

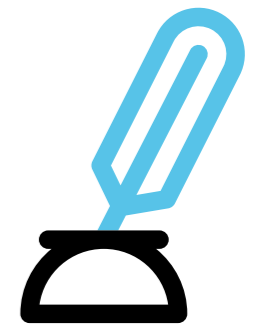
xserve



**2022 Business Plan**  
Final Draft

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In July 2021, we published the Principles and Approach for our 2022 Business Plan (BP22), which marked the formal start of our annual process to engage with our customers on the strategic priorities of Xoserve, and to seek feedback on the initiatives we believe will deliver the greatest value during the period April 2022 to March 2025.

We subsequently issued the first and second drafts of BP22, consolidating the customer feedback we received and outlining our financial forecasting, investment focus areas, customer engagement approach and constituency-specific information for consideration.

This final draft reflects specific feedback on scope and/or investment requirements received during the customer consultation periods and includes an expanded explanation of MTB budget in response to requests for more transparency in this area.

As set out in our Principles and Approach document, we have categorised our investment proposals within five core focus areas that represent the CDSP Service priorities for the upcoming business plan period:

- Exceptional Customer Experience
- Opening-Up Our Data
- Gemini Roadmap
- UK Link Roadmap
- Protecting Against Cyber Crime

In addition, there are three focus areas which capture work driven by BEIS/Ofgem, the Retail Energy Code (REC) and the Uniform Network Code (UNC):

- Decarbonisation
- REC Change
- General Change

We've chosen to remain consistent with the approach taken in BP21, optimising the list of investment themes to provide a clear and simple framework for demonstrating investment value and the way in which this value will be measured.

The financial information in this document describes the purpose of the funding, provides transparency within the bounds of commercial confidentiality obligations and gives a breakdown, by customer constituency, of funding contributions. You will also find the rationale and plan for activities in each of the investment focus areas, along with a breakdown of investment activities, incorporating customer feedback from both BP21 and the most recent consultation period. Each focus area continues to be underpinned by a detailed roadmap (outlined in a presentation) and a business case. Updated versions of these, reflecting the changes outlined on page 8, will be issued in due course.

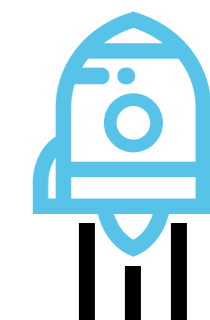
After the first draft of BP22 was published, Customers requested more information on CMS. We shared a business case containing further detail and options in early November which was presented at DSC Contract Management Committee (CoMC) on 17th November. This gave rise to additional questions so we will provide more information at the 15th December CoMC to enable further discussion. At this meeting customers will be able to choose their favoured option. While we do not yet know which option will be chosen, we have assumed that customers will favour the "subscription model" option as it represents optimum value. On that basis, the CMS costs in this final draft are based on the costs and funding profile of the subscription model. Consequently, these costs are shown as additions to MTB from 2023/24. If the investment funded option is chosen by customers instead, a revised Final Draft of BP22 will be issued to reflect this.

Since publishing the first draft we have also continued to work with RECCo to firm up the requirements for the Gas Enquiry Service (GES) and understand the requirement for a possible third major release each year. It is now clear that we will not have sufficient certainty to be able to quantify costs until after BP22 is finalised. Therefore, we have assumed that any activity before 2023/24 will be funded via the DSC Change Budget.

Commencing with the first draft of this Business Plan, we have continued to build on the step change in customer engagement activities introduced in the planning process for BP21, providing more granular information to customers earlier in the process and sharing detailed roadmaps to clearly set context for the investment areas. We continued this engagement following publication of the second draft, holding follow up sessions with each of the customers who provided feedback on the first draft. We will publish our responses to feedback on the second draft shortly, reaching out individually to those customers who commented to follow up.

This final draft of BP22 will be presented to the Xoserve Board for approval in January 2022. Once approved this will form the final version of Xoserve's Business Plan. The Xoserve Board will also issue a Board Assurance statement which sets out how they have been engaged with the business planning process and how they have assured themselves that the Business Plan represents what is required to deliver the CDSP Services and meet customer requirements. The final version of BP22, incorporating the Board Assurance statement, will be published on Xoserve.com before the end of January 2022.





# Executive Summary

Our 2022 Business Plan (BP22) aims to recognise the challenging environment in which our customers continue to operate, as we contend with the impacts of the COVID-19 pandemic. As in our 2021 Business Plan (BP21), we have worked to present a plan which provides stability and value for money for the CDSP services and focuses on the investment areas that our customers have told us are important, which are required to sustain the CDSP services and/or which deliver industry change. We have maintained and, in some cases, exceeded the financial promises made through BP21, with BP22 Totex for 2022/23 now forecast to be £4.8m lower (£83.2m in BP21 vs £78.4m in BP22). Figure 01 shows the Totex values for the current and three year plan period.

## Investment Overview

The investment areas within BP22 remain consistent with those in BP21, with the exception of Decarbonisation which is now separated from General Change. We have set out where value in these investments has been delivered and where further value will be provided through the proposed investment roadmaps.

We have outlined areas where our new arrangements with Correla will benefit customers, leading to reduced investment costs to customers when compared to those previously set out in BP21.

We have also included costs for the replacement of the Contact Management Service (CMS) of £1.5m in 2023/24 and £1.1m in 2024/25. As noted in the introduction, these values assume that customers will follow our recommended option to benefit from up front investment from Correla, allowing the service to be consumed on a subscription basis.

## CSS Programme

In the first draft we asked for customer views on the inclusion of a contingency sum (suggested value £2.5m) to cover areas of significant risk and ambiguity in the CSS programme. We did not receive support for this proposal and therefore will continue to show the investment cost forecast for CSS at £8.5m. No further feedback was received on this as part of the second draft consultation.

Following the further elaboration of service requirements by RECCo, the latest forecast for run costs has been increased to £0.5m from the BP21 position of £3.4m to £3.9m in BP22.

## MTB Summary

### MTB baseline

In both BP20 and BP21 we forecast that baseline Maintain the Business (MTB) costs would reduce in 2022/23 and 2023/24, on a like for like basis, for those years. This profile has been maintained in BP22 with £51.8m in 2022/23 and £51.1m in 2023/24.

### MTB Scope changes

Since the publication of BP21, we have identified areas of scope change for services funded by MTB as described in the financial forecasts section of this document. This final draft does not contain any further scope changes since the publication of the second draft of BP22.

### MTB reclassifications from Investment

In BP21, we reclassified the costs of a number of services from Investment to MTB due to their enduring nature. We also highlighted to customers that services delivered under the Timely and Open Data investment would be reclassified in this plan for the same reasons. We received feedback from customers in the first consultation that they would prefer costs associated with the Data Discovery Platform (DDP) core releases element (£0.3m in 2023/24 and 2024/25) to remain in investment and therefore we amended the second draft accordingly and the position is unchanged in this final draft.

These reclassifications have no impact on Totex.

### Information Security

Over recent years we have made significant investments to secure our data and build levels of protection against the risks of Cyber Crime, whilst ensuring our ability to comply with Data Privacy laws and regulation. MTB in BP22 reflects the Information Security run costs of £2m from 2023/24 onwards resulting from the investments in this area.



Figure 01 - Totex values for the current and three year plan period.

Based on the meter point count as at 1st December 2021, Totex for 2022/23 equates to a cost per meter point for each constituency as follows:

- **DNs: £1.10** (£1.11 if Specific Services are included)
- **IGTs: £0.31**
- **Shippers: £1.30** (£1.44 if Specific Services are included)

This compares to an average gas bill between April 2020 and April 2021 of £593.79, based on:

- Average annual gas usage for a medium user in the UK is 12000kWh (based on 12 months from April 2020).
- Average p/kWh for gas in the UK of 4.17p
- Average annual standing charges of £93.39

Source: <https://energysavingtrust.org.uk/about-us/our-data/>



# Customer Feedback

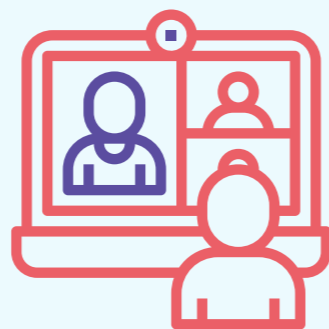


We have engaged with

**72**  
individuals...



... across  
**24**  
meetings...



... and  
**37**  
different customer organisations...



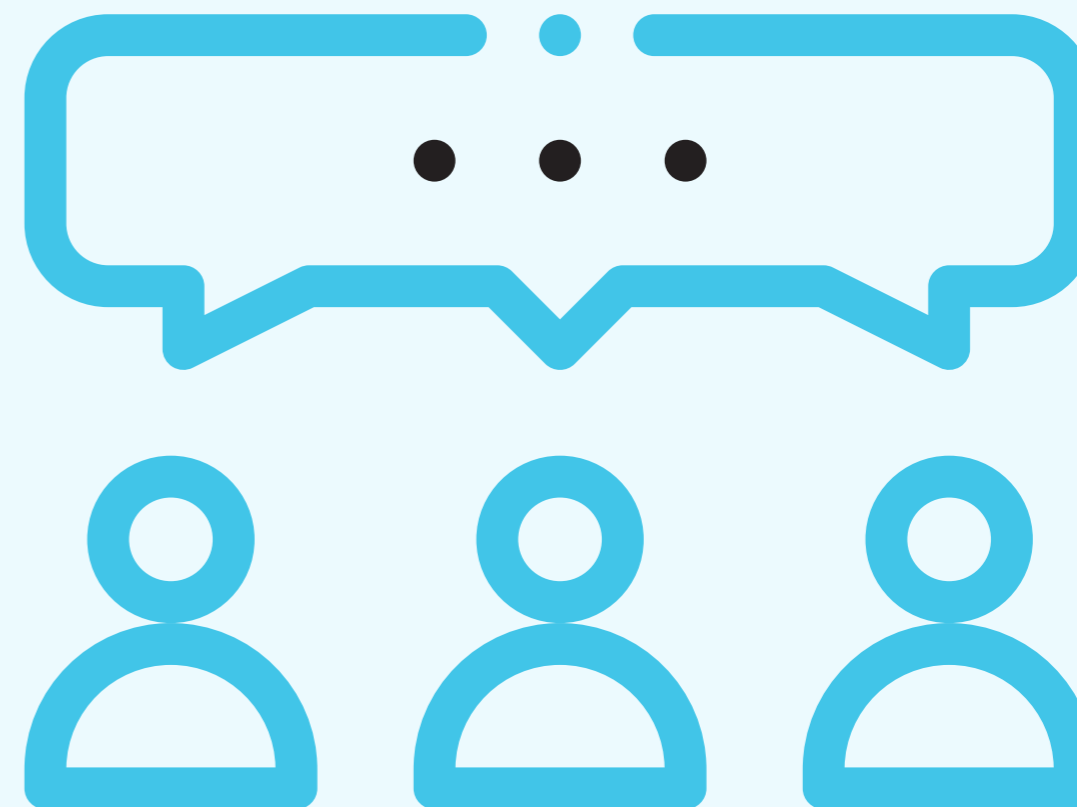
... with supporting information issued to  
**165**  
recipients!

In the first draft of BP22, we invited customers to respond to five questions and provide feedback on the investment and change initiatives that we included in the draft plan. We also spoke to a wide range of customers to discuss the impact of our Business Plan on their organisations. A consultation response was published responding to the feedback we received, and we engaged directly with each organisation who sent in a formal consultation feedback.

We published our second draft on 29th October and invited customers to provide any further feedback based on that draft. We'd like to thank those customers who engaged with us either in conversation or via the provision of formal feedback during the process.

A second consultation response will also be published responding to the feedback that we received on the second draft; this document and the original feedback received will be available on our [website](#).

Further details on our engagement approach can be found on page 34.





# Key Changes in Final Draft

# Financial Information

Following customer feedback, we have made the following changes in the final draft of BP22:

- We have included more detailed information on Maintain the Business expenditure.
- Where possible, we have included more information on the consumer benefits enabled by each investment focus area. Noting these are based on a number of assumptions and that these benefits will be passed onto consumers by our customers.
- Gemini Sustain investment has been amended at the request of National Grid.

As in both the first and second draft, contingency for any further delay within CSSC has not been included in this Business Plan. Consequently, in the event that there are any substantive delays to current programme timelines Xoserve may need to make a further funding request to customers within the life of the Business Plan.

We have summarised below the changes made at each stage of the consultation process. The subsequent impacts on customer charges are highlighted in the relevant constituency sections at the end of this document.

Totex (£m)	Classification	2022/23	2023/24	2024/25
<b>First Draft</b>		<b>79.8</b>	<b>82.6</b>	<b>82.6</b>
Decarbonisation	Investment	(1.2)	(1.2)	(1.2)
Gemini Regulatory Change	Investment	(0.0)	(0.0)	(0.0)
CMS Decommissioning	MTB	-	0.2	-
Unallocated Investment	Investment	-	(0.2)	-
FWACV	MTB	-	0.1	0.1
<b>Second Draft</b>		<b>78.6</b>	<b>81.4</b>	<b>81.5</b>
Gemini Sustain	Investment	(0.1)	0.5	-
<b>Final Draft</b>		<b>78.4</b>	<b>81.9</b>	<b>81.5</b>

Figure 02 - impact on Totex (where relevant) of the changes detailed above (additions may be impacted by roundings)

## Provision of Financial Information

In this section we describe the basis of our financial forecasts and how we are presenting financial information to our customers. Wherever possible we have retained the format and structure of our financial information in line with last year's plan to help customers see what's new and what has changed.

The financial information in BP21 was stated at 2020/21 prices. To allow a direct comparison with the values in BP22, we have restated all values shown in BP21 inclusive of the 'Consumer Prices Index including owner occupiers' housing costs' (CPIH) uplift of 2.0% which was applied to BP21 to create the charging statements in January 2021. CPIH indexation will be used again to convert the finalised BP22 numbers into Charging Statements for 2022/23.

In BP21, we showed MTB costs as a whole, irrespective of how this is split between our own costs and those of third-party suppliers, and this will continue in BP22. Investments in BP22 will continue to be categorised by focus area.

## Presentation of Financial Information

The financial information in the following sections is presented in line with the focus areas outlined in our Principles and Approach. Costs have been allocated to the relevant customer constituency for each investment focus area. This fulfils three objectives:

1. It differentiates between funding that:
  - a. Maintains the business (known as MTB), supporting the high-quality assets necessary to deliver our services.
  - b. Delivers the investments to meet customer requirements. Our investments have been split by:
    - i. Focus areas as specified within the Principles and Approach document with only essential investments being proposed.
    - ii. An unallocated investment pot for years two and three of the Plan that reflects the customer view that a flat level of investment across the Plan period represents a more realistic view of future investment levels.
2. It is transparent about the initiatives being funded to deliver our previously stated strategic goals and builds upon BP21 to continue investments in critical systems and solutions needed to deliver CDSP services.
3. It provides a breakdown, by customer constituency, of their contribution to the plan by showing the breakdown of constituency costs for each investment (the investment funding split) and compares the total for each investment area against previously approved Business Plan figures (BP21). We have also shown any impacts resulting from investment costs being reclassified to MTB or consequential MTB costs when projects have ended.



# Financial Forecast

## Total Expenditure

Figure 03 illustrates proposed BP22 Totex and compares to the equivalent values in BP21. This is made up of costs required to maintain the business (MTB) and deliver investments considered essential, in order for the CDSP services to support our customers in the context of the future direction of the energy market.

The main reasons for the changes to the investment profiles between BP21 and BP22 are:

- The re-profiling of spend on the Gemini Roadmap, resulting in a £4.1m reduction in 2022/23.
- Increased Gas Distribution Network (GDN) investment in Decarbonisation from £1.5m to £1.8m a year to accelerate activity and create capacity for additional scope and requirements.
- The transfer into MTB of Information Security run costs, previously classified as investment in BP21, from 2023/24 onwards. This recognises the conclusion of this four year investment programme.

In BP21 we reclassified several activities, which had become mainstream and operational in nature, from investment to MTB. We also highlighted to customers that work currently classified under the Timely and Open Data investment area associated with the Provision of Demand Estimation data was also enduring in nature and would be reclassified as part of BP22 from 2022/23 onwards. Based on customer feedback received, costs for DDP core releases will remain in investment.

As a reclassification, this change has no impact on TOTEX.

MTB expenditure represents the cost of providing the central data services. We promised in both BP20 and BP21 that we would reduce our baseline MTB costs year-on-year, on a like for like basis, for those years. This profile has been maintained in BP22.

There have been several scope changes to the services funded by MTB since the publication of BP21, however, specifically:

- At the request of customers we included new functionality to run a messaging service (Twilio) to allow communication to end users (+£0.1m).
- Increased Allocation of Unidentified Gas Expert (AUGE) and Performance Assurance Framework Administrator (PAFA) costs as a result of re-tendering for these activities and to cover additional scope requested by Performance Assurance Committee. (+0.2m).
- The decommissioning of the Data Recorder Service. This data will be sourced from smart meters in the future and this service will cease during 2022/23 (-£0.15m) and 2023/24 onwards (-£0.3m).
- From 2022/23 Xoserve will be responsible for delivery of the FWACV service to customers. The run costs of £0.07m will be funded through the Change Budget in 2022/23 and are included in MTB from 2023/24 onwards.

In addition, and shown separately:

- As a result of further changes to the Industry Central Switching Service (CSS) programme, assumptions to MTB run costs for Central Switching Service Consequential (CSSC) have been increased by £0.5m a year from the values stated in BP21.
- As highlighted earlier in this section run costs for Information Security are transferred into MTB from 2023/24 onwards
- The initial estimate of run costs associated with the CMS replacement have been included from 2023/24 onwards.

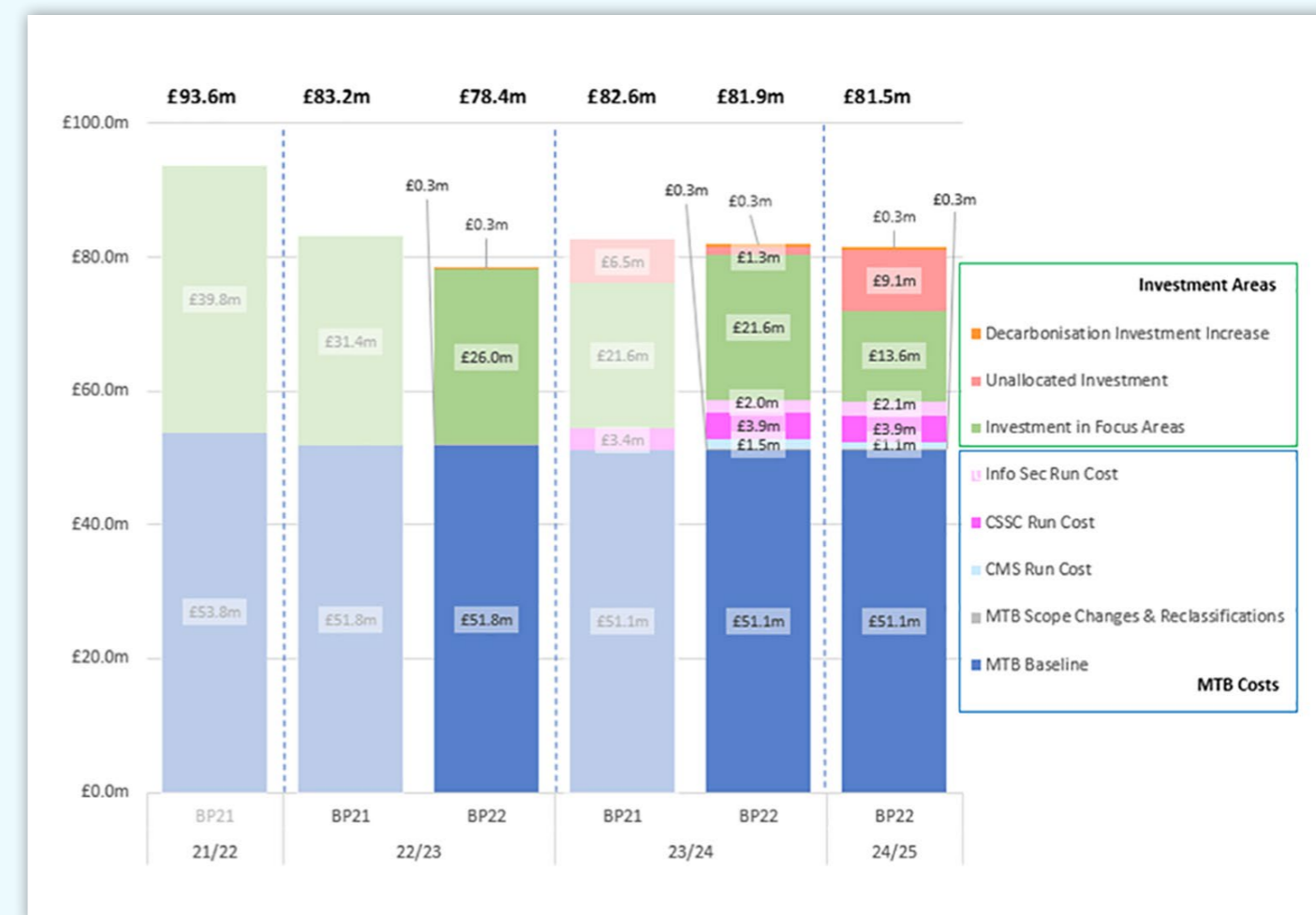


Figure 03 - proposed BP22 Totex compared to BP21



# Maintain the Business

## Context

Our Maintain the Business (MTB) budget represents the cost of delivering the Central Data Service Provider (CDSP) services, under the terms of the Data Services Contract (DSC).

The majority of the services we provide are delivered under the DSC, an agreement between our customers, Great Britain's Gas Transporters, Independent Gas Transporters (IGTs) and Shippers which, among other things, sets out the services that we deliver as the Central Data Service Provider (the CDSP Services). These are documented in the CDSP Service Description.

At a high level, these services centre around the custodianship and maintenance of the central register of the 24 million gas meter points in Great Britain, which includes address, meter details, supplier and read history. Xoserve offers a mutualised, centralised service to all gas market participants to ensure that data about gas use and supply is transported, processed, exchanged and updated securely, creating a single, consistent source of information across the industry. From this central register we identify which companies are responsible for gas entering and leaving the network, which lets it remain 'in balance' between supply and demand, and invoice for/provide information to the gas transporters.

Each year as the CDSP we process:

- Around 3 million customer switches
- Over 1 billion meter reads
- More than 1 million changes of gas meter details, with volumes expected to grow significantly with the roll-out of smart metering
- Around £4 billion in invoices for gas transportation

The central register and its related information flows demand sophisticated computer networks, with highly skilled people to support reliable and efficient delivery of these critical services. MTB expenditure funds the costs of the people, systems and support costs for Xoserve and its service providers to meet the requirements of the CDSP Services.

Delivering this centrally, in a mutualised way, enables consistency of approach, economies of scale and sharing of costs across the gas industry. This approach has allowed Xoserve to respond to unexpected events on behalf of the gas market, such as the recent run of market participant failures, in the most expedient way.

## Year-on-Year Movements

For BP22 Figure 04 shows the year-on-year MTB movements in costs (in £m) from the approved levels as at April 2022 through to March 2025 and identifies the drivers for each movement. Figure 05 compares MTB components in BP22 against those in BP21.

- The MTB scope changes increase costs by +£0.1m in 2022/23 whilst the costs reclassified into MTB add £0.2m. In 2023/24 the scope increases and reductions are broadly neutral.
- Benefits from our Exceptional Customer Experience (-£1.0m) and Maintaining and Improving our Services (-£1.0m) initiatives highlighted in both BP20 and BP21 will be realised in 2022/23.
- UK Link savings (-£0.7m in 2023/24) are the annual benefits from core platform migration to cloud.
- Information Security run costs have been included from 2023/24 as the investment initiatives complete (+£2.0m in 2023/24 then and additional +£0.1m in 2024/25) as the activities move into business as usual.
- CSSC run costs have been updated from the BP21 position (+£3.4m) based upon changes in requirements driven by the Industry CSS programme (+£0.5m). £3.9m in total.
- The initial estimate for CMS run costs are included (+£1.5m in 2023/24 +£1.1m in 2024/25).
- From 2022/23 Xoserve will be responsible for delivery of the FWACV service to customers. The run costs of £0.07m will be funded through the Change Budget in 2022/23 and are included in MTB from 2023/24 onwards.

The values above are an overall position to the Business Plan. We have detailed the impact to each customer constituency in the Customer Constituency Funding section at the end of this document.

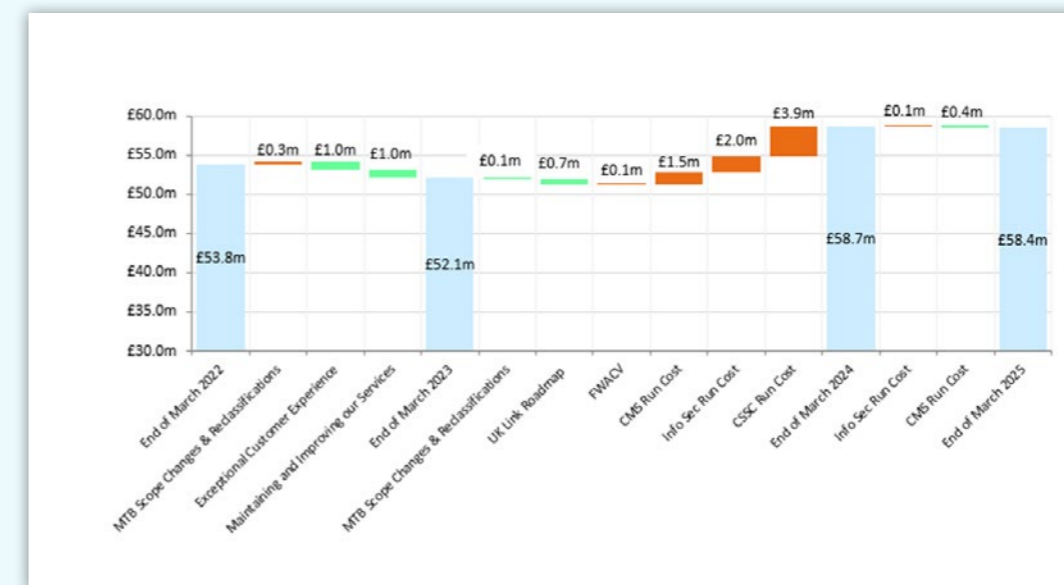


Figure 04 - year-on-year MTB movements in costs (in £m) from April 2022 through to March 2025

Note – March 2022 value consists of the MTB baseline from BP21 for 2021/22 (£51.5m) and the reclassifications from Investment to MTB (£1.2m). The total of £52.7m is then increased by CPIH (2%) to get to 2021/22 prices.



Figure 05 - comparison of MTB components against BP21



# Maintain the Business

## Breakdown of Charges

In response to feedback requesting greater transparency and granularity of MTB charges, we have included in this final draft of BP22 a breakdown of how these charges are allocated across the CSDP services.

The CDSP Services funded by MTB fall into three broad categories:

- **General Services:** split into 13 Service Areas, comprising a total of 450+ Service lines between them, which represent our day to day CDSP activities under the DSC Contract. There are 2 further Service Areas to cover Gemini activities and the Data Discovery Platform (DDP). Together, these 15 Service Areas account for approximately 92% of MTB costs and are invoiced on a monthly basis.
- **Specific Services:** these are optional services not covered as part of General services such as IX annual maintenance and access to Data Enquiry Service (DES). These account for approximately 7% of the MTB numbers and are invoiced based on use.
- **Additional and Third-Party Services:** these are services provided to non-DSC customers such as Meter Asset Managers (MAMs) and Housing Associations. These account for the final 1% of the MTB numbers and are invoiced to the relevant organisation based on use.

At the end of January each year, once the Business Plan has been approved by the Xoserve Board, we generate a Charging Statement, which sets out the charges each customer constituency can expect to pay towards the delivery of General Services, Change charges and Investment charges for the coming financial year (2022/23). In addition, the Charging Statement sets out the price list for Specific Services.

We have included a version of table 1 of the General Services part of the Charging Statement for 2022/23 on the next page (figure 06) to show how the numbers in this final draft of BP22 are allocated across the 15 Service Areas, along with estimated totals for Specific Services and Additional/Third Party Services.

The total MTB charges shown in figure 06 reconcile to the MTB elements (both baseline and scope changes, reclassifications and run costs) shown in the Customer Constituency Funding section of this document.

Service Area no.	Service Area	Annual Service Area Charge	Shippers	National Grid NTS	DN Operators	IGTs	Other
1	Manage Shipper Transfers	1,357	1,357	-	-	-	-
2	Monthly AQ Processes	1,040	1,040	-	-	-	-
3	Manage Updates to Customer Portfolio	3,804	3,424	-	380	-	-
4	Meter Read/Asset processing	1,065	352	-	714	-	-
5	Demand Estimation Obligations	1,806	903	-	903	-	-
6	Customer Relationship Management	3,009	1,896	256	764	93	-
7	Customer Joiners/Leavers (UK Gas Market)	845	-	422	422	-	-
8	Energy Balancing (Credit Risk Management)	1,128	-	1,128	-	-	-
9	Customer Reporting (all forms)	1,755	597	123	923	112	-
10	Invoicing Customers	7,538	-	905	6,633	-	-
11	Management of Customer Issues	734	293	37	360	43	-
12	Customer Contacts	2,748	1,374	165	1,077	132	-
13	Managing Change	13,770	7,160	964	5,508	138	-
14	Gemini Services (General)	5,734	-	5,734	-	-	-
15	Value Added Services (General)	1,734	1,387	-	309	38	-
	<b>Total General Services Charge</b>	<b>48,067</b>	<b>19,783</b>	<b>9,733</b>	<b>17,994</b>	<b>557</b>	<b>-</b>
	<b>Total Specific Services Charge</b>	<b>3,627</b>	<b>3,488</b>	<b>-</b>	<b>139</b>	<b>-</b>	<b>-</b>
	<b>Total Additional/3rd Party Charge</b>	<b>439</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>439</b>
	<b>Total MTB Business Plan 2022</b>	<b>52,133</b>	<b>23,271</b>	<b>9,733</b>	<b>18,134</b>	<b>557</b>	<b>439</b>

Figure 06 Draft MTB charges by Constituent for General Services, Specific Services and Additional/Third Party Services.

For the avoidance of doubt, these charges are shown at 2021/22 prices and, in line with our assumptions in the BP22 Principles and Approach document, will be uplifted using CPI-H as at December 2021 to create the final Charging Statement in January 2022.





# Investment Area Focus

## Investment Overview

In line with our Principles and Approach document we have categorised our investment proposals within focus areas that represent our priorities for the upcoming business plan period.

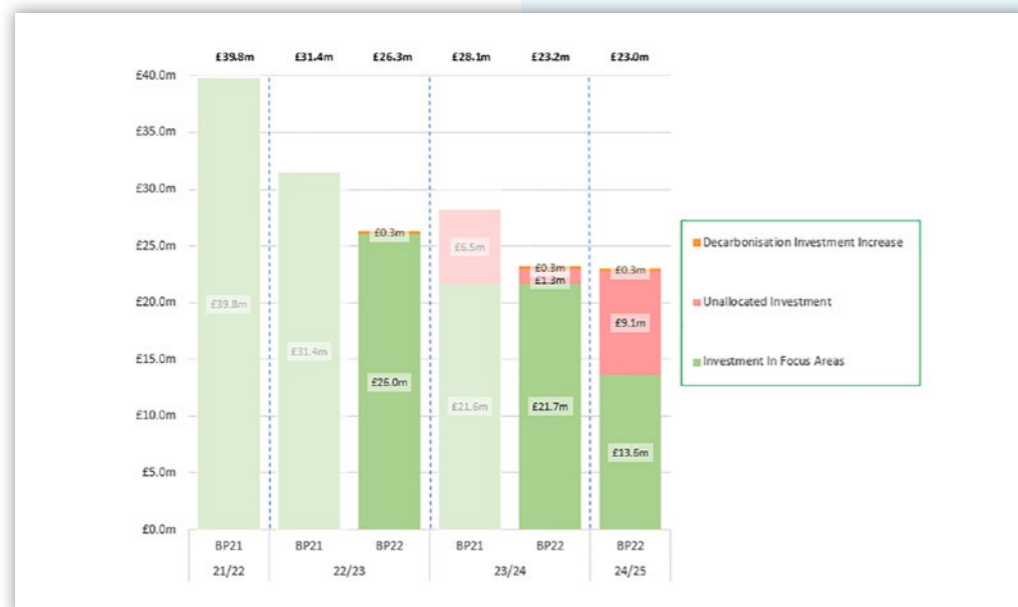


Figure 07 - total investment profile against that in BP21

By way of reminder, we have categorised our investment proposals within five core focus areas that represent the priorities for the upcoming business plan period:

- Exceptional Customer Experience
- Opening-Up Our Data
- Gemini Roadmap
- UK Link Roadmap
- Protecting Against Cyber Crime

In addition, there are three focus areas which capture work driven by BEIS/Ofgem, the Retail Energy Code (REC) and the Uniform Network Code (UNC):

- Decarbonisation
- REC Change
- General Change

As requested, we have summarised here the total cost for each investment focus area in BP22. In the following sections, we have included a table which compares BP21 to BP22 in more detail (Figures 9-16) for each individual focus area.

Investment Focus Area (£000s)	2022/23	2023/24	2024/25	Total Plan
Exceptional Customer Experience	315	290	-	605
Opening Up Our Data	859	349	349	1,557
Gemini Roadmap	6,640	9,370	7,820	23,830
UK Link Roadmap	1,855	6,361	610	8,826
Protecting Against Cyber Crime	2,985	424	-	3,409
Decarbonisation	1,800	1,800	1,800	5,400
REC Change	8,750	250	250	9,250
General Change	3,110	4,381	12,209	19,700
<b>Total Investment</b>	<b>26,314</b>	<b>23,225</b>	<b>23,038</b>	<b>72,577</b>

Figure 08 - total costs of each investment focus area in BP22

Please note that this table was updated on 04/11/2021 to amend an error in Protecting Against Cyber Crime for 2022/23. The figure initially published was £3,895, which has now been corrected to £2,985.



# Investment Area Focus

## 1. Exceptional Customer Experience

Customer Centricity is at the heart of our strategy. Our vision is to 'Deliver an exceptional customer experience at every opportunity that is designed around customer needs and provides value to their business'. To achieve this, Xoserve relentlessly seeks to make every customer contact an exceptional experience through our multi-channel services.

In BP20 we launched our Customer Experience (CX) Transformation Programme as a way to centrally manage and control all in-flight customer service improvement initiatives and Xoserve will continue to develop and build on this throughout the BP22 period.

The private investment possible through Correla has enabled Xoserve to remove the costs of a number of the investment areas within Exceptional Customer Experience (Customer Relationship Management, Customer Journey Continuous Improvements, Process Automation and Customer Service Centre). From 2022/23 onwards, these building blocks of customer experience will be funded by Correla, instead of customers, reflecting Correla's ongoing commitment to the market. These will continue to be delivered as before. Consequently, the only investment funding for Exceptional Customer Experience remaining in BP22 is for the continuation of the transformation of our website.

Our website is becoming increasingly popular with customers and usage has grown 75% between 2020 and 2021. It is however still underutilised, and investment is required to take the digital experience to an industry leading one. Digital maturity will move this channel from an 'emergent' platform to one which is user driven and allows actionable insights via analytics to continually move with changes in customer demand proactively. Solid foundations are being laid with current investment funding which will provide a platform to truly grow the digital channel, however further funding is required to serve customer needs quicker and easier than ever before.

The current challenge with Xoserve.com is that it is content based and serves customers with documents and static information which is often difficult to find. We want to provide a digital hub that links all of our services in one place and routes customers quickly to the answers they need, appropriate to their market segment.

We will demonstrate the value of this transformation through a significant improvement in Right First Time (RFT), On-time Delivery (OTD) and Customer Effort (CE) measured primarily but not exclusively by the annual Customer Satisfaction Survey, provided by the Institute of Customer Service (ICS). As such, our progress will be measurable and visible to our customers, who will be able to hold us accountable for delivering the improvements we promise.

Digital transformation deliverables and benefits include:

- Provision of a self-service capability that will prevent the need for customers to contact us, reducing query volumes by 20% year on year, and therefore increasing Right First Time as we connect customers to the information they need at the very first opportunity.
- Enabling customers to get to the outcome they need faster than before, improving our On-time Delivery and exceeding the utilities sector average score of 7.5 in our 2023 ICS survey.
- Making interaction with us easy, which we believe will lead to maintaining or improving on our already much-improved ICS customer effort score of 4.1 and increasing the Ease of Using Website score to 8 out of 10.
- Reduction in time spent by customers using Xoserve's website. Our analytics of website usage, query routes and task completion suggests an average time spent on tasks or navigating the Xoserve website of 6 minutes. Through investment sought in BP22 we believe we can reduce the average time to 2 minutes, resulting in an estimated saving across all our customer of circa £580k per year, to pass onto consumers. This is based on the following:
  - 4 minutes of saved time per visit
  - Forecast volumes of 228,500 website visits per year
  - This equates to 914,000 minutes or 2,030 days of saved time across all customers
  - Average UK energy sector salary of £68,000 (as at 2019)

The benefits listed above will all contribute to an exceptional customer experience, which we believe will be reflected in increases to our Customer Service Index (UKCSI) all sector average benchmark score and our Net Promoter Score (NPS) in the March 2023 ICS survey.

To achieve this digital transformation, we will invest a further £315k in 2022/23 and £290k in 2023/24. Overall investment for 2022/23 will reduce by £250k (£350k over two years) from the total approved in BP21 as the result of Correla's investment in Customer Relationship Management (CRM), Continuous Improvement and Improvement in Customer Communications.

In BP20 we set out an intention to re-platform the Contact Management Service (CMS), which was due to commence in 2021. During the BP21 process, customers indicated a clear desire to see CMS rebuilt in full, with processes having moved on significantly since its inception and customers suffering from a poor user experience. It was agreed that as funding was unknown for a rebuild plan, the previous re-platform value (of £0.6m) would be carried forward into BP21 with the provision that any draw down on those funds would need prior approval from the Contract Management Committee (CoMC).

We have been working closely with customers to understand key requirements and how processes need to change to reduce customer effort and provide a speedier resolution. There are two possible funding options, either through DSC funding or Correla investment.

After the first draft of BP22 was published, Customers requested more information on CMS. We shared a business case containing further detail and options in early November which was presented at DSC Contract Management Committee (CoMC) on 17th November. This gave rise to additional questions, so we will provide more information at the 15th December CoMC to enable further discussion. At this meeting customers will be able to choose their favoured option. While we do not yet know which option will be chosen, we have assumed that customers will favour the "subscription model" option as it represents optimum value. On that basis, the CMS costs in this final draft are based on the costs and funding profile of the subscription model. Consequently, these costs are shown as additions to MTB from 2023/24. If the investment funded option is chosen by customers instead, a revised Final Draft of BP22 will be issued to reflect this.

BP21 Approved (£'000)	21/22	22/23	23/24	Investment Funding Split %			
CRM	100	100	100	NTS	GDN	IGT	Shipper
Digital	370	315	290	7.2%	46.4%	1.5%	44.9%
CMS	600	-	-	-	-	-	-
Customer Journey Continuous Improvement	50	50	-	-	-	-	-
Improvement in Customer Communications	150	100	-	-	-	-	-
Customer Service Centre	200	-	-	-	-	-	-
<b>Investment Total</b>	<b>1,470</b>	<b>565</b>	<b>390</b>				
<b>Reclassification to MTB</b>	<b>-</b>	<b>-</b>	<b>-</b>				
<b>Total Expenditure</b>	<b>1,470</b>	<b>565</b>	<b>390</b>				

BP22 Proposed (£'000)	21/22	22/23	23/24	24/25
CRM	100	-	-	-
Digital	370	315	290	-
CMS	600	-	-	-
Customer Journey Continuous Improvement	50	-	-	-
Improvement in Customer Communications	150	-	-	-
Customer Service Centre	200	-	-	-
<b>Investment Total</b>	<b>1,470</b>	<b>315</b>	<b>290</b>	<b>-</b>
<b>Reclassification to MTB</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total Expenditure</b>	<b>1,470</b>	<b>315</b>	<b>290</b>	<b>-</b>

Variance BP21 vs BP22 (▲ = Increase) (£'000)	21/22	22/23	23/24	24/25
CRM	-	-100	-100	N/A
Digital	-	-	-	N/A
CMS	-	-	-	N/A
Customer Journey Continuous Improvement	-	-50	-	N/A
Improvement in Customer Communications	-	-100	-	N/A
Customer Service Centre	-	-	-	N/A
<b>Investment Total</b>	<b>-</b>	<b>-250</b>	<b>-100</b>	<b>N/A</b>
<b>Reclassification to MTB</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>N/A</b>
<b>Total Expenditure</b>	<b>-</b>	<b>-250</b>	<b>-100</b>	<b>N/A</b>

Figure 09



# Investment Area Focus



## 2. Opening Up Our Data

As our customers' need for data grows, so does the expectation for Xoserve to provision data in a secure, governed and timely fashion. Opening-Up Our Data is part of a multi-year investment that focuses on improvements in how we manage and provision data to DSC customers. For BP22, investment will be a continuation of two investment initiatives:

- **Governed Data:** The continuation of our journey along the Data Governance maturity path, which includes the development of a Data Glossary, underpinning a step change in data quality.
- **Open and Timely Data:** The continuation of improvements in how we provision data to customers through DDP, allowing customers to self-serve and access increased amounts of actionable insight.

These initiatives continue to focus on tackling key challenges faced by customers around the timeliness, quality, access and the associated costs to provision new data. Investment will remain focused on tackling customers' pain points, with key benefits highlighted below:

- **Improved access:** Ability to navigate data through drillable dashboards and integrate directly with our systems using Application Programming Interfaces (APIs).
- **Reduced cost:** Self-serve data reducing the need to raise and manage change requests.
- **Improved quality:** Improved transparency of data flows and sourcing data from one location, driving consistency and quality in outputs.
- **Improved decision making:** Access to the latest data held by Xoserve, improving customers' ability to take corrective action based on the actionable insight DDP provides.

We estimate this investment will deliver a financial benefit of £400k-£600k per year spread across all market participants, directly benefitting consumers when passed onto them through reduced bills. This is based on the following assumptions:

- Reduced effort of 420 hours p.a. in raising data queries to clarify file flow information for UK Link, Gemini and data inputs/outputs (30 customer queries, effort reduced from an average of 15 hours per request to an average of 1 hour per request)
- Reduced effort to assess minor/major changes of 15,000 hours p.a. (10 changes each for 100 customer, each change reduced from 3 days' to 1 day's effort)
- Reduction in effort to manage file format rejections of 7,500 hours p.a. (number of instances of rejection reduced from 5 to 3 per customer, at 5 days each)
- Average employee cost of £44,250 (reflecting the type of resource typically engaged in these activities)

### Governed Data

With ever increasing demands for data it is vital that Xoserve has a robust Data Governance Framework in place to ensure that we meet customer expectations of a Central Data Service Provider (CDSP). We must ensure that our data processing is understandable and produces quality outputs that customers trust and can be relied upon in their day to day activities.

In BP21, we began to lay the foundation of a more sophisticated Data Governance Framework that enables innovation. This investment helped foster a deep understanding of organisational and external data usage which enables us to support industry wide initiatives to develop a data common language across the sector that in turn drives value from the data. Against an increase in regulatory obligations, specifically for the newly formed Retail Energy Code Company (RECCo), the initiative was a launchpad to help drive best practice in line with Ofgem's Data Best Practice guidelines.

In BP22 we will be maturing the Data Glossary that was started within BP21. We now have a platform that has ingested the industry file formats and associated system linkages together with a subset of reports fully described. Throughout the BP22 period we will build on this foundation and incorporate more systems and more data outputs to give customers a more comprehensive view of all data outputs. The Data Glossary will be a software solution that captures all aspects of how we use, transform and provision the data we hold as the CDSP.



### Open and Timely Data

Through the introduction of the core Data Discovery Platform capability (DDP Core), we have been able provide a service that helps tackle customer pain points and with continued investment we can ensure that customers have further flexibility in accessing the data they need to help drive key business decisions, whether that be through DDP Visualisations, APIs, Reports or Data Extracts.

We will use investment funding to support DDP Core services, improving data access and generating actionable insight that helps customers meet industry obligations. Investment will support the ongoing infrastructure, software and support costs required to maintain DDP services alongside six regular releases per year that continue to enhance the availability of data in line with customer needs and priorities. There is currently a healthy pipeline of requirements that will deliver a range of benefits for customers that support performance improvements through the provision of actionable insight.

In line with previous years' initiatives, investment will aim to align with key recommendations of the Energy Data Taskforce (Data Visibility, Infrastructure and Asset Visibility, Operational Optimisation, Open Markets, Agile Regulation) who have been commissioned by the Department for Business, Energy and Industrial Strategy (BEIS), Ofgem and Innovate UK to modernise data across the energy industry.

Finally, following feedback received from customers during the consultation period we have:

- Reclassified £172k of Demand Estimation costs into MTB from 2022/23. This service supports the Demand Estimation Sub-Committee (DESC) in meeting obligations to produce gas consumption profiles and estimates of peak usage demand.
- Continued to classify the ongoing costs associated with DDP Core releases (£349k) as an investment.
- Amended the funding split to exclude NTS.

BP21 Approved (£'000)	21/22	22/23	23/24
Timely & Open Data	1,180	821	521
Governance of Data	630	210	-
<b>Investment Total</b>	<b>1,810</b>	<b>1,031</b>	<b>521</b>
<b>Reclassification to MTB</b>	-	-	-
<b>Total Expenditure</b>	<b>1,810</b>	<b>1,031</b>	<b>521</b>

BP22 Proposed (£'000)	21/22	22/23	23/24	24/25
Timely & Open Data	1,180	649	349	349
Governance of Data	630	210	-	-
<b>Investment Total</b>	<b>1,810</b>	<b>859</b>	<b>349</b>	<b>349</b>
<b>Reclassification to MTB</b>	-	<b>172</b>	<b>172</b>	<b>172</b>
<b>Total Expenditure</b>	<b>1,810</b>	<b>1,031</b>	<b>521</b>	<b>521</b>

Variance BP21 vs BP22 (▲ = increase) (£'000)	21/22	22/23	23/24	24/25
Timely & Open Data	-	-172	-172	N/A
Governance of Data	-	-	-	N/A
<b>Investment Total</b>	-	<b>-172</b>	<b>-172</b>	N/A
<b>Reclassification to MTB</b>	-	<b>+172</b>	<b>+172</b>	N/A
<b>Total Expenditure</b>	-	-	-	N/A

Investment Funding Split %			
NTS	GDN	IGT	Shipper
0.0%	41.7%	8.3%	50.0%
7.2%	46.4%	1.5%	44.9%

Figure 10



# Investment Area Focus

## 3. Gemini Roadmap

Our Gemini Roadmap ensures we stay up to date with new obligations and changes within the Capacity and Balancing regimes. Our plan for annual releases will, as always, be built in partnership with National Grid to ensure that these obligations are met by the Gemini system.

We continue to review the applicability of the year-on-year phasing of the Gemini Roadmap to ensure that it meets the evolving demands from National Grid and the Industry. We are continuing with our plans to enhance the user experience following on from the early roadmap foundation stages. This is in line with National Grid's review of their ongoing needs for Balancing and Capacity Service Provision and the potential longer-term replacement of the current Gemini system.

The Gemini investment programme has been based on the scenario where the Gemini system remains a CDSF provision for the foreseeable future. Whilst this represents one outcome from the current process being run by National Grid, in all scenarios the current Gemini system will remain for at least 2022/23 and potentially for the following year. Since the tender process is not scheduled to complete until after BP22 is finalised, we will consider any changes to costs for future years in BP23, following consultation with National Grid.

With this in mind, we have been working closely with National Grid to ensure that the latest roadmap ensures that the provision of Gemini is maintained in a supported state and that enhancements continue to deliver beneficial relief of the identified industry pain points.

This is being achieved by retaining the core engine of the Gemini application, while delivering:

- Performance and reliability enhancements
- Simplification and modernisation of the user interface
- Improvements that make the platform easier and more cost efficient to change

The roadmap will deliver the necessary sustaining activities for the estate throughout the business planning period, user experience enhancements and the delivery of functional enhancements to support the evolving Uniform Network Code (UNC) obligations of the market. BP22 will concentrate on data archival, the ongoing sustaining of the platform and continuation of our test automation rollout (investment of £3.8m in 2022/23, £14.92m over three years). This will continue to drive improvements to reduce the overall time and therefore cost of future development.

In this final draft, the investment in Gemini Sustain has been amended at the request of National Grid. The revised values are shown in figure 11.

BP21 Approved (£'000)	21/22	22/23	23/24
Gemini Enhancements	2,980	2,980	2,980
Future of Gemini	1,957	7,812	3,742
<b>Investment Total</b>	<b>4,937</b>	<b>10,792</b>	<b>6,722</b>
Reclassification to MTB	-	-	-
<b>Total Expenditure</b>	<b>4,937</b>	<b>10,792</b>	<b>6,722</b>

BP22 Proposed (£'000)	21/22	22/23	23/24	24/25
Gemini Regulatory Change*	2,980	2,970	2,970	2,970
Gemini Sustain *	1,957	3,670	6,400	4,850
<b>Investment Total</b>	<b>4,937</b>	<b>6,640</b>	<b>9,370</b>	<b>7,820</b>
Reclassification to MTB	-	-	-	-
<b>Total Expenditure</b>	<b>4,937</b>	<b>6,640</b>	<b>9,370</b>	<b>7,820</b>

\*Gemini Enhancements renamed to Gemini Regulatory Change and Future of Gemini renamed as Gemini Sustain in BP22

Variance BP21 vs BP22 (= increase) (£'000)	21/22	22/23	23/24	24/25
Gemini Regulatory Change	-	-10	-10	N/A
Gemini Sustain	-	-4,142	+2,658	N/A
<b>Investment Total</b>	-	<b>-4,152</b>	<b>+2,648</b>	N/A
Reclassification to MTB	-	-	-	N/A
<b>Total Expenditure</b>	-	<b>-4,152</b>	<b>+2,648</b>	N/A

Investment Funding Split %			
NTS	GDN	IGT	Shipper
100%	0%	0%	0%
100%	0%	0%	0%

Figure 11





# Investment Area Focus

## 4. UK Link Roadmap

The UK Link Roadmap is a multi-year programme of work which establishes a controlled approach to delivering service both now and in the future and is focussed on three areas:

- Improving the reliability of service to customers
- Ensuring UK Link can support customer needs and the future transformation of the energy sector
- Reducing UK Link technical debt cost effectively, based on technology that optimises performance

The primary objective of the UK Link Roadmap has been to ensure this critical data processing platform is optimised and sustained to provide continued service for the UK Gas Sector. As well as being critical for consumer switching, UK Link has proven pivotal to the successful migration of Supplier and Shipper portfolios during the current gas market crisis, and the Roadmap secures its future performance for the benefit of the industry and consumers alike.

This Roadmap will be achieved in coming years through reducing and replacing the complex landscape of expensive and inflexible older technologies within Integration, Batch and Reporting by making it more real-time.

The UK Link Roadmap is also anticipated to achieve a reduction in operational costs (MTB) from 2023/24. This will benefit consumers when this saving is passed on to them.

As described in BP21, the first step in achieving this is through a movement to cloud hosting and this activity is currently in flight with a target implementation date in early 2022. The Move to Cloud programme is delivering key initiatives to sustain and optimise the platform by ensuring that the existing technology components are updated and maintained, increasing performance, stability, and service provision.

We are continuing this journey in BP22 by sustaining and optimising our technology landscape further.

The UK Link Roadmap is made up of four investments:

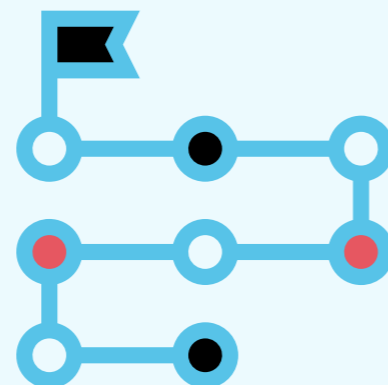
### UK Link Future Enhancements

Through this investment, we will simplify the underlying technology components in UK Link, which will in turn reduce the cost of software licences and change delivery, improve flexibility, agility and platform performance. Our approach will also establish a foundation to enable Xoserve to support the sector's transition to more real-time data exchanges and real-time data processing (the visualisation and access to this data is delivered via our investments in Opening-Up our Data). Given the scale of our investment in Core Platform Migration and the proximity of the Central Switching Programme go live, this work will not commence until financial year 2023/24. Our forecast cost for this investment remains at £5.7m, as in BP21.

### UK Link Service Essentials

This investment will continue to deliver improvements in the automation of our core service management processes and improvements in our application monitoring. We will invest £255k in 2022/23, unchanged from BP21. However, we have identified that our physical Information Exchange (IX) network requires maintenance and upgrade over 2023/24 and 2024/25 which has added an additional £360k each year to the numbers in BP22. The benefit of this investment is to ensure we deliver seamless connectivity to customers and remain able to handle increasing volumes of files/data and the industry's demands for a performant integration layer.

Both the Central Switching Service Consequential (CSSC) programme and the movement of UK Link to cloud hosting have required, and will continue to require, significant investment in both functional and non-functional testing. We have sought to derive future value from this investment through the creation of an automated test framework which facilitates the testing of both functional, performance and regression test cycles for all future change initiatives; this will deliver substantial benefits to customers in assuring the quality of future change delivery whilst reducing the cost and time taken to perform test cycles.



### Capacity for Change

Our three-year investment which commenced in 2021/22 will deliver:

- A 25% reduction in project delivery timescales and project costs associated with UK Link major releases.
- A 25% reduction in post implementation defects associated with UK Link major releases.
- Ensure 75% of Xoserve core business process testing scenarios are fully automated, delivering a 25% reduction in customer testing effort per major release (where applicable).

### Core Platform Migration

Following the move to the cloud planned in early 2022 this investment recognises the need to tackle a broader set of requirements than just replacement of on-premise hardware with cloud alternatives. We must also replace end of life and out of support components with optimised and proven cloud-native alternatives that deliver year-on-year cost savings. This will further enhance the cloud capabilities of the UK Link platform and achieves the key drivers for performance improvement, increased security and increased capacity and offers the greatest opportunity to reduce overall cost to serve, for which we have included the first annualised £0.7m benefit in MTB in 2023/24.

BP21 Approved (£'000)	21/22	22/23	23/24	
UK Link Future Enhancements	-	-	5,712	
UK Link Service Essentials	555	255	-	
Capacity for Change	2,517	50	61	
Core Platform Migration	5,244	1,550	228	
<b>Investment Total</b>	<b>8,316</b>	<b>1,855</b>	<b>6,001</b>	
<b>Reclassification to MTB</b>	-	-	-	
<b>MTB Savings</b>	-	-	-	<b>700</b>
<b>Total Expenditure</b>	<b>8,316</b>	<b>1,855</b>	<b>5,301</b>	

BP22 Proposed (£'000)	21/22	22/23	23/24	24/25
UK Link Future Enhancements	-	-	5,712	250
UK Link Service Essentials	555	255	360	360
Capacity for Change	2,517	50	61	-
Core Platform Migration	5,244	1,550	228	-
<b>Investment Total</b>	<b>8,316</b>	<b>1,855</b>	<b>6,361</b>	<b>610</b>
<b>Reclassification to MTB</b>	-	-	-	-
<b>MTB Savings</b>	-	-	-	<b>700</b>
<b>Total Expenditure</b>	<b>8,316</b>	<b>1,855</b>	<b>5,661</b>	<b>90</b>

Variance BP21 vs BP22 (* = increase) (£'000)	21/22	22/23	23/24	24/25
UK Link Future Enhancements	-	-	-	N/A
UK Link Service Essentials	-	-	+360	N/A
Capacity for Change	-	-	-	N/A
Core Platform Migration	-	-	-	N/A
<b>Investment Total</b>	-	-	<b>+360</b>	N/A
<b>Reclassification to MTB</b>	-	-	-	N/A
<b>MTB Savings</b>	-	-	-	N/A
<b>Total Expenditure</b>	-	-	<b>+360</b>	N/A

Investment Funding Split %				
NTS	GDN	IGT	Shipper	
7.2%	46.4%	1.5%	44.9%	
7.2%	46.4%	1.5%	44.9%	
0.0%	34.5%	0.0%	65.5%	
0.0%	90.0%	0.0%	10.0%	

Figure 12



# Investment Area Focus

## 5. Protecting Against Cyber Crime

There are two areas of investment in relation to the delivery of the Information Security and Privacy Strategy:

### Information Cyber Security Strategy

Xoserve is a pivotal hub for the UK gas industry's customers, where one serious cyber-attack can potentially impact the entire gas industry's data services and market, making Xoserve and its key service providers cyber-attack targets. By further developing our approach to Opening-Up Our Data to provide more centralised analysis across industry-wide data and the benefits this provides, we become an increasingly attractive target for malicious attacks. Therefore, protecting customer, consumer and industry assets is a key component of our strategy. A peer organisation was successfully attacked in 2020, and whilst the attack did not reach the core customer platform, it highlighted the need to operate as the strongest link in the chain.

A mature and effective information cyber security capability increases business cyber resilience and reduces the risk likelihood and impact of a cyber-attack or data breach. Cyber threats continuously evolve and are becoming increasingly sophisticated at an extremely rapid rate, in some cases, more rapidly than the technology, data and people landscape of an organisation and those it is linked to. Therefore, continued focus in this area is required to ensure information cyber security controls are effective, current, and future proof in preventing, detecting and responding to major Cyber Security attacks and data breaches.

This investment is building a capability which allows Xoserve to proactively identify Cyber Threats and Attacks and implement effective resilience controls. In the unlikely event of an attack, it will also ensure that response controls and Security Incident management are real-time, mature and able to reduce the likelihood of success of such an attack or effectively contain the impact if an attack is successful.

### Data Privacy Law Compliance (UK GDPR)

Within BP21, an Information Security and Privacy Strategy and a four-year transformation programme was developed and initiated, which will continue to be delivered across the periods covered by BP21 and BP22. This incrementally increases our cyber security resilience capabilities and maturity while decreasing the operational information security and privacy risk and reducing any potential financial and reputational impact year-on-year, in-line with industry frameworks and DSC commitments. The strategy matures data privacy operations and controls, supporting our customers to fulfil their obligations as Data Controllers and our obligation as a Data Processor and Sub-Processor, whilst demonstrating compliance with Data Privacy Law (UK General Data Protection Regulation - GDPR).

The strategy and approach have been independently assessed and externally ratified by NCC Group and the British Standards Institution (BSI), for appropriateness, proportionality, and best practice.



The benefits of the Information Security and Privacy programme include:

- Reduced impact and likelihood of a cyber-attack
- Reduced likelihood of a customer data breach
- The ability to share enhanced threat intelligence with customers and the industry
- Lower Cost to Serve (C2S) through selection of a hybrid operating model
- Improved On-Time Delivery (OTD) of individual rights requests (supporting a 72 hour turnaround where applicable) for customers
- Full compliance with UK GDPR privacy regulations

A government Cyber Security Breach Survey has determined the overall average cost of a single Cyber Security breach for a medium/large business is between £3m to £5m, taking into consideration, damages and remedial activities among other things, which would need to be funded by the gas industry. There are also implications around brand damage for our customers and further loss of confidence and trust in the gas market to consider.

The newly delivered initiatives within the four-year investment will be transitioned into MTB from 2023/24 along with the associated Information Cyber Security and Privacy service run costs (£2.0m) to ensure realised benefits are maintained including mature Cyber Resilience, NIST, ISO27001 and UK GDPR compliance in-line with industry and legal standards and obligations.

BP21 Approved (£'000)	21/22	22/23	23/24	
Information Cyber Security Strategy	3,260	2,460	2,260	
Data Privacy Law Compliance	1,050	525	160	
<b>Investment Total</b>	<b>4,310</b>	<b>2,985</b>	<b>2,420</b>	
<b>Reclassification to MTB</b>	-	-	-	
<b>Total Expenditure</b>	<b>4,310</b>	<b>2,985</b>	<b>2,420</b>	

BP22 Proposed (£'000)	21/22	22/23	23/24	24/25
Information Cyber Security Strategy	3,260	2,460	424	-
Data Privacy Law Compliance	1,050	525	-	-
<b>Investment Total</b>	<b>4,310</b>	<b>2,985</b>	<b>424</b>	<b>-</b>
<b>Reclassification to MTB</b>	-	-	<b>1,996</b>	<b>2,097</b>
<b>Total Expenditure</b>	<b>4,310</b>	<b>2,985</b>	<b>2,420</b>	<b>2,097</b>

Variance BP21 vs BP22 (• = increase) (£'000)	21/22	22/23	23/24	24/25
Information Cyber Security Strategy	-	-	-1,836	N/A
Data Privacy Law Compliance	-	-	-160	N/A
<b>Investment Total</b>	-	-	<b>-1,996</b>	<b>N/A</b>
<b>Reclassification to MTB</b>	-	-	<b>+1,996</b>	<b>N/A</b>
<b>Total Expenditure</b>	-	-	-	<b>N/A</b>

Investment Funding Split %				
NTS	GDN	IGT	Shipper	
7.2%	46.4%	1.5%	44.9%	
7.2%	46.4%	1.5%	44.9%	

Figure 13



# Investment Area Focus

## 6. Decarbonisation

Decarbonisation is an increasing priority across the energy sector, as highlighted by the BEIS Energy White paper released in December 2020. The Government's 10-point plan includes driving the growth of low-carbon hydrogen. Understanding how Xoserve can enable industry processes and systems to support hydrogen/biomethane development in the most cost effective and future proof way is crucial to supporting the Government's plan, particularly relating to the decarbonisation of heat.

Xoserve will continue to drive support for decarbonisation trials and pilots, whilst actively engaging with the industry to build decarbonisation journeys for customers and end consumers, whilst providing relevant data to support industry decisions. We see this work as essential to the future development of the gas industry and our activities in this space will be funded by the Decarbonisation investment line as already planned in BP21.

Following feedback from customers during the BP22 Principles and Approach consultation period, we have separated this out from General Change into its own Investment Focus Area, to ensure it receives the attention it deserves. Recognising the importance of this activity, we have also recently moved the leadership of these initiatives, previously outsourced to our main service provider, back in house.

In 2022/23 we see the number of pilots increasing and we are proposing to develop the existing resource reviewing Decarbonisation requirements into a dedicated Decarbonisation Programme team focusing on three areas:

- Industry Engagement – working with all industry customer and stakeholder groups, ensuring a full level of understanding across the Governance, Process, Data requirements and System changes required to meet gas industry Net Zero objectives by 2050.
- Design, develop and build minimum impact process and system changes to support Pilot projects supporting Hydrogen Biomethane and other Net Zero development projects.
- Design in detail a programme of work that will enable delivery of a multi-stage transition to facilitate accurate settlement and invoicing, starting with the end in mind of 100% Net Zero energy systems to ensure that the industry is ready to go when UK Decarbonisation policy decisions are made.

A key part of the development work we are doing in this area currently is to address the material impact of managing differing calorific values across the network.

The calorific value (CV) of 100% hydrogen is about a third of the CV of natural gas. This means that more hydrogen needs to flow through the meter to burn the same amount of energy as natural gas. If the flow weighted average CV (FWACV) for the relevant local distribution zone (LDZ) were to be used for hydrogen locations, it would appear that the hydrogen sites were utilising approximately 3 times the amount of energy they actually were using.

We are supporting hydrogen trials by implementing minimal viable changes to deliver a solution where end consumer billing processes are not negatively affected by hydrogen use and that end consumers trialling hydrogen experience minimal difference to their current supply and billing processes, while paying the right amount for their energy consumption. In doing so, we are keeping the cost of industry change development as low as possible, avoiding unnecessary cost to the end consumer bill.

In BP21 we forecast investment spend of £1.5m for 2022/23. In the first draft, this was increased to £3m. Based on feedback from the Gas Distribution Networks (GDNs), this has been reduced to £1.8m to reflect the current view of the project scope and technical design requirements.

BP21 Approved (£'000)	21/22	22/23	23/24	
Decarbonisation	1,500	1,500	1,500	
<b>Investment Total</b>	<b>1,500</b>	<b>1,500</b>	<b>1,500</b>	
Reclassification to MTB	-	-	-	
<b>Total Expenditure</b>	<b>1,500</b>	<b>1,500</b>	<b>1,500</b>	

BP22 Proposed (£'000)	21/22	22/23	23/24	24/25
Decarbonisation	1,500	1,800	1,800	1,800
<b>Investment Total</b>	<b>1,500</b>	<b>1,800</b>	<b>1,800</b>	<b>1,800</b>
Reclassification to MTB	-	-	-	-
<b>Total Expenditure</b>	<b>1,500</b>	<b>1,800</b>	<b>1,800</b>	<b>1,800</b>

Variance BP21 vs BP22 (* = increase) (£'000)	21/22	22/23	23/24	24/25
Decarbonisation	-	+300	+300	N/A
<b>Investment Total</b>	-	<b>+300</b>	<b>+300</b>	N/A
Reclassification to MTB	-	-	-	N/A
<b>Total Expenditure</b>	-	<b>+300</b>	<b>+300</b>	N/A

Investment Funding Split %			
NTS	GDN	IGT	Shipper
0%	100%	0%	0%

Figure 14





# Investment Area Focus

## 7. REC Change

The introduction of the Retail Energy Code (REC) brings together the code requirements relating to retail energy activities under one umbrella and is intended to provide a consistent set of arrangements for gas/electricity suppliers as well as consumers. Among other things, it will govern the operation of faster and more reliable arrangements for consumers to switch their energy supply, which will be delivered via the Central Switching Service (CSS).

The introduction of the REC to replace SPAA and MRA also introduces a set of new governance and change delivery processes for Xoserve, including the introduction of the new Gas Enquiry Services (GES) to RECCo (rather than through the Data Enquiry Service (DES) in UNC) and the requirement to connect REC Systems & UK Link under Gas Retail Data Agent (GRDA). While the REC and associated administration are still in the process of being defined, it is expected that additional resources will be required, at least in the initial years of operation, to support both change management and the new, additional contractual relationships between Xoserve and RECCo that will be required.

Additionally, RECCo is actively considering the inclusion of a third major release for UK Link each year, the impact of which is currently being assessed. For the purposes of this plan we have assumed that this will not require an increased DSC Change Budget.

In this draft the funding split for REC Change budget has been amended to exclude NTS as a funding party.

Ofgem are yet to confirm the Go-live date for CSS, however it is anticipated to occur between June and August 2022. We are currently assuming the latest date for Go-Live (August 2022) and a three-month Post Implementation Support (PIS) window (September 2022 to November 2022) thereafter, transitioning to an MTB footing from April 2023.

Our investment cost forecast for BP22 remains the same as last year's submission (£8.5m) however, areas of significant risk remain within the CSS programme, which could result in an increase in project expenditure up to conclusion of the PIS period, including:

- Central programme definition of scope and accountabilities/SLAs during Post Implementation phase is not yet defined to sufficient level of detail to allow for accurate estimation/planning
- PIS and MTB volumetrics have not been defined by the central industry programme and are therefore based on our experience of change delivery. Actual volumes may be different, depending on the approach taken by other organisations involved in the switching programme.
- PIS period could be extended, with associated costs, should the central programme not achieve stability within the 3 months period planned within the Central Programme currently.

As in the first draft, contingency for any further delay within CSSC has not been included in this Business Plan. Consequently, in the event that there are any substantive delays to current programme timelines Xoserve may need to make a further funding request to customers within the life of the Business Plan.

We currently forecast MTB run costs as a direct result of the CSS programme at £3.9m per annum from 2023/24; this includes both system and resource costs and is an increase on the BP21 forecast (£3.4m) following the further elaboration of service requirements by RECCo (highlighted as risks in our BP21 Plan).

The Central Switching Programme will continue to evolve past its initial launch and will therefore likely generate a steady stream of change requirements following implementation. We are already aware of a number of significant post-implementation changes which have been deferred by the CSS programme for implementation post CSS Go-live. We have included £250k a year for the support of customer change processes and this plan assumes that any consequential solution delivery funding would draw from the DSC Change Budget under General Change.

BP21 Approved (£'000)	21/22	22/23	23/24	
Central Switching Service	13,000	8,500	-	
REC Change Budget	-	-	-	
<b>Investment Total</b>	<b>13,000</b>	<b>8,500</b>	<b>-</b>	
<b>Reclassification to MTB</b>	<b>-</b>	<b>-</b>	<b>-</b>	
<b>MTB run costs</b>	<b>-</b>	<b>-</b>	<b>3,349</b>	
<b>Total Expenditure</b>	<b>13,000</b>	<b>8,500</b>	<b>3,349</b>	

BP22 Proposed (£'000)	21/22	22/23	23/24	24/25
Central Switching Service	13,000	8,500	-	-
REC Change Budget	-	250	250	250
<b>Investment Total</b>	<b>13,000</b>	<b>8,750</b>	<b>250</b>	<b>250</b>
<b>Reclassification to MTB</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>MTB run costs</b>	<b>-</b>	<b>-</b>	<b>3,888</b>	<b>3,888</b>
<b>Total Expenditure</b>	<b>13,000</b>	<b>8,750</b>	<b>4,138</b>	<b>4,138</b>

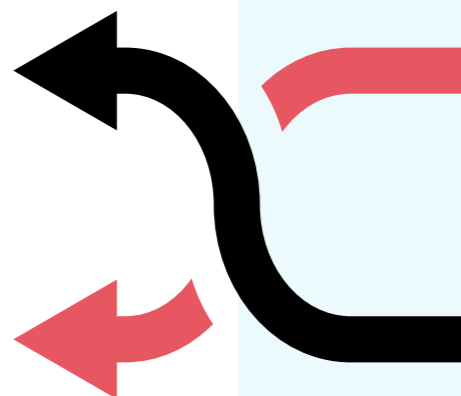
  

Variance BP21 vs BP22 (▲ = increase) (£'000)	21/22	22/23	23/24	24/25
Central Switching Service	-	-	-	N/A
REC Change Budget	-	+250	+250	
<b>Investment Total</b>	<b>-</b>	<b>+250</b>	<b>+250</b>	<b>N/A</b>
<b>Reclassification to MTB</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>N/A</b>
<b>MTB run costs</b>	<b>-</b>	<b>-</b>	<b>+539</b>	<b>N/A</b>
<b>Total Expenditure</b>	<b>-</b>	<b>+250</b>	<b>+789</b>	<b>N/A</b>

Investment Funding Split %				
NTS	GDN	IGT	Shipper	
0%	0%	0%	100%	
0%	36%	6%	59%	

Figure 15







# Investment Area Focus

## 8. General Change

The General Change Budget is an annual investment made by customers to deliver changes approved for design and implementation by the industry elected DSC Change Management Committee (ChMC).

In previous years, the DSC Change Budget has been dominated by UNC driven change. Following feedback from customers during the consultation period, we have renamed this Investment Area to General Change, to reflect that changes may come from a broader range of market drivers than just UNC. We have also separated out Decarbonisation, which was introduced in this Investment Area in BP21, into its own to ensure it receives the attention it needs.

Changes that are selected for implementation in any given financial year have been through extensive industry consultation, passing through the 'capture' process. Consultation includes the opportunity to engage with each individual change in meetings (at the ChMC Delivery Sub-Group), in writing (via engagement with the UK Link Change Pack process) and in discussion at the ChMC.

For changes that are driven by regulatory (e.g. UNC) amendments, consultation also includes the code modification process.

The benefits for each individual change, be that compliance with amended code rules, or the greater efficiency of UK Link and related industry processes, are discussed and assessed in ChMC.

On 11th August 2021, the ChMC endorsed an annual DSC Change budget based on its view of potential costs associated with:

- Major / standalone releases that may draw on the BP22 budget
- Development and delivery of changes that emanate from the Retail Energy Code (REC)
- Market Trials, changes associated with the Performance Assurance Committee (PAC)

The recommended BP22 DSC Change Budget is £3.25m p.a. (£9.75m across three years) of which £250k p.a. is shown in the REC Change focus area. In the second and third years of the plan, placeholders of £1.3m (reduced from £1.5m in the first draft) and £9.1m (unchanged from the first draft) respectively for Unallocated Investment has been included to reflect a flat profile of investment spend for all constituencies across the plan period.

We have seen a continued requirement for Non-Standard Data Items for Reporting usage and so we have added this back in to BP22. Whilst this has been included for the full plan period, we will monitor if this is required going forward.

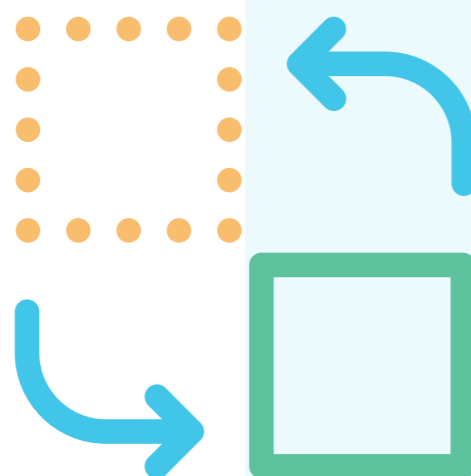
BP21 Approved (£'000)	21/22	22/23	23/24
DSC Change Budget	3,590	3,590	3,590
Unallocated Investment Pot	-	-	6,400
Non Standard Items for Data Reporting	110	-	-
<b>Investment Total</b>	<b>3,700</b>	<b>3,590</b>	<b>9,990</b>
<b>Reclassification to MTB</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total Expenditure</b>	<b>3,700</b>	<b>3,590</b>	<b>9,990</b>

BP22 Proposed (£'000)	21/22	22/23	23/24	24/25
DSC Change Budget	3,590	3,000	3,000	3,000
Unallocated Investment Pot	-	-	1,271	9,099
Non Standard Items for Data Reporting	110	110	110	110
<b>Investment Total</b>	<b>3,700</b>	<b>3,110</b>	<b>4,381</b>	<b>12,209</b>
<b>Reclassification to MTB</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total Expenditure</b>	<b>3,700</b>	<b>3,110</b>	<b>4,381</b>	<b>12,209</b>

Variance BP21 vs BP22 (+ = increase) (£'000)	21/22	22/23	23/24	24/25
DSC Change Budget	-	-590	-590	N/A
Unallocated Investment Pot	-	-	-5,129	-
Non Standard Items for Data Reporting	-	+110	+110	N/A
<b>Investment Total</b>	<b>-</b>	<b>-480</b>	<b>-5,609</b>	<b>N/A</b>
<b>Reclassification to MTB</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>N/A</b>
<b>Total Expenditure</b>	<b>-</b>	<b>-480</b>	<b>-5,609</b>	<b>N/A</b>

Investment Funding Split %			
NTS	GDN	IGT	Shipper
2.1%	34.8%	5.4%	57.7%
7.2%	46.4%	1.5%	44.9%
7.2%	46.4%	1.5%	44.9%

Figure 16



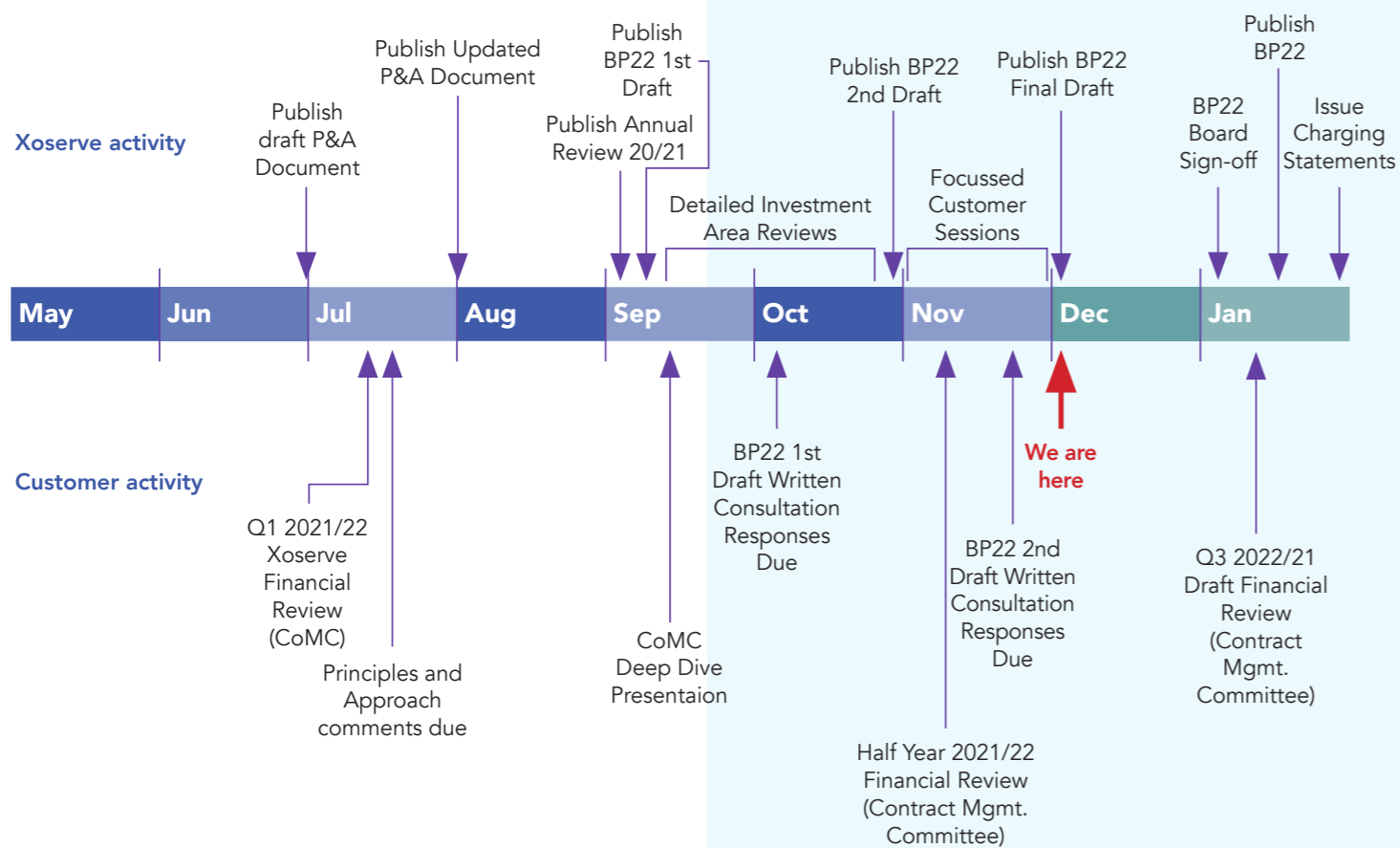


# Customer Engagement

We were keen to offer as many opportunities as possible for all our customers to provide us with their feedback on our business plan. To enable this, we repeated and continued to improve on our Consultation engagement approach used in BP21 for BP22 and made full use of the following engagement channels:

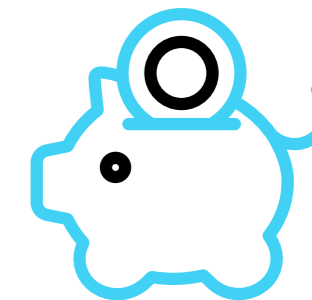
- Publishing all written consultation documents and inviting customers to respond in writing.
- Meetings with customer organisations to conduct in-depth reviews of the draft plan content and associated funding requirements, to help customers understand what the draft plan means for their organisations.
- Provision of updates to customers and receipt of feedback via DSC Contract Management Committee and Change Management Committee Meetings.
- Presentation of Investment Focus area overviews at the September Contract Management Committee.
- Provision of investment business cases to all DSC Contract Managers.
- Engagement through advocate-led sessions.
- Bespoke security deep dives engaging customer Chief Information Security Officer (CISO) / Head of security (or equivalent).

We have set out below a summary of the engagement phases and their timings.



## Timeline for consultation with customers

Step	Date	Action	Provider	Receiver	Deliverable
1	10th Sep	Consult 1: Issue draft Business Plan for consultation (one)	Xoserve	All Customers	Draft Business Plan
2	15th Sep	Consult 1: Overview presentations at the Contract Management Committee (CoMC) meeting	Xoserve	All Customers	Teams Presentation
3	15th Sep	Consult 1: Provide feedback at the Contract Management Committee (CoMC) meeting	CoMC	Xoserve	Feedback notes and actions
4	07th Oct	Consult 1: Overview presentations at the Change Management Committee (ChMC)	Xoserve	All Customers	Teams Presentation
5	15th Sep to 15th Oct	Individual and Constituency customer meetings	Xoserve	All Customers	Microsoft Teams Calls
6	15th Oct	Consult 1: Provide written feedback	All Customers	Xoserve	Written feedback
7	29th Oct	Consult 2: Issue updated draft Business Plan for consultation (two)	Xoserve	All Customers	Updated draft business plan
8	19th Nov	Consult 2: Provide written feedback	All Customers	Xoserve	Written feedback
9	03rd Dec	Consult 3: Issue updated final draft Business Plan for consultation (three)	Xoserve	All Customers	Updated draft business plan
10	10th Dec	Consultation period ends	All Customers	Xoserve	



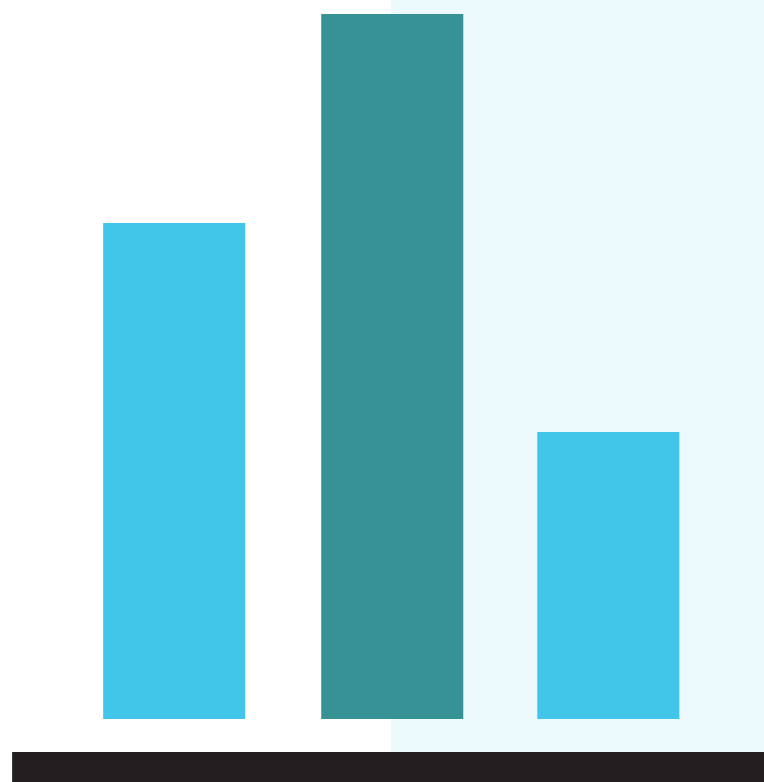
# Customer Constituency Funding

## Customer Constituency Funding

The schedules of Customer Constituency Funding continue to reflect the application of our updated Cost Allocation and Charging Methodology, which was used for the first time in BP21.

For each constituency we have provided a chart (Figures 17-20) which compares:

- A view of current year funding plus three-year forecast and
- The BP21 three-year forecast inflated by CPIH (2%) to show 2021/22 prices.



## Gas Distribution Networks

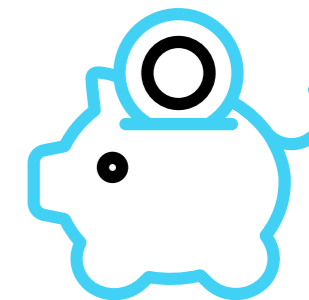
For our Gas Distribution Network (GDN) customers, the projected MTB baseline charges for 2022/23 is forecast to reduce by £0.7m from the 2021/22 position which is consistent with BP21.

In 2023/24 MTB costs are forecast to increase by £0.9m when compared to BP21 as Information Security and CMS run costs are introduced.

The investment charges for GDNs are £6.4m for 2022/23. This is a reduction of £1.2m from the first draft and reflects the latest view on Decarbonisation funding (£3m to £1.8m). This has also impacted investment charges in 2023/24 and 2024/25 which have reduced by the same amount.



Figure 17



# Customer Constituency Funding

## Independent Gas Transporters

In this draft of the plan we have reflected an updated split of meter points between IGTs and GDNs which drives the allocation of charges in a number of service areas. The IGT meter point share has grown at a higher rate than the GDNs and as a result the projected MTB expenditure for all 3 years is £0.02m higher than the first draft. In 2023/24 MTB costs are forecast to increase by a further £0.02m when compared to BP21 as Information Security run costs are introduced.

The investment profile for IGTs has increased by £0.04m per year as a result of DDP Core releases being reclassified as investment and a revised funding split based on the number of drops per customer.



Figure 18

## Shippers

For our Shipper customers, the projected MTB expenditure for 2022/23 is forecast to reduce by £0.6m from the 2021/22 position. The overall charges for 2022/23 are £0.3m lower than the BP21 value.

The investment profile for Shippers continues to be dominated by CSS which remains at £8.5m for 2022/23.

MTB has increased by £2.9m in 2023/24 against the BP21 position. This is due to the CSS run costs which are wholly funded by Shippers, which have increased by £0.5m from BP21. In addition, the introduction of Information Security run costs in MTB and CMS run costs account for the remainder of the increase.



Figure 19



# Customer Constituency Funding

# Glossary

## National Grid

For National Grid, the projected MTB expenditure for 2022/23 is forecast to reduce by £0.3m from the 2021/22 position and is consistent with the BP21 value. MTB costs rise by £0.3m in 2023/24 resulting from the inclusion of Information Security run costs.

The majority of the investment profile variances for National Grid relates to the Gemini roadmap and beginning the next phase of modernisation for the Gemini system and services. We have also made adjustments in this draft to reflect updated investment funding splits for Timely and Open data and REC Change Budget.



Figure 20

API	Application Programming Interface	DSC	Data Services Contract
AUGE	Allocation of Unidentified Gas Expert	FWACV	Flow Weighted Average Calorific Value
BEIS	Department for Business, Energy and Industrial Strategy	GDN	Gas Distribution Network
BP	Business Plan	GDPR	General Data Protection Regulation
BSI	British Standards Institution	GES	Gas Enquiry Service
CDSP	Central Data Service Provider	GRDA	Gas Retail Data Agent
CE	Customer Effort	ICS	Institute of Customer Service
ChMC	Change Management Committee	IX	Information Exchange
CoMC	Contract Management Committee	LDZ	Local Distribution Zone
CMS	Contact Management Service	MRA	Master Registration Agreement
CPIH	Consumer Prices Index including owner occupiers' housing costs	MTB	Maintain the business
CR	Change Request	NDM	Non-Daily Metered
CRM	Customer Relationship Management	NPS	Net Promoter Score
CSS	Central Switching Service	OTD	On-Time Delivery
CSSC	Central Switching Service Consequential	PAC	Performance Assurance Committee
C2S	Cost to Serve	PAFA	Performance Assurance Framework Administrator
CV	Calorific Value	PIS	Post-Implementation Support
CX	Customer Experience	REC	Retail Energy Code
CXTP	Customer Experience Transformation Programme	RECCo	Retail Energy Code Company
DDP	Data Discovery Platform	RFT	Right First Time
DES	Data Enquiry Service	SPAA	Supply Point Administration Agreement
DESC	Demand Estimation Sub-Committee	TOTEX	Total Expenditure
		UKCSI	UK Customer Service Index
		UNC	Uniform Network Code

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xserve