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6th December 2024

Business Plan 2025 Second Draft

Dear Steve,

We welcome the opportunity to respond to your Business Plan 2025 Draft 2 Consultation. You may publish our response.

Following your responses to consultations you received for Draft 1 we have the following feedback.

1. We note that you recognise your focus on performance against the series of 49 Key Performance Metrics and Indicators resulted in lack of details in regard to addressing and mitigating incidents recurring in the future.

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.

2. It is mentioned 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.

Wales & West Utilities Limited

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We are not clear on what significant impacts Xoserve is likely to face from Code Reform. We can see that there may be impacts from any directions received as a central systems provider under the provisions of the Energy Act 2023, if that is the concern then it should be called out specifically. Following your response dated 21st November 2024 to our comments on the first draft of the business plan, you reassured that there is no spend in CDSP Service Development relating to Xoserve becoming the Code Manager. The line “insulating from potential changes” line was not included in draft 1 and so we do not understand what has changed. We do not see that Xoserve will be significantly impacted by the move to Code Manager and require clarity on what this line item Xoserve envisage being funded by this line together with clear boundaries on what is out of scope for the funding on this line.

WWU's view is that CDSP activities do not include Code Management and therefore the DSC budget should not contain spend to fund a bid for the Gas Code Manager licence.

Yours sincerely,



Richard Pomroy

**Regulation Manager
Wales & West Utilities**