

Question 1: What else should Xoserve take into account in respect of potential impacts/benefits for customers and consumers?

N/A

Question 2: What are the key risks and issues you are facing? How do you feel these could be mitigated/addressed by Xoserve?

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).

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.

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.

Question 3: 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.

N/A

Question 4: Do you think that our approach offers sufficient engagement opportunities for your organisation? If not, what other engagement opportunities would you like to see?

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.

This could be achieved through further 'information sharing' interactions to facilitate relationship building and to allow IGTs to provide more regular input.

Question 5: In considering a proposal by Correla to fund some of the investment in Exceptional Customer Experience, what would your main considerations be?

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.

Question 6: 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?

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.

Question 7: 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?

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.

Question 8: Is there anything else Xoserve could do to support the CSS rollout or REC implementation?

Again, further Xoserve engagement with customers and IGTs in particular to better understand our requirements regarding the CSS rollout and REC implementation.

Question 9: What else should Xoserve consider in support of Government or Ofgem initiatives including the Decarbonisation agenda?

N/A

Question 10: Do you agree with our planning assumptions? Please tell us if you think that we should be adopting different assumptions when we prepare the draft Plan.

Regarding assumption: *"We will use BP21 plus our Q1 forecast as the baseline for formal change control tracking purposes when developing BP22"*- 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.

Regarding assumption: *"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"*- This approach is welcome, as much foresight that can be provided to IGTs in advance of the planning cycle the better.