



xserve

2022 Business Plan

Principles and Approach - Feedback and Responses



Introduction and Contents

Introduction

At the end of June, we published our Draft Principles and Approach document, which shared the context and thinking behind the development of our 2022 Business Plan.

During the subsequent consultation period, we invited customers to provide feedback on the approach, including responses to specific questions designed to help us to understand what our customers would like to see reflected in Business Plan 2022 (BP22).

We would like to take this opportunity to thank all our customers who took the time to provide us with their comments. The responses contained some great questions, alongside some valuable insights, which helped to inform both the first draft of our 2022 Business Plan and our plans for ongoing customer engagement.

We have collated the feedback we received (except feedback sent in confidence) and our responses into this document for customer reference.

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Section One: Feedback on Consultation Questions

Customer	Feedback Provided	Xoserve Response
01. What else should Xoserve take into account in respect of potential impacts/ benefits for customers and consumers?		
Centrica	How will Xoserve's new role as Contract Management assurance function impact customers? With the DSC+ contract discharged to Correla what are the impacts to customers and consumers?	<p>As the Central Data Services Provider (CDSP) to the gas industry, Xoserve historically both managed and delivered work in order to provide services to our customers. This effectively meant that Xoserve was marking its own homework, with customers bearing the risk of poor decisions or implementation. If Xoserve didn't deliver, all customers could do under DSC was share a few stern words and wait for Xoserve to fix it. In addition, Xoserve was able to innovate only to the extent that every CDSP party agreed to cover the funding of that innovation, and with many conflicting commercial interests represented in the CDSP customer base, this often led to an impasse where maintaining the status quo was all we could do and innovation and optionality were stifled.</p> <p>Xoserve's role as CDSP hasn't changed. We are still accountable for delivering services to customers. However, the way we do that has changed. Xoserve now manages and assures Correla's performance as its main delivery partner. Xoserve can assess service quality independently, on behalf of customers, without any conflict of interest, increasing transparency and openness. Xoserve can push for better solutions and outcomes, unencumbered by concerns about how it's going to be delivered and diluting expectations in the process. Further, for the first time, there are commercial levers which can be applied to the organisation delivering the services on behalf of customers in the case of serious under performance.</p> <p>Therefore, what customers can expect of Xoserve following the restructure is:</p> <ul style="list-style-type: none"> • Greater emphasis on contract and performance management of all Xoserve delivery contracts, including DSC+, AUGÉ and PAFA. • Greater attention and rigour applied to tracking and addressing KPM performance. • Focus on delivery of improvements where performance issues do arise, as Xoserve can require detailed performance improvement plans are in place and are delivered against. • An independent change management service, assuring both solution choice and benefit realisation for investments. <p>Meanwhile Correla will focus on providing the best customer experience possible through continued service improvement initiatives, whilst driving innovation through a combination of private investment and bespoke customer engagement.</p> <p>Overall, the new arrangements are designed to deliver improved CDSP performance to help our customers navigate the rapidly changing energy market.</p>
02. What are the key risks and issues you are facing? How do you feel these could be mitigated/addressed by Xoserve?		
Centrica	Correla's ability to innovate and provide funding to meet the CDSP obligations could be perceived as a risk to customers. Clear funding and ownership details of each element that is proposed to be delivered by a third party should be provided.	<p>For the CDSP services delivered through Xoserve, continuity of experience in both companies, combined with the alignment between DSC and DSC+, maintains risk levels as they were before, while the introduction of commercial levers in DSC+ to incentivise performance actually reduces risk.</p> <p>BP22 will clearly identify where we are suggesting that customers take advantage of private investment via Correla and we will engage with customers throughout the process to ensure that the basis on which customers can then access and utilise the capability being funded is clear.</p>
BUUK	<p>A continued risk BUUK is facing is the lack of understanding on Xoserve's part regarding the specific processes and requirements of IGTs (an example being the recent total system outage).</p> <p>This lack of understanding is also reflected in the budget planning process. Generally we welcome the recent engagement and the provision of the 'Budget Timeline' presented in BP22. We believe however that further input from IGTs throughout this process should lead to more durable budgets, certainly from an IGT perspective, and will allow IGTs better foresight to plan accordingly.</p> <p>An example of shortcomings in this area are the oscillations evident in the change budget from year to year resulting from budget over/underspend. A mechanism that includes a change allowance for reimbursing parties if it is not spent within the year would be beneficial to explore.</p>	<p>Thank you for this feedback. It is a welcome and timely reminder of a valuable customer constituency with which we would like to engage more fully.</p> <p>We will be presenting the first draft of BP22 at Contract Management Committee (CoMC) on 15th September. CoMC has 2 standing members from IGTs and we hope they will join us for this session.</p> <p>We have also scheduled a series of meetings with IGTs, both individually and as a constituency group, during the consultation phase for the first draft to benefit from their thoughts and insights.</p>



Section One: Feedback on Consultation Questions

Customer	Feedback Provided	Xoserve Response
03. Please tell us about any investments you are undertaking which you believe other customers in your segment are also considering. A single service offered by Xoserve in these areas could avoid duplicate investment by customers.		
Centrica	Xoserve should ensure focus remains on the completion of current investments at the most efficient cost to customers. We would like to ensure the UK link systems are not a barrier to innovation and the development of services to consumers are not prohibited by inflexible systems.	We understand your concerns. Legacy systems have often been built from scratch to perform specific activities and can therefore prove to be cumbersome to change as technology evolves and innovation flourishes elsewhere. For this reason, UK Link was created using commercially available components (e.g. Oracle, AMT) to allow for updates and refreshes to the underlying technical components on which the system is built. The desire for flexibility has also been the driving force behind the UK Link roadmap and the imminent move to cloud.
04. Do you think that our approach offers sufficient engagement opportunities for your organisation? If not, what other engagement opportunities would you like to see?		
Centrica	The complex stakeholder engagement processes often have minor impact on the outcome – how will this be addressed in this year’s process? The investment roadmaps should be delivered to all customers not solely on request. Constituency engagement sessions work well, and these should be used to initiate open and honest discussions with customers.	<p>Our stakeholder engagement approach is designed to ensure that all customers can provide input. Unfortunately, given the customer landscape, this results in complex engagement processes.</p> <p>Our ambition is always to produce a first draft of the business plan that represents the optimal investment profile for what our customers have told us they want. An important step to creating that first draft is the consultation on the principles and approach we intend to apply. This year, more customers than ever before responded to this stage and the feedback that they provided has enabled us to create a first draft of BP22 which already builds in some customer insights and feedback.</p> <p>Major change programmes such as CSS, and those changes delivered through the DSC Change Budget, are managed through both the DSC Change Management Committee and supporting forums. The change budget for the first draft of BP22 has, as always, been set by the Change Management Committee.</p> <p>For other investment areas, as a result of the feedback we received during the planning cycles, we included/excluded/amended a number of investment profiles. Examples include:</p> <ul style="list-style-type: none"> • The inclusion of additional CMS funding to replace rather than re-platform the CMS system (BP21) • Re-allocation of change budget costs between constituencies (BP21) • Introduction of unallocated investment profiles for year 2 and 3 of each plan (BP20) • Removal of Market Reform investment costs (BP20) • Re-allocation of costs between constituencies for data investments (BP20) <p>This year, to build in the improvements we made to the process last year, we plan to make the investment roadmaps available to all customers. We are also intending to meet with each constituency group, as well as individual customers, to get their input.</p> <p>We look forward to a continued high level of engagement through this year’s planning process and to receiving and actioning customer feedback. We recognise, however, that it is not feasible to include all individual customer requests to make changes, particularly where those changes are not supported by the majority of our customers.</p> <p>Those customers wishing to add services that do not have the buy-in from others now have the option to engage directly with Correla.</p>
BUUK	<p>Generally yes, the engagement has been good and has seen improvement over the years. As referenced in our response to Question 2, we would like to see further engagement with IGTs specifically to allow Xoserve to better understand our customer requirements.</p> <p>This could be achieved through further ‘information sharing’ interactions to facilitate relationship building and to allow IGTs to provide more regular input.</p>	<p>As noted in our response to feedback on question 2, we will be presenting the first draft of BP22 at Contract Management Committee (CoMC) on 15th September. CoMC has 2 standing members from IGTs and we hope they will join us for this session.</p> <p>We have also scheduled a series of meetings with IGTs, both individually and as a constituency group, during the consultation phase for the first draft to benefit from their thoughts and insights.</p>



Section One: Feedback on Consultation Questions

Customer	Feedback Provided	Xoserve Response
05. In considering a proposal by Correla to fund some of the investment in Exceptional Customer Experience, what would your main considerations be?		
EON	<p>There were significant flow issues, which persisted through March and April 2021. There have also been other issues, which were less significant but caused challenges which as Shippers and Suppliers we had to resource FTE for the resolution of these issues. It was disappointing that we were excluded from the best resolution route and had to instead deliver a resource intensive solution. We would ask for more flexibility (which has been offered historically) in such situations as one size does not fit all.</p> <p>We are unclear why customers need to provide investment in this area and why it should not be part of MTB as it's a fundamental requirement for any business. As with many of the following points, our view may be dependent on the level of investment being requested. There needs to be quantifiable benefits associated to any recommended benefits in this area.</p>	<p>We work hard to ensure that any issues encountered are resolved as quickly as possible and with minimum disruption to our customers. We also aim to ensure that all parties are treated fairly within any processes we operate, including the identification of resolution routes.</p> <p>We realise that the flow issues experienced in March and April 2021 caused significant challenges for some customers and, as acknowledged in our Annual Review for 2020/21, we recognise that there were areas for improvement on how the incident was managed. A Post Incident Review and lessons learned were conducted and led to the creation of a Service Improvement Plan consisting of 62 recommendations. We will continue to seek ways to ensure that the impact of future incidents is minimised for all of our customers and will continue to share progress against the improvement plan through the DSC Contract Management Committee.</p> <p>Transforming customer experience has featured in our business plans for several years, as many customers told us that this was an area they wanted us to invest in.</p> <p>For BP22, we have secured private investment from Correla for a number of our Exceptional Customer Experience initiatives and negotiated further investment from Correla for CMS, allowing this to move to a subscription-based model, funded via MTB without the requirement for up-front investment. This approach was considered carefully, taking into account proposals from alternative software vendors via a benchmarking exercise, with the Correla investment option overwhelmingly providing the best value for money for DSC customers. These changes are clearly identified in the relevant section of the first draft of BP22 and mean that the only investment funding for Exceptional Customer Experience remaining in BP22 is for the continued transformation of our website. This investment is necessary to enable us to transform the website into a digital hub that links all of our services in one place, routing customers quickly to the answers they need, appropriate to their market segment and thus serving their needs quicker and easier than ever before, with associated benefits for our customers.</p>
Centrica	<p>Further investment in the Customer Relationship Management System (CRM). If this Customer Experience investment is a service that is required by the industry, why is the industry not funding this? The CRM is currently an Xoserve system, clear and transparent guidelines should be provided where investment is equal to ownership. This should be provided with an explanation of how this would be transferred to any new Third Party Service Provider allocated the DSC+ contract in the future. We expect to see Investment Business Cases provided with clear benefit analysis for these proposals.</p>	<p>As outlined in the first draft of BP22 (and referenced above), we have secured private investment from Correla for a number of our Exceptional Customer Experience initiatives, including CRM.</p> <p>As the main tool for organising great customer service and responding to queries right first time and on time, it is usual to expect outsourcing service providers to fund their customer relationship management system as these underpin service level and customer satisfaction performance. We see no reason to expect any less of Correla, who see it as an opportunity to indicate their ongoing commitment to the market. The result is that customers will pay less.</p> <p>We note that the CRM (Customer Relationship Management) system is different to the CMS (Contact Management Service) tool which provides a workflow management solution for queries and updates to UK Link data. We have included a proposal for the replacement of the CMS system in the first draft of BP22. In this case, Correla would manage the CMS investment on a subscription model basis, which removes the requirement for up-front investment, allowing it to be funded from MTB.</p>
BUUK	<p>The primary consideration would be the impact of this new model on current charging procedures and whether under the new funding model, charges could be 'spread out' over longer periods of time to better facilitate IGT cash flow considerations. From the perspective of IGTs this represents an optimal model compared to the current 'front end' charging of fees and could allow a broader consideration of projects and system changes in the future.</p>	<p>Thank you for this positive feedback. The ability to reprofile investments in the way suggested here was one of the benefits we envisaged when creating Correla.</p> <p>In the first draft of BP22, we have proposed that the investment in CMS be smoothed to avoid a front-end investment peak and ease cashflow.</p> <p>We would welcome a discussion with IGTs more generally to understand wider commercial considerations in case we can identify other scenarios where such a funding profile could be deployed.</p>
NGN	<p>We are happy with the progress made on the CMS rebuild project and appreciate the scale of this rebuild knowing that many business processes use this system. The only concern we have is that in an effort to make the system more user friendly and appease all customers, requests for process changes are also being taken on board as part of the project however, any changes to these processes would require a MOD/Industry Change approval and therefore there needs to be caution in making commitments in that area.</p>	<p>Thank you for your feedback and for taking the time to follow up in discussion to elaborate on your concerns regarding the scope of the CMS rebuild project.</p> <p>We recognise that MOD/ Industry Change Approval is necessary for process changes and, once requirements gathering has concluded, will proceed to identify those which involve process changes for further discussion in the appropriate forums.</p> <p>We look forward to continuing to work with the GDNs and, indeed, all our customers to ensure that these scenarios are fully understood as the programme progresses.</p>



Section One: Feedback on Consultation Questions

Customer	Feedback Provided	Xoserve Response
06. To inform the level of investment required, what do you believe the level of demand will be for delivery of new core functionality into DDP within BP22? Similar, more or less than in BP21?		
EON	Opening up data is becoming a common theme. For this reason, we query when it will be categorised as MTB given it's one of Xoserve's fundamental priorities. It needs to be clearer as to what is an investment compared to general running costs	Thank you for this suggestion. In the first draft of BP22, we have proposed moving costs relating to Demand Estimation into MTB from 2022/23 and the remaining ongoing run costs associated with DDP Core releases (£349k) from 2023/24 onwards. We look forward to discussing with you during the consultation period.
Centrica	Clear and transparent guidance should be provided with proposals where investment by a third party would amend the industry ownership of the Data Discovery Platform. Please ensure detailed Investment Business Cases are provided to all customers where the development of the core functionality of DDP and CRM will transfer ownership of these essential Industry systems away from customers and toward a third party.	As communicated earlier this year, the intellectual property and associated software licences relating to both DDP and CRM transferred from Xoserve to Correla as part of the creation of Correla. This ensured that Correla was set up to be able to provide services directly to customers beyond the narrow confines of CDSP services (which it provides to Xoserve, for the benefit of customers under DSC+), thus opening up the opportunities for innovation which inspired the restructure in the first place. Xoserve has a perpetual license to use DDP, ensuring that the benefit customers expected from their investment in DDP functionality up to that point, was locked in for customer use indefinitely, with no increase in charges. Thus, customers continue to be able to use the system under a licence to use in the same way as, say, Microsoft Office. We will continue to be clear and transparent about the implications of investments on our services and our customers.
BUUK	Our position regarding DDP remains similar to previous years, it is within 'Opening Up Our Data' and is a tool that is useful to IGTs. Looking forward, we may explore options for similar or slightly increased requirements for DDP functionality. For example, we may require a Dashboard for MAP ID play back and potentially increased use and functionality for 'Must Reads'. This is in addition to further areas not yet discovered but under consideration from DDP workshops. Previously we found the platform costs prohibitive considering that the costs for IGTs were the same as the Shipper and GDN constituencies, irrespective of market size. Whilst these costs had been adjusted last year, the on-going costs and number of 'drops' are still unknown which provides cost uncertainty particularly considering Shippers were already on drop 6 or 7 at this time. In order for the initiative of opening data to be fully realised, grouping drops to apply to more parties would be useful to make the costs more balanced.	The transfer of ownership of DDP to Correla, outlined in the previous response, opens up the opportunity to explore alternative funding routes for developments to DDP, away from the confines of Xoserve's common funding approach. Moving forward, therefore, DDP will be made up of two components. DDP Core is licensed to customers, through Xoserve, in perpetuity and funded through normal CDSP charging methodology. It can continue to be developed by customers as part of the CDSP services and, in the first draft of BP22, we have included proposals for the ongoing expansion of DDP Core functionality through the delivery of six regular releases per annum. The introduction of DDP Prime offers a route for Correla to fund all the upfront development of additional functionality in exchange for a flat annual subscription fee, which can be spread over many years. This is an excellent example of how our new arrangements can help IGTs (and other customers) to achieve more stable cash flow profiles while still benefitting from innovation. DDP Prime also offers the opportunity for the development of bespoke functionality should customers wish to explore that option. We look forward to discussing options for IGTs in the meetings planned during the BP first draft consultation phase.
07. To what degree do you believe Xoserve should be considering investment in testing environments which more fully replicate our production systems to support robust change delivery?		
Centrica	Further information is required on how investing in testing environments will benefit Xoserve in its new role of a specialised Contract Management assurance function. A blanket approach for a testing environment may not be appropriate. Please can more information be provided as to how this would benefit customers. Each change deployed into Industry systems will have different and individual requirements. A testing budget should be allocated to monitor and review the proposed and actual costs of each Industry change to monitor this proposal and a full review would enable a decision on investment to be made.	As communicated to Contract Management Committee, the file flow issues experienced on UK Link earlier in the year were caused, in part, by the utilisation of test environments that did not fully replicate the production estate. Hence, we wanted to explore customers' appetite to consider investing in a test environment more closely aligned to the production environment, before including any costs in BP22. Subsequent work has established that the movement to cloud roadmap will already address this issue, and therefore no additional investment is included in the first draft of BP22 for testing environments.
BUUK	To the degree that there is a corresponding increase in the standard of customer experience provided relative to cost of the testing investment. If the value and efficiency of such investments can be demonstrated and adequately quantified, we would be open to exploring investments in this area.	As noted above, we wanted to explore customers' appetite to consider investing in a test environment, more closely aligned to the production environment, before including any costs in BP22. Subsequent work has established that the movement to cloud roadmap will already address this issue, and therefore no additional investment is included for this in the first draft of BP22.
08. Is there anything else Xoserve could do to support the CSS rollout or REC implementation?		
Centrica	Xoserve should ensure the API platform is fit for purpose with adequate SLAs in place. There is no available information to confirm at what level of service the CSS API will be set. We have previously highlighted that these services are critical and Basic+ is not acceptable.	We will continue to work with customers and the CSS programme participants to ensure we meet the SLAs required by the CSS programme.
BUUK	Again, further Xoserve engagement with customers and IGTs in particular to better understand our requirements regarding the CSS rollout and REC implementation.	We look forward to furthering our understanding of IGT requirements regarding the CSS rollout and REC implementation at the meetings we have scheduled with the constituency and individual IGTs.



Section One: Feedback on Consultation Questions

Customer	Feedback Provided	Xoserve Response
09. What else should Xoserve consider in support of Government or Ofgem initiatives including the Decarbonisation agenda?		
Centrica	How will these initiatives be funded by customers? Not all UNC code change is an Ofgem initiative and a broad approach to UNC change including all Ofgem and Decarbonisation may not be appropriate. Xoserve should consider that the efficiency and timeliness of change will be even more important in the transition to Net Zero to ensure the best outcomes for Industry parties and consumers.	We asked this question to understand what other centrally-driven initiatives customers might be seeking Xoserve's support with in the coming years. The funding of each investment focus area is set out in the first draft of BP22, including the allocation of costs between constituencies. We now have 3 separate pots of unallocated change budget: Decarbonisation, REC Change and General Change (for any other changes, including those driven by UNC). (For changes delivered under the DSC Change Budget, we will continue to allocate costs within year for each investment item and will manage this with customers through the DSC Change Management Committee.
10. Do you agree with our planning assumptions? Please tell us if you think we that should be adopting different assumptions when we prepare the draft Plan.		
Centrica	The efficiency of the business plan from the consumer perspective should be demonstrated. We welcome the key assumptions upon which it is proposed BP22 will be based being set out in the consultation. We agree BP22 should include only essential investment and that each Business Case should outline the quantum of any benefit identified both for customers and consumers. Some assumptions need to be revised or removed.	The investment business cases which underpin the first draft of BP22 include the benefits of each investment, including any direct/ indirect consumer benefits. Where possible we have identified the quantum of benefits for customers but, in many cases, this requires a detailed understanding of customer data that Xoserve does not have access to and which customers may consider to be confidential (e.g. internal costs). We look forward to discussing these with our customers during the consultation phase.
<i>As in BP21 we propose only to include essential investments which better reflect our customers' priorities over the next three years. These will be supported by detailed Business Cases for each focus area roadmap, to help you, our customers, to understand the cost/benefit analysis for each.</i>		
No response received to consultation question 10		
<i>Each Business Case will outline the quantum of any benefits identified both for our customers and end consumers, with emphasis on whether it drives increased Right First Time (RFT) outcomes, less Customer Effort (CE), improved On-Time Delivery (OTD) or enduring Cost to Serve (C2S) efficiencies. We will then dedicate time to provide more detailed walkthroughs and opportunities for Q&A.</i>		
No response received to consultation question 10		
<i>We will allocate funding for work driven by the agendas of Ofgem, the Retail Energy Code, Faster Switching and the Uniform Network Code, under the headings of General UNC Change and General REC Change (which will include our CSS consequential investment).</i>		
No response received to consultation question 10		
<i>As introduced in BP21, we will continue to show MTB costs as a whole, irrespective of how this is split between our own costs and those from third party suppliers.</i>		
Centrica	Assumption needs to be revised or removed. Presenting MTB costs as a whole is not transparent. As explained above, the creation and separation of Correla from Xoserve and its subsequent sale mean the information presented in the proposals need to change and be transparent. Presenting MTB costs as a whole will not allow Xoserve robustly to demonstrate the efficiency of its business plan for delivery of its role as CDSP. Also, presenting aggregate expenditure estimates will not allow stakeholders to assess the efficiency of the proposals. MTB costs need to be shown at a more granular level.	Xoserve has always presented MTB costs as a whole irrespective of how this is split between our own costs and those of third-party suppliers. Such disclosure would only deliver transparency if each third party were separately disclosed and this is prohibited by the legally-enforceable confidentiality commitments we have made. The DSC Budget and Charging Methodology, and associated customer charging statements, provide a breakdown of MTB costs allocated to service area. This represents the allocation of both direct and indirect costs to the full set of DSC services provided. We also undertook an independent efficiency review in 2018 in order to provide assurance to customers that the costs of processes were comparable with external equivalents and to feed into both BP20 and RIIO-2 price control submissions. The findings were shared with customer Contract Managers and via the DSC Contract Management Committee in October 2018. We would be happy to discuss the issues you are seeking to address with you further to identify how else we can help.



Section One: Feedback on Consultation Questions

Customer	Feedback Provided	Xoserve Response
<i>MTB costs will only change as a result of the introduction of new CDSP processes e.g. CSSC, investment savings, or the introduction/ transfer of run costs following the delivery or closure of an investment and....</i>		
Centrica	<p>Assumption needs to be revised or removed.</p> <p>Retaining this assumption will not allow Xoserve to demonstrate the efficiency of the BP22 proposals. Setting MTB costs in BP22 at the same level as they were in BP21 on a like-for-like basis does not demonstrate efficiency. This implicitly assumes MTB costs in BP21 were efficient, which has not been validated. Further, 'locking in' MTB costs from previous planning cycles prevents any efficiency gains Xoserve could make in BP22 being passed on to consumers.</p>	<p>This part of the assumption has now been superseded by the first draft of BP22, which shows the proposed profile of MTB over the next 3 years.</p> <p>We note that efficiency savings in MTB activities were reflected in the value of the sale of Correla to Northedge, which were shared with customers as a credit against charges for financial year 2021/22. As a result of liquidating these efficiency savings in this way, customers have received the benefit up front.</p>
<i>....there will be no increase to MTB as a result of the creation of Correla where scope and/ or volumes remain unchanged.</i>		
Centrica	<p>Assumption needs to be revised or removed.</p> <p>We would expect there to be a reduction in Xoserve's direct cost base because of the creation and separation of Correla from Xoserve, and its subsequent sale has resulted in a material reduction in Xoserve's direct cost base. For example, the number of employees has reduced by 400 because of the sale, which means that direct costs should materially reduce. Xoserve should present its expenditure forecasts at a sufficiently granular level to allow the efficiency of the proposals to be demonstrated.</p> <p>We accept that a portion of the expenditure consumers will be required to fund in BP22 will be costs charged to Xoserve by the sole third-party service provider. Nevertheless, Xoserve will need to demonstrate that third-party costs are also efficient. Consumers should be required to fund only efficient costs, regardless of contractual arrangements between Xoserve and third-party service providers. Market-based testing may be required to demonstrate efficiency.</p>	<p>This part of the assumption remains true.</p> <p>MTB reflects the costs to deliver the services to customers, rather than the direct cost base of Xoserve and has always included costs of third-party suppliers.</p> <p>As noted above, efficiency savings in MTB activities were reflected in the value of the sale of Correla to Northedge, which were shared with customers as a credit against charges for financial year 2021/22. As a result of liquidating these efficiency savings in this way, customers have received the benefit of efficiencies up front.</p>
<i>Consequently, cost savings in MTB promised in BP21 will not be eroded in BP22 and like-for-like MTB costs in the newly introduced Plan year of 2024/25 will remain flat relative to 2023/24.</i>		
No response received to consultation question 10		
<i>Gemini services will continue to be provided by the CDSP for the duration of the plan.</i>		
No response received to consultation question 10		
<i>Our customers have requested that we include a tranche of investment for any unallocated items in the outer years to be more representative of future investment requirements, so we will repeat this in BP22 as shown in the General Uniform Network Code Change investment focus area.</i>		
No response received to consultation question 10		
<i>We will use BP21 plus our Q1 forecast as the baseline for formal change control tracking purposes when developing BP22.</i>		
BUUK	<p>Perhaps some modification is required for this approach in light of the irregular preceding period (covid-19 pandemic), with relatively few implementations seen during this period. A contingency budget would be welcome provided it is adequate to provide scope for future projects and will allow IGTs to provision for future costs. As outlined in our response to Question 2, a mechanism could be explored whereby a contingency budget remaining at period end is reimbursed to customers.</p>	<p>In the interests of transparency, we feel it is important that we provide clear traceability to the forecast we provided in BP21 hence referring to BP21 as our cost baseline for tracking changes.</p> <p>We agree with your points regarding the irregularity of the last year and will continue to reflect an element of contingency in both the DSC Change Budget and in year 2 and 3 investment profiles. We look forward to exploring if there are further areas where you consider this would be valuable.</p>



Section One: Feedback on Consultation Questions

Customer	Feedback Provided	Xoserve Response
<i>Last year we were able to provide an indicative view of charging implications to customers at an earlier stage in the Planning cycle (September) and will continue to provide such an estimate.</i>		
BUUK	This approach is welcome, as much foresight that can be provided to IGTs in advance of the planning cycle the better.	Thank you for your feedback, we are pleased you find the approach helpful.
<i>We will continue to use CPIH as the basis for any inflation assumptions.</i>		
No response received to consultation question 10		
<i>Our cost allocation methodology for use in BP22 will continue to reflect the changes made in BP21 when we moved to the 13 customer journeys which more accurately reflect the services we provide and how we provide them.</i>		
Centrica	Assumption needs to be revised or removed. The cost allocation used for BP21 will remain relevant for BP22 only if the list of services included in BP21 remains unchanged. The removal or addition of services in BP22 necessarily means the BP21 cost allocation will need to be changed.	Thank you for your clarification. You are correct, this assumption was intended to apply to existing scope only.
<i>General comment on Assumptions</i>		
Centrica	Contradictory to the Key Assumptions, MTB costs should be split to reflect the costs of the new company structure. Customers should not be paying for Third Party Suppliers technical debt, overheads etc. Investment details should be provided to all customers without having to request this on an individual basis. These investment details should be shared and discussed in open industry meetings to allow for questions and answers from all customers and constituencies. To truly stimulate transparent debate.	MTB costs are shown in the first draft of the business plan. As noted above, Xoserve has always presented MTB costs as a whole, irrespective of how this is split between our own costs and those of third-party suppliers. We can confirm that only legacy technical debt remains the responsibility of customers; any technical debt arising since the service transferred to Correla is the responsibility of Correla. We confirm that investment details will be provided to all customers, via their Xoserve Contract Manager, with opportunity for discussion at Contract Management Committee, constituency forums and individually with Xoserve.
11. Do you think that we have identified all the significant matters that we should consider during Plan development? If not, please provide details of other items that should be considered.		
Centrica	We are concerned that there is no area of cost saving identified. Where have Xoserve identified areas to make savings? Question 3 would be more appropriately focused on customer savings and where Xoserve can assist with reduced cost and time saving for customers.	The first draft of BP22 identifies a reduction in the forecast for Exceptional Customer Experience and savings in the provision of Data Recorder Services. There are also savings to UK Link run costs from the core platform migration. We've included information in the business cases for each investment that describe the customer and consumer benefit and look forward to hearing suggestions from our customers on what additional initiatives would reduce cost and/or save time for customers.



Section Two: Feedback on Investment Focus Areas

Customer	Feedback Provided	Xoserve Response
NGN	We believe that all the investment areas continue to meet industry requirements and look forward to reading about these in more detail in BP22.	Thank you for your feedback.
EON	<p>Exceptional Customer Experience</p> <p>There were significant flow issues, which persisted through March and April 2021. There have also been other issues, which were less significant but caused challenges which as Shippers and Suppliers we had to resource FTE for the resolution of these issues. It was disappointing that we were excluded from the best resolution route and had to instead deliver a resource intensive solution. We would ask for more flexibility (which has been offered historically) in such situations as one size does not fit all.</p> <p>We are unclear why customers need to provide investment in this area and why it should not be part of MTB as it's a fundamental requirement for any business. As with many of the following points, our view may be dependent on the level of investment being requested. There needs to be quantifiable benefits associated to any recommended benefits in this area.</p>	Please see comment against consultation question 5.
NGN	<p>Exceptional Customer Experience (CMS rebuild)</p> <p>We are happy with the progress made on the CMS rebuild project and appreciate the scale of this rebuild knowing that many business processes use this system. The only concern we have is that in an effort to make the system more user friendly and appease all customers, requests for process changes are also been taken on board as part of the project however, any changes to these processes would require a MOD/ Industry Change approval and therefore there needs to be caution in making commitments in that area.</p>	Please see comment against consultation question 5.
EON	<p>Opening-up our data</p> <p>Opening up data is becoming a common theme. For this reason, we query when it will be categorised as MTB given it's one of Xoserve's fundamental priorities. It needs to be clearer as to what is an investment compared to general running costs.</p>	Please see comment against consultation question 6.
EON	<p>Gemini Roadmap</p> <p>We agree that it needs to be collaborative.</p>	Thank you for your feedback.
EON	<p>Uk Link Roadmap</p> <p>This is another investment area that has been in place for a prolonged period. We would like to know if there is a cut-off date to investment in this area and what benefits previous iterations have delivered.</p>	<p>The primary objective of the UK Link Roadmap is to ensure that this critical data processing platform is optimised and sustained to provide continued service for the UK Gas Sector.</p> <p>The investment in the UK Link Roadmap has been broken down into discreet and finite programmes to ensure transparency of how we are doing this. For example, investment in the Capacity for Change and Core Platform Migration are forecast to complete in 2023/24, while investment in UK Link Future Enhancements work is scheduled to commence in 2023/24.</p> <p>We have included details of each of these component investments in BP22 so that you can see when each investment will start and finish. We've also included details of where MTB savings will be achieved.</p>
EON	<p>Protecting against Cyber Crime</p> <p>Similarly, this investment area is becoming a recurring theme. Is Xoserve able to provide customers with a period of protection for each investment, or, with data being at the heart of its operation, will this become MTB?</p> <p>We would expect Xoserve to meet industry & legal standards regarding the cyber crime provisions it has in place but there shouldn't be a "limitless" pot of funding that delivers desirable rather than essential compliance elements.</p>	<p>As set out in the first draft of BP22, we plan to conclude most of the investment in Protecting Against Cyber Crime in 2022/23 with costs transitioning to MTB in 2023/24 and 2024/25.</p> <p>Full details of our proposal can be found in the plan and the information which will be sent to all Contract Managers in support of the BP22 first draft.</p>



Section Two: Feedback on Investment Focus Areas

Customer	Feedback Provided	Xoserve Response
EON	<p>General REC Change</p> <p>We continue to express concerns around rising CSS costs and recognise that there are challenges around forecasting them with any level of confidence.</p> <p>We reiterate previous feedback concerning greater transparency and scrutiny around these costs as we are not convinced that Ofgem appreciates the impact of ever growing and/or changing requirements.</p>	<p>The CSS programme is driven centrally and Xoserve is required to adapt to accommodate any changes to it. Throughout 2020 and 2021 we have seen further changes to our CSSC programme driven by the central industry CSS programme. These have increased both the scope of work to be delivered and paid for through the CSSC investment costs, but also in our forecast for CSSC run costs from 2023/24.</p> <p>We have included details of this increased scope and associated costs in the first draft of BP22 and the supporting information.</p> <p>As part of our consultation process on BP22, we are meeting with Ofgem and will be sure to highlight your concerns.</p>
EON	<p>General UNC Change</p> <p>We are unclear why IGT UNC costs have not been incorporated into this section.</p> <p>IGT UNC and UNC costs are more predictable so it could be queried whether these may form an MTB part of the budget.</p>	<p>We have re-named this section of the plan to General Change to reflect the wider source of change drivers, including IGT UNC.</p> <p>The Change Management rules in the DSC describe how the DSC Change Budget will be set and managed through the DSC Change Management Committee. Whilst this has been relatively stable over a number of years, this may not always be so.</p> <p>We also consider that providing the cost of delivery of UNC and IGT UNC change under investments presents the best opportunity for complete transparency of costs in this area..</p>



Section Three: General Feedback

Customer	Feedback Provided	Xoserve Response																																																												
NGN	<p>Firstly, we would like to welcome Steph and we look forward to working together to support the successful delivery of the CDSP services and industry investment areas. We are keen to see a strong relationship build between Xoserve and Correla for the seamless delivery on all focus areas and welcome new innovative ideas to achieve net-zero and 'opening data'.</p>	<p>Thank you for your feedback and your positive comments. We look forward to helping NGN, and all our customers, to benefit from the innovation that our new arrangements with Correla can bring.</p>																																																												
EON	<p>As is the case for many businesses we continue to manage the impacts of COVID19. We are also under significant pressure to drive out efficiencies to operate under a price cap regime. Despite this backdrop we have seen consistently increasing industry costs.</p> <p>The table below shows an increase of ~£15m versus the previous year and ~£80m since 2017/18.</p> <table border="1" data-bbox="240 835 1279 1234"> <thead> <tr> <th></th> <th>2017/18</th> <th>2018/19</th> <th>2019/20</th> <th>2020/21</th> <th>2021/22</th> </tr> </thead> <tbody> <tr> <td>SPAA*</td> <td>£3,824,000</td> <td>£4,075,000</td> <td>£4,109,894</td> <td>£5,942,105</td> <td>£1,682,000</td> </tr> <tr> <td>MRA*</td> <td>£10,643,026</td> <td>£14,987,366</td> <td>£14,211,363</td> <td>£14,869,747</td> <td>£6,791,900</td> </tr> <tr> <td>DCUSA</td> <td>£4,043,000</td> <td>£4,311,684</td> <td>£5,125,057</td> <td>£6,225,202</td> <td>£2,501,521</td> </tr> <tr> <td>REC*</td> <td>£0</td> <td>£0</td> <td>£4,367,000</td> <td>£9,514,000</td> <td>£21,942,000</td> </tr> <tr> <td>Elaxon**</td> <td>£41,500,000</td> <td>£43,600,000</td> <td>£53,200,000</td> <td>£52,600,000</td> <td>£83,653,035</td> </tr> <tr> <td>Xoserve***</td> <td>£16,551,000</td> <td>£19,307,000</td> <td>£35,313,000</td> <td>£44,230,000</td> <td>£41,354,000</td> </tr> <tr> <td>Total</td> <td>£76,561,026</td> <td>£86,281,050</td> <td>£116,326,314</td> <td>£133,381,054</td> <td>£157,924,456</td> </tr> <tr> <td>Total + CPIH</td> <td>£76,561,026</td> <td>£77,403,198</td> <td>£77,945,020</td> <td>£78,412,690</td> <td>£78,647,928</td> </tr> <tr> <td>Estimated variance to cap allowance</td> <td></td> <td>£8,877,852.25</td> <td>£38,381,294.17</td> <td>£54,968,363.37</td> <td>£79,276,528</td> </tr> </tbody> </table> <p>We appreciate that Xoserve's cost increases have steadied after the huge jump between 2017/18 and 2020/21 but we remain deeply concerned that some industry costs are spiralling out of control.</p> <p>Our concerns are not only a consequence of the steep rises but also relate to inconsistent challenge and governance processes afforded by each code. We commend Xoserve's engagement but across the board (industry) we are not seeing the level of feedback we would expect when reviewing multi-million-pound budgets. With regard to Xoserve, it is not evident that evidence gathered as part of the engagement process is having a significant impact on the final budget output. It would be helpful to see what elements have changed as a result of feedback towards the end of the process.</p> <p>We also want to hear more about what code bodies are doing to drive down cost, deliver efficiently and find savings, especially in a post COVID-19 world. For example, will increased homeworking and fewer face to face meetings reduce operational costs and associated expenses (travel and expenses)? What FTE savings will automation and enhanced digitalisation services deliver such as that mentioned as part of the Gemini Roadmap? When will automation manifest into benefits and savings? It's our perception that the savings created by automation are rapidly replaced by another requirement so overall savings never materialise. We would like to see evidence of the savings delivered in order to appreciate value for money and hold Xoserve to account where there is wastage.</p> <p>Finally, we would expect to see a significant decline in MTB costs for Xoserve given that many colleagues have moved over to Correla. We don't feel that it is appropriate to embed Correla costs within the Xoserve budget given the separation of both companies. We would expect transparency regarding any costs related to Correla working on behalf of Xoserve. This needs to be clearly demonstrated in the budget aligned with the approach agreed for FGO. The costs cannot just be baked in as though they are Xoserve costs. As a sub-contractor Correla's costs should be scrutinized to ensure a.) that value for money is delivered and b.) that there isn't cross-subsidisation of its independent commercial activity.</p>		2017/18	2018/19	2019/20	2020/21	2021/22	SPAA*	£3,824,000	£4,075,000	£4,109,894	£5,942,105	£1,682,000	MRA*	£10,643,026	£14,987,366	£14,211,363	£14,869,747	£6,791,900	DCUSA	£4,043,000	£4,311,684	£5,125,057	£6,225,202	£2,501,521	REC*	£0	£0	£4,367,000	£9,514,000	£21,942,000	Elaxon**	£41,500,000	£43,600,000	£53,200,000	£52,600,000	£83,653,035	Xoserve***	£16,551,000	£19,307,000	£35,313,000	£44,230,000	£41,354,000	Total	£76,561,026	£86,281,050	£116,326,314	£133,381,054	£157,924,456	Total + CPIH	£76,561,026	£77,403,198	£77,945,020	£78,412,690	£78,647,928	Estimated variance to cap allowance		£8,877,852.25	£38,381,294.17	£54,968,363.37	£79,276,528	<p>Thank you for your feedback. We appreciate that there is industry concern about the level of central body costs and we are happy to provide some further commentary about Xoserve's costs. Obviously, we are not able to comment on the costs of other central bodies.</p> <p>Since 2017/18 we have seen a significant number of material increases in our scope of activity, including:</p> <ul style="list-style-type: none"> • Increase in reporting and engagement requirements as a result of FGO/ creation of DSC. • Introduction of the annual business planning consultation process in 2017 which, while valuable, is extremely labour-intensive. • Inclusion of support for IGTs as a constituency, where they previously operated independently. <p>Further:</p> <ul style="list-style-type: none"> • We were previously sized to support only the Gas Transporters with the level of service we provide all customers today. • Transfer of responsibility for our internal IT, Security, Finance and HR systems, administration personnel and processes, previously provided by National Grid for a nominal fee. • We previously had a fully automated switching regime, that changed rarely. We now engage with multiple parties in a more complex web of commercial relationships, with additional capacity for change required and a different operational regime to interface with. <p>In addition: new digital interfaces (e.g. APIs and web forms) cannot fully replace telephone and manual services yet, as it will take time for all customers to be equally placed to consume a fully digital service. We note that the volume of calls and queries we process per annum has actually increased since 2017.</p> <p>Our work to date on automation has offset some of these increases in scope, but the complexity of the work we do and the market in which we do it continues to increase. We also note that some of the automation we have introduced leads not to reduced workload for Xoserve but for our customers (e.g. Gemini automations benefiting National Grid). From BP21, we started to highlight where a reduction in customer effort was the primary benefit, as a sign-post for our customers to undertake their own cost review.</p> <p>In BP21, we started to show MTB on a like for like basis, with savings and scope changes shown separately, for transparency. We will continue to do this in BP22, but we note that many savings being delivered by investments already in progress were reflected in the value of the sale of Correla to Northedge, which were shared with customers as a credit against charges for financial year 2021/22. As a result of liquidating them in this way, customers have received the benefit up front.</p> <p>The benefit of any further investment in automation will be agreed with customers at the time customers are asked to agree the investment. We commit to share what elements have changed as a result of feedback received during the consultation process for BP22. Each version of the business plan will include a description of what has varied and how we have responded to customer feedback. We typically amend proposals where there is broad agreement to do so from across our customer base. We will continue to work on engaging customers to improve this part of the process and would welcome further dialogue on this point at DSC Contract Committee as each version of the BP22 is published.</p> <p>Finally, with regard to Xoserve's supply chain, we have always used third parties in the delivery of services and the cost of these have always been included within the MTB budget. This will continue, reflecting that commercial arrangements with suppliers are subject to legally binding obligations of confidentiality.</p>
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Section Three: General Feedback

Customer	Feedback Provided	Xoserve Response
Centrica	<p>Regulatory requirements and the sale of Correla mean the approach to and process for developing CDSP business plans necessarily needs to be changed</p> <p>There are two main developments within the last year that mean the process for developing CDSP business plans necessarily needs to be changed:</p>	<p>Please see below for comments on the specific points.</p>
Centrica	<p>Regulatory requirements:</p> <p>As a result of the issues raised in our appeal of the 2020/21 Business Plan (BP20), Ofgem has encouraged Xoserve and industry to work together to implement process improvements to ensure the budget setting process is robust and ultimately operates in the interests of consumers. Key issues highlighted by Ofgem include:</p> <ul style="list-style-type: none"> • the designation of a proposed service as a CDSP Service, • enhanced external challenge/reporting on the draft CDSP Budget, and • a dedicated Board assurance statement setting out how the Board has assured itself that the proposals are in the interests of Xoserve’s customers and consumers. None of these issues is explicitly addressed in the consultation. <p>We welcome Xoserve’s continued support in developing a UNC modification that seeks to address the key issues Ofgem raised by, for example, providing for independent scrutiny of the proposed business plan. Steps could be made ahead of implementation of the modification that would make the BP22 process more robust. Producing a dedicated Board assurance statement setting out how the Board has assured itself that the business plan is in the interests of Xoserve’s customers and consumers is one such step: this would provide stakeholders with reassurance that the Budget and associated costs have been tested for accuracy, ambition and efficiency, and the expenditure forecasts included in the Budget are robust and efficient.</p> <p>Also, if it is anticipated new services will be delivered during 2022/23, Xoserve should ensure it engages with industry to determine whether the new services meet the criteria to be designated as CDSP Services. Xoserve should utilise the existing mechanism to designate accordingly within the DSC and relevant subsidiary documents. A service is not automatically designated as a CDSP Service because it has been proposed in a draft of the business plan.</p>	<p>In response to the appeal raised in 2018 regarding BP20, we have committed to make a number of further improvements to our business planning process.</p> <p>Firstly, we will make clear how each investment proposed in BP22 links to the DSC Service Areas (and thus the CDSP Services) and, for any new investments, we commit to articulate the basis on which we have assessed the investment to be either a CDSP Service or required to facilitate the efficient delivery of CDSP Services. As you will see from the first draft of BP22, we are not currently planning to make any new investments in the BP22 period and those already in progress are related to maintaining or improving CDSP service lines.</p> <p>Secondly, we will continue to engage with customers by constituency, individually and through the DSC Contract Management Committee, answering questions and providing supporting detail to enable customers to engage effectively in the process.</p> <p>We are also continuing to work both with the team at Centrica and the Joint Office of Gas Transporters to support the progression of the UNC modification raised by Centrica which seeks to enhance external challenge of the draft Business Plan by strengthening end-consumer representation.</p> <p>Thirdly, once the business planning process has been concluded, and reflecting Xoserve’s new organisational focus on the assurance of service delivery, Xoserve’s Board will provide an Assurance Statement setting out how the Board has assured itself that the Business Plan is in the interests of Xoserve’s customers and consumers.</p>



Section Three: General Feedback

Customer	Feedback Provided	Xoserve Response
Centrica	<p>The creation and separation of Correla from Xoserve and its subsequent sale:</p> <p>Condition A15A of the gas transporters’ Standard Licence Conditions and the Data Services Contract (DSC) were implicitly drafted on the basis of Xoserve being the service provider. The creation, separation, and sale of Correla means that Xoserve’s focus has shifted to contract management and assurance, and services will be bought in from a single third-party provider. These changes mean information supporting proposals needs to change and the approach to deciding how, and by whom, investment should be funded needs to be explained. None of these issues is explicitly addressed in the consultation.</p> <p>It is necessary for Xoserve to provide further detail on its shift away from being a direct service provider to contract management and assurance, and the associated impacts on its customers and consumers. Key issues that need to be resolved to enable stakeholders to develop informed views of the proposals for BP22 include:</p> <ul style="list-style-type: none"> • The extent to which assets transferred to Correla will be used exclusively for the delivery of CDSP Services. • The basis for funding and cost recovery of investment in assets needed to deliver CDSP Services but which have been transferred to Correla. This would include detail on multiyear projects that were in-flight at transfer such as Data Discovery Platform and the Customer Relationship Management System. • The extent to which consumers should be required to fund investment delivered by Correla when those assets may also be used by Correla to deliver services beyond those needed by the generality of consumers or unrelating to any obligation in the UNC. For example, an equitable approach to cost apportionment will be required if the core functionality of the Data Discovery Platform (DDP) could be used also to deliver DDP Prime (‘unregulated’) services. • Any non-zero value of the margin included in CDSP charges needs to be robustly justified and well-evidenced given the shift away from service provision to contract management and assurance. 	<p>The creation and sale of Correla does not change Xoserve’s responsibility and accountability for delivery of the CDSP services under license condition A15A of the Gas Transporters Standard License Conditions.</p> <p>Xoserve has always outsourced elements of service provision and the creation and sale of Correla continues and deepens this service delivery approach, while offering a step change for the industry as customers can benefit from being able to explore commercial opportunities through direct engagement with Correla which Xoserve, as CDSP, is not able to contemplate.</p> <p>Xoserve will now focus on contract management and assurance of service delivery, for the benefit of customers. Previously undertaken ‘in house’, the independence that Xoserve can now bring to performance and requirements fulfilment assurance, audit, risk management and quality enables us to act on customers’ behalf without the inherent conflict of also being the organisation doing the delivery, to ensure the service meets code requirements and the commitments in the Data Services Contract (DSC). The arrangement is augmented by the availability of commercial levers in our flow down contract with Correla (known as DSC+), which Xoserve’s funding, governance and ownership arrangements has precluded us including in DSC and which incentivise performance to customers while allowing Xoserve to take meaningful corrective action, on behalf of customers, if needed.</p> <p>As communicated earlier this year, the intellectual property and associated software licences relating to both the Data Discovery Platform (DDP) and Customer Relationship Management system (CRM) transferred from Xoserve to Correla as part of the creation of Correla. This ensured that Correla was set up to be able to provide services directly to customers beyond the narrow confines of CDSP services (which it provides to Xoserve, for the benefit of customers under DSC+), thus opening up the opportunities for innovation which inspired the restructure in the first place.</p> <p>Customers continue to be able to access the capabilities of both DDP and CRM. Xoserve has a perpetual license to use DDP, ensuring that the benefit customers expected from their investment in DDP functionality up to that point, was locked in for customer use indefinitely, with no increase in charges. Thus, customers continue to be able to use the system under a licence to use in the same way as, say, Microsoft Office. CRM will now be provided at Correla’s cost, reflecting that is would be usual to expect an outsourcing service provider to fund a CRM to underpin service level and customer satisfaction performance.</p>
Centrica	<p>Greater transparency is needed</p> <p>We would also like to provide some comments on the continuous improvement we expect in the development of the Business Plan. The granularity of cost information is important, and it is necessary to provide the detail on how the cost base is comprised. A clear comparison to the current plan is necessary for transparency. All customers should be able to understand, at a granular level, how spending is changing from the current year. Explanations should be provided for the approach taken and all funding splits allocated.</p> <p>We are pleased to see the inclusion of Business Cases to be provided as standard to the Contract Management Committee for all proposed investments, however we believe these Business Cases should be shared with all customers to enable a transparent process.</p> <p>Once again, we would like to encourage Xoserve to publish in full all consultation responses (unless marked as confidential) and address each matter raised specifically. It is this transparency that will have the greatest impact in driving conversation and engagement with industry. The introduction of the produced ‘Differences’ paper was incredibly useful to summarise the changes between drafts: this document, along with clear details of where the plan has been amended, with justifications presented to Contract Management Committee to explore the criteria for how these decisions are made and deliver detailed descriptions of the approach taken to arrive at individual decisions, will be essential in increasing industry engagement and will provide greater transparency.</p>	<p>We will continue to deliver greater transparency, including cost comparisons between both different Business Plans and year on year costs and investments to ensure comparisons can be drawn and transparency can be maintained. To that end, we have based BP22 on the same structure and investment focus area to provide consistency between business plan years and have included funding splits for all investments.</p> <p>As an improvement to this year’s process and as a result of your feedback we will issue the supporting business cases to all Contract Managers rather than on request.</p> <p>We are also planning to publish in full all consultation feedback, unless marked confidential, along with our responses. Those received in the draft Principles and Approach are contained in this document.</p>

