made it clear in Draft 1 that the Equitability Review will not impact the 2025-26 budget.
BP2511	Trident Briefing	SEFE	Cost	What is the split of cost between As Is and To Be?	As we are primarily building a like-for-like model, it will be the same blended team of Business Analysts and Subject Matter Experts working on both as-is and to-be.	n/a
BP2512	Trident Briefing	SEFE	Cost	What is the level of contingency in the £9.7m	Contingency is built into each of the individual component estimates, rolling up to the £9.7m, but not a set percentage or level of the overall cost. The cost breakdowns is built as an indicative estimate and we will have more certainty as we move through the procurement process to Q4 2025.	n/a

BP2513	Trident Briefing	So Energy	Resources	Is the Project Trident structure new posts or existing headcount assigned to project? How many new roles are being created?	<p>For complex multi-year projects of this scale, it is important to have dedicated resources focused on delivery execution to protect delivery of BAU commitments. We therefore plan to have dedicated resources assigned to Project Trident.</p> <p>For the period FY25, we have c.20 resources internal/external planned to be onboarded. This does not include those resources included from other third-parties for Independent Project Assurance, Delivery Partner and Enterprise Advisory partner. Numbers for the additional third party resources are subject to their proposals.</p> <p>We have compared our numbers and structure against other similar programmes from across the industry, and we believe we are right sized for this stage of the programme.</p>	
BP2514	Trident Briefing	SEFE	Project management	How do we ensure that each part of Trident is delivered on time and in budget noting Nexus but more current MWHH delays/issues	<p>In Projects of this scale and complexity there are many unforeseen risks that can emerge during the lifetime of the project, which can result in unplanned changes to timescales and therefore cost.</p> <p>To mitigate this Project Trident has adopted a robust cadence of risk management (identification, impact assessment, mitigation) which is tracked and reported through project governance. We've attached a copy of the Programme Governance framework for reference.</p>	n/a
BP2515	Trident Briefing	Cadent	Stakeholder Engagement	Please could you explain how customers' views on the question of whether to make further changes/enhancements 'whilst the car bonnet is open' is built into the procurement timelines, strategy, and costs?	<p>As detailed within the Strategic Outline Case, we are not anticipating new functional requirements to UK Link within Project Trident. There are however opportunities to improve processes "whilst the bonnet is up".</p> <p>We will be running workshops with customers to obtain their input into the improvements that they would value over the as-is processes. During these workshops, which we expect to occur in the first half of 2025, we will also be looking to identify opportunities to how we can build flexibility within the future UK Link to adapt to new functional requirements that may occur after the solution build.</p>	n/a
BP2516	Trident Briefing	Centrica	Cost	Can you elaborate on the licensing requirements and how this supports the project?	Licensing costs refer to the licenses for tools that we expect to use within the programme for: Project Management, Enterprise Architecture, Requirements Management and Open Data Capability. It is also a provision to cover the enhanced number of licenses for the additional headcount may require to support with the As-Is and To-Be modelling.	n/a
BP2517	Trident Briefing	EON	Stakeholder Engagement	With the hefty budget contribution and the call for stakeholder engagement, how do we make sure we as the customers are not doing the work we are paying you to do?	We don't want to underestimate how much stakeholder engagement may be required. We will be using a three-step engagement model; ranging from "Level 1-Inform" to "Level 3- Consult" where there will be a range of information shared and input solicited. Xoserve will be leading on this. With or without customer engagement, the programme management, design and implementation will sit with Xoserve.	n/a
BP2518	Trident Briefing	Centrica	Governance	Will you be providing details of the governance framework?	Yes, we will make available a view of the Governance Framework expected for the FY25.	n/a
BP2519	Trident Briefing	EON	Core services	How do we make sure we get the basics right and have a more reliable day 1 position (without months of bug fixing) to battle?	As with all programmes, extensive focus will be on creating a robust set of detailed requirements as a baseline. With the help of the industry, we anticipate that a code chill will reduce the amount of change that will need to be absorbed during the design and build phases. Comprehensive system, integration, user and market testing phases will be critical to ensuring that the resulting system(s) are fit for purpose and facilitate delivery of 'right first time' business processes.	n/a
BP2520	Trident Briefing	Centrica	Governance	How will the spend/balance of the project be updated to Customers?	This will be through the usual channels such as CoMC as well as through further confidential briefings if/when required.	n/a
BP2521	Trident Briefing	Centrica	Core services	What steps are being made to guarantee levels of service for core services?	<p>Where Project Trident draws on resources, particularly human resources, it is important that we have created required capacity within Xoserve and its third-party providers to ensure that business as usual activities remain a focus and fully resourced. We have therefore included costs for this to be achieved.</p> <p>As we move into later stages of design, build and implementation, we think it will become more important that the usual levels of change activities are slowed to free up further capacity for Xoserve, third party providers and customers alike.</p>	n/a

BP2522	Draft 1	Multiple	Core services	More focus should be applied to the improvement of CDSP services	<p>Some customers felt that Draft 1 didn't fully address specific examples where performance has been suboptimal due to incidents that have occurred. Our approach to presenting our 'effectiveness' at providing CDSP services in Draft 1 was to focus on our performance vs the series of 49 Key Performance Metrics and Indicators (Data Service Contract 'KPMs' and 'PIs'). These metrics are wide-ranging, with our performance either being improved or maintained in comparison with the previous Financial Year.</p> <p>In some cases, incidents that occur with service provision are not directly relatable to, nor impact upon on a KPM or PI. Following customer feedback, we recognise that Draft 1 didn't go far enough in terms of explaining what we intend to do in addressing and mitigating against such incidents from reoccurring in future.</p>	<p>Draft 2 addresses this by proposing that Xoserve's capacity and capability to perform qualitative assurance at key phases of projects and releases being delivered by 3rd parties is enhanced. We propose to increase direct Xoserve Service and Operate by £0.4m from 2025-26 to fund dedicated enhance qualitative assurance resources.</p> <p>Root cause analysis of recent incidents suggests that applying a greater degree of qualitative assurance during test phases of releases could have prevented the incidents from occurring. These new resources will be embedded into projects and releases being delivered by 3rd party suppliers, with the intensity of deployment being based on a predetermined set of criteria (e.g. risk, cost) – we will share our approach to each project / release prior to deployment with the DSC committees (ChMC and CoMC) as appropriate. Once resources have been deployed, we will provide customers with regular in-flight project health-checks and the actions we are taking to mitigate future incidents from occurring.</p> <p>We are also set to facilitate a review of the existing KPMs and PIs with the DSC CoMC, with work commencing before the start of the BP25 period. In addition, we are developing strategic Key Performance Indicators which will allow us to measure progress against the strategic journeys that we set out in the Statement of Planning Principles. We will ensure that we engage customers and stakeholders as this proceeds.</p>
BP2523	Draft 1	Multiple	Innovate	The scope presented in the Digital UX Investment Proposal isn't critical for BP25	<p>We received feedback as to the timing, scope and criticality of the proposed investment in Digital UX, with multiple respondents stating the need for BP25 to focus on priorities such as CDSP service improvements and Project Trident.</p> <p>While we believe the benefits set out in the Investment Proposal are tangible and achievable, we also recognise that BP25 should focus on customer priorities at this point time – given the lack of support for this project to proceed in 2025-26, we have reassessed its inclusion in BP25.</p>	<p>We are withdrawing the Digital UX investment from this Business Plan cycle and will reassess its inclusion in BP26. We will instigate further customer discussion ahead of the BP26 cycle.</p> <p>The withdrawal of this Investment Proposal reduces the overall investment profile in the 2025/26 budget by £0.9m. The impact on S&O is that the £0.3m 'run' costs associated with a future Digital UX solution have also been removed.</p>
BP2524	Draft 1	Multiple	Cost	Constituency costs should be included	Multiple customers shared the requirement for a summary cost breakdown at DSC constituency level.	We have included the costs for Shippers, Distribution Networks, National Gas Transmission and Independent Gas Transporters in Draft 2 .
BP2525	Draft 1	Multiple	Core services	Funding should reflect CDSP scope	Respondents sought reassurance that BP25 was solely focused on CDSP scope.	We are clear that the scope of the CDSP Service Development Investment Proposal, is to deliver a CDSP Data and Strategy, explore the potential for a CDSP Open Data solution, and to insulate CDSP services and processes from potential changes that may arise from Code Reform (i.e. following the publication of the inaugural Strategic Direction Statement).
BP2526	Draft 1	Multiple	BPIRs	Further compliance with the BPIRs could be achieved	<p>As part of their independent assessment of Draft 1 compliance, the assessor made a series of recommendations. The list below summaries how we have updated BP25 to address these recommendations, and how customer feedback on BPIR compliance has been used to make improvements.</p>	<p>The following sections of the Annexe document have been updated:</p> <ul style="list-style-type: none"> 1.1Schedule for the publication of material - updated with new publication dates 1.2Stakeholder engagement – updated with all Draft 1 customer correspondence and Xoserve's responses and non-confidential Project Trident Q&A 1.3Current Performance – updated with a Q2 performance table 1.4Outputs – updated with reference to the inclusion of proposed new Enhanced Qualitative Assurance resources 1.5Investment Proposals – updated with reference to planned activities to address not-fully-compliant BPIRs 1.6Costs and Expenditure – updated with new VIM table 1.7Allocation of costs to customer classes - updated with additional information about cost allocation and the planned Equitability Review activity 1.8Assurance activities – updated with D2 assessment
BP2527	Draft 2	WWU	CDSP Service Development	Funding should reflect CDSP scope	<p>The scope of the CDSP Service Development Investment Proposal, is to deliver a CDSP Data and Strategy (£0.1m), explore the potential for a CDSP Open Data solution (£0.3m), and to insulate CDSP services and processes from potential changes that may arise from Code Reform - i.e. following the publication of the inaugural Strategic Direction Statement (£0.2m).</p> <p>Xoserve has responded, and will continue to respond, to Ofgem's consultations and other requests for information in respect of Code Management. We remain of the view that the Code reforms will have an impact on Xoserve's future, especially if a blueprint similar to that in our Code Manager White Paper is adopted.</p> <p>The Board has directed the Strategy Team to continue this engagement with Ofgem and to be prepared to support the selection process that the regulator decides to use to appoint the Code Manager. However, we see no need for any specific budget to continue this work, and BP25 therefore contains no budget allocation.</p>	We can provide additional reassurance that this investment is not intended for use to promote Xoserve in any way as future Code Manager. Should there be no impact on CDSP services resulting from Code Reform during 2025/26, the associated funding for this element of scope (£0.2m) will not be used / will be rebated.
BP2528	Draft 2	WWU	Core services	The CDSP does not only process large volumes of data, it also provides information to other parties such as the Performance Assurance Framework Administrator. As performance in this area has been poor we suggest that Key Performance Indicators are introduced to cover this and other areas of CDSP activities.	We acknowledge the reporting error that occurred in the production of a report for use in the Performance Assurance Committee.	We are facilitating a review of DSC KPM/PIs. We will ensure that your suggestion (of including a new PI specifically to cover PAC reporting) is included in this review. We have also proposed new resources to carry out Enhanced Qualitative Assurance at key stages of 3rd party delivery of projects and releases, and our expectation is that this will help to mitigate similar incidents in future.

BP2529	Draft 2	EON	BPIRs	<p>We welcome the improvement in transparency and quality of information, and Xoserve's proactive approach over the past two years to embrace the BPIRs introduced under UNC modification 0841. We also are pleased to see some feedback was taken on board from those who responded to Draft 1, with changes implemented in Draft 2.</p>	<p>Thanks for this feedback. We believe the introduction of the BPIRs have added value in the production of BP25. We also regard customer and stakeholder feedback as critical to producing a CDSP Business Plan that reflects customer priorities.</p>	n/a
BP2530	Draft 2	EON	Core services	<p>Our first chief interest is in Xoserve delivering its core services in a cost-effective way, reliably. Amongst other failures in 2023-24, the failure of DDP and of PAC reporting was grave. It led to real reputational harm to customers, and has had a serious impact on trust in Xoserve to deliver its primary functions and assure the services provided by its contractors.</p> <p>Though we welcome the recent engagement on these incidents and the work being undertaken to improve DDP, it was disappointing to see that inclusion of actions to strengthen assurance was included only after customer feedback to Draft 1. We feel this still strikes as an afterthought, and would welcome further detail to provide reassurance as to the adequacy of these actions and the tangible improvements customers can expect.</p>	<p>We acknowledge the reporting error that occurred in the production of a report for use in the Performance Assurance Committee.</p>	<p>We are facilitating a review of DSC KPM/Pis. We will ensure that Pis specifically to cover PAC reporting is included in this review. We have also proposed new resources to carry out Enhanced Qualitative Assurance at key stages of 3rd party delivery of projects and releases, and our expectation is that this will help to mitigate similar incidents in future.</p>
BP2531	Draft 2	EON	Project Trident	<p>We recognise the need for Project Trident, and are pleased to see Xoserve approaching the project with an open mind, considering a range of options which takes account of the long term future of the role of gas post energy transition. This is a significant investment, ultimately funded by the e consumer at a time when cost of living is under pressure.</p> <p>Our second chief interest is therefore ensuring value for money for Project Trident, and a focus on delivery of a product which provides long term benefit to the industry. We believe currently there no formal incentive for costs to be kept down, and therefore oversight from customers is needed to ensure visibility and supervision of Project Trident spending. We propose a customer oversight board should be established to this end.</p>	<p>We are pleased to hear that the need for this change is recognized. We will continue to consider a range of options to deliver the best value for money for our customers and the sector long-term, and ultimately the end consumer.</p> <p>The perspectives of our stakeholders and customers will be essential to Project Trident in helping us choose and procure the right solution at the right price. We agree that more representation of the customer voice is required within Project Trident and specifically within our Steering Group, the highest level of Project Trident specific governance. We have had a space within this committee for a Stakeholder Representative since initiation and are actively seeking the right individual or individuals to support in this forum. We are seeking and soliciting input from customers into how we can best do or structure this, and it is likely that this solution will include one or more stakeholder representative on this committee and a supporting customer forum. We are eager to introduce a structure and would welcome feedback on this proposal when it is formally shared early next year. We plan to run this as a consultative process with customers to ensure that this structure is trusted by customers as representing their perspectives and views.</p> <p>The ultimate oversight and decision-maker for Project Trident is the Xoserve Board, and the customer nominated directors and visibility of Project Trident spending will be provided within the existing structures for CoMC. Please also use these structures to input into the oversight of Project Trident.</p> <p>With regards to timelines, these are currently indicative dates and we will continue to share updates as dates are clarified through our existing communications channels such as the Project Trident webpage, The Tide newsletter and milestone specific engagements, such as the BP25 Contract Manager briefing. We consider this project to still be a work in progress and welcome suggestions for how we can better share information to help you prepare for inputting into Trident and for the change that it will bring.</p>	n/a
BP2532	Draft 2	Cadent	Core services	<p>We appreciate Xoserve's recognition that although general scores across DSC KPMs support a strong forecast for future levels of performance, material issues that have occurred within the last year do not fall under these metrics. A reduction in the likelihood and severity of these material performance issues is important to customers, and we support the introduction of the proposed qualitative assurance activities and associated investment.</p> <p>However, we would encourage Xoserve to benchmark their current levels of performance in this area and consider how to report against this baseline in the future following the implementation of the qualitative assurance activities. This comparison will aid customers' understanding on the effectiveness of the investment and interventions.</p>	<p>We believe that the forthcoming review of DSC KPMs/Pis will be a useful exercise, and look forward to engaging with customers on this topic. In addition to this review, we are also developing a Strategic Scorecard, which will enable us to track the effectiveness of our delivery of strategic initiatives - this will include assurance. We intend to consult with customers on the scorecard during Q4 of 2024-25.</p>	n/a
BP2533	Draft 2	Cadent	CDSP Service Development	<p>With regards to the fourth area of feedback identified within Draft 2 (page 28), we appreciate Xoserve reiterating its position during webinars and within the Business Plan itself that all investment relates to CDSP services delivery. However, we remain of the position that there is not enough certainty within Ofgem's/DESNZ's policy at this stage to definitively require investment in CDSP services. Policy announcements to date have focussed on code consolidation, code manager license characteristics and selection processes, and we struggle to understand the consequential impacts to the CDSP, and levels of investment required. We would welcome examples from Xoserve on how they perceive energy code reform to impact their CDSP services in the next twelve-months.</p>	<p>The majority of funding in the CDSP Service Development investment proposal (total £0.6m) is for the delivery of a CDSP Data and Digitalisation Strategy document (£0.1m) and the exploration of a CDSP Open Data Solution (£0.3m). The remainder of this budget (£0.2m) is to insulate CDSP services from any changes that may become required as a result of Code Reform - this does not include any Code Management related activity. With the inaugural Strategic Direction Statement being published after our Business Planning cycle concludes, we believe that it prudent to include modest provisions for any impacts on CDSP services, but will not utilise this element of the budget if there are no impacts.</p> <p>Xoserve has responded, and will continue to respond, to Ofgem's consultations and other requests for information in respect of Code Management. We remain of the view that the Code reforms will have an impact on Xoserve's future, especially if a blueprint similar to that in our Code Manager White Paper is adopted.</p> <p>The Board has directed the Strategy Team to continue this engagement with Ofgem and to be prepared to support the selection process that the regulator decides to use to appoint the Code Manager. However, we see no need for any specific budget to continue this work, and BP25 therefore contains no budget allocation.</p>	n/a

BP2534	Draft 2	Centrica	CDSP Remit	Activities that are beyond the scope of the CDSP's current authorised remit should not be undertaken.	The BP25 budget is completely focused on the activities we believe will help us to deliver CSDSP services economically, effectively and efficiently, now and in the future.	n/a
BP2535	Draft 2	Centrica	Project Trident	Additional information on Project Trident should be provided.	We agree that customer engagement is a critical activity for the success of Project Trident, and you may recall from our launch event in September, we emphasise this as a key principle for successful delivery. Further details are also available on the Project Trident website at Xoserve.com , and in the Strategic Outline Case . There are several forums where we expect customers to be involved:	n/a
BP2536	Draft 2	Centrica	Current Performance	All aspects of current performance should be presented in the business plan.	BP25 provides extensive performance statistics which satisfy the related BPIRs ('Current Performance' and 'Outputs') – this is reflected in the robust and independently calculated 100% compliance score in these areas. These statistics largely focus on where performance is measured via 49 Key Performance Metrics (KPMs) and Indicators (PIs). Xoserve takes very seriously any incidents that impact customers. Some examples of such incidents have been referenced in customer correspondence, which we have acknowledged and are responding in 3 key initiatives, which are described in the Final Draft:	BP25 describes our approach to addressing performance incidents: 1.The facilitation of a DSC Contract Management Committee (CoMC) review of the existing DSC KPMs and PIs •In discussion and collaboration with CoMC, this activity will enable an assessment of whether the existing KPMs and PIs need to be refined to measure more / different areas of operational performance. We agree with you that this work is important, and as such will be appropriately prioritised. 2.The introduction of new Xoserve resources to undertake Enhanced Qualitative Assurance •Root cause analysis of historic incidents that have impacted customers informs that the application of embedded Xoserve resources in projects / releases being delivered by 3rd parties, focussing on qualitative outputs (e.g. test assurance) will help mitigate such occurrences in future. These resources are proposed to be added from the start of the 2025-26 financial year and will then be deployed systematically, based on a pre-determined criteria which will consider risk of customer impact as a top priority. 3.The development of a Strategic Scorecard •This will enable customer insight into how Xoserve is performing in the delivery of strategic initiatives (such as Enhanced Qualitative Assurance). We will consult with customers on this soon.
BP2537	Draft 2	Centrica	BPIRs	We disagree with some aspects of the independent assessor's view of compliance with the Business Plan Information Rules.	We have carefully considered your comments related to the independent assessor's view of compliance against the BPIRs, and have provided these to the assessor for consideration. We are satisfied that the independent assessment is therefore an accurate view of compliance..	n/a