



Xoserve

12th July 2022

Re: 2023 Business Plan (BP23) – Principles & Approach Document

Thank you for giving us the opportunity to review and provide feedback on your approach to BP23.

We appreciate the improved layout of the document, and the additional clarity that it provides to your customers. We would suggest, that for future documents, an A4 print friendly version is also provided.

Your document talks about initiatives including *simplicity, clarity, assurance* and *value*, this is welcome as these are areas that we have been asking for focus on, and the addition of the new service area in relation to Central Switching Service (CSS) costs is in keeping with this. We appreciate that these areas of focus are aligned to the feedback from ourselves and other customers, especially as this business plan is the first of the new RIIO period.

We look forward to continuing to work together to support the successful delivery of the CDSP services and industry project (previously known as investment) areas. Now that Xoserve has had a year of working with Correla delivering a number of DCS services on their behalf, we are keen to see continued building on this key relationship to ensure seamless delivery of all focus areas.

We agree with the principle that Xoserve should be opening up data, whilst always recognising that there is a need to minimise any increased cyber security risks, however we ask that two key principles remain considerations. Firstly, that opening of data still ensures GDPR compliance with the level of data and its use being appropriate to requests. Also, where there is a request for detailed data, that the request has a legal basis. Secondly, we also request that any spend in relation to cyber security is appropriate to the requirement, with justification of reasoning and cost provided, as we are mindful that this is an area that has already seen considerable investment over recent years.

We are pleased to see focus and commitment in relation to both the decarbonisation landscape as well as the business-as-usual changes, and for the latter we ask that changes to support approved Uniform Network Code modifications are prioritised for the post CSS releases.

We believe that all the investment areas continue to meet industry requirements and look forward to reading about these in more detail in the main BP23 document in due course.

Yours sincerely,

By email
Tracey Saunders
Market Services Manager