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James Rigby
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By email to business.planning@xoserve.com

24 January 2025

Dear James,

SGN – Business Plan 2025-28 Final Draft Response

SGN welcomes the opportunity to comment on the final iteration of the Draft Business Plan 2025-28 and the various supporting documents provided to DSC Customers on 20th December 2024. This is a non-confidential response on behalf of SGN.

Following Xoserve's responses to the consultations for both Draft 1 and 2 we have the feedback below.

BP25 Documentation Provision

As raised previously we do not see an improvement in the approach adopted of over-provision of narrative without substance. We require clear and concise detail which is accessible to customers, including cost breakdowns and clear traceability between plan iterations.

CDSP Service Development

We continue to see a clear indication from Xoserve that they wish to actively explore the role of Code Manager without the clear intention to consider the concerns of customers.

We have significant concerns regarding a strategy to pursue additional activities given the ongoing challenges with business-as-usual operations in light of recent performance failures. Furthermore, as indicated in our Draft 1 response we would wish to ensure that Xoserve do not impede the delivery of Project Trident by seeking to expand its scope in the shadow of a major industry project.

Business Plan Information Rules (BPIR)

We note that the majority of the BPIR requirements have been achieved however that Cost Benefit Analysis of Investment Proposals will not be delivered/implemented until the 2026 Business Plan. We are therefore unclear how Xoserve customers will have the opportunity to see the proposed methodology prior to BP26 publication.



Additionally, the current performance matrices accessed under the BPIR do not sufficiently encompass all areas of performance and Xoserve have chosen not to address these within the BP25 to date therefore we would support an adjustment in the Final BP25 to address these accordingly. SGN would welcome a review of the current Key Performance Indicators and any other Performance matrices which could provide a wider understanding of Xoserve's overarching performance and which may more appropriately reflect overall performance. From an Xoserve perspective, tracking of all performance areas would demonstrate the impact of improvement steps and issue-resolution, and therefore a review of the KPIs would seem beneficial to all parties.

Although we understand there are elements of commercial sensitivity within some of the proposed Investments we will continue to push for greater transparency and ask that reporting on the Investment Proposals be provided to the Contract Committee. The reporting should provide progress on the delivery, actual cost to budget analysis, and any overarching challenges the project may be experiencing along with mitigation activities.

Should you require any further information with regards to our response then please do not hesitate to contact me at Sally.Hardman@SGN.co.uk

Yours sincerely,

Sally Hardman
Regulatory Process Manager
SGN