



Energy System Digitalisation Team
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Email: digitalisation@ofgem.gov.uk

Dear Charles Clark,

DATA BEST PRACTICE AS A CODE OBLIGATION

Xoserve welcome the opportunity to respond to the Data Best Practice (DBP) as a Code Obligation consultation. We are responding as the Central Data Services Provider (CDSP), which is the Central System Delivery Body (CSDB) for the gas industry.

As the CDSP, we are responsible for managing and maintaining the gas industry's central data systems which underpin critical processes, including metering, billing and settlement. Xoserve's role is to provide a single, consistent point of service for our customers and make sure their data is shared securely through well governed data processes to an expanding audience. We have valued the opportunity to be included in the Cross Code Digitalisation Steering Group and look forward to our continued engagement with the Digitalisation team and other stakeholders, which will be required to implement the necessary UNC, IGT-UNC and DSC modifications within the condensed timescales proposed.

In this response, we outline how we are supportive of the use of CDSP data to foster innovation. We aim to play a co-ordinating role across the sector to maximise benefits and minimise duplication as more parties become subject to data and digitalisation licence conditions. We acknowledge that this consultation aims to embed a standard model for DBP across all codes and CSDBs. However, to effectively implement DBP objectives within the gas sector we have recommended some amendments to the legal drafting within our response, to ensure that the intent of this consultation is realised. The substantive points of our consultation response are:

1. We recommend transferring the licence obligation from the proposed Gas Transporter Licence condition A9, which is currently switched off, to A11, as a temporary solution ahead of Code Management licencing being implemented.
2. Licence conditions and code modifications should be introduced simultaneously within the UNC and IGT UNC.



3. The CDSP will initiate activities and implement principles to incorporate DBP into our data architecture. We will also consider the impacts of this on Project Trident.
4. The licence condition as drafted should be updated from “best endeavours” to “reasonable endeavours”.
5. Success in the gas sector is a clear understanding of which data sources master which data concepts, and a cohesive understanding of the information held within them.

We hope you find our thoughts above and our question-specific responses useful. We look forward to working with Ofgem and other code parties to ensure an effective and successful implementation of Data Best Practice.

Kind regards,

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Do you want your response treated as confidential?	No

Section 2 – Intent behind the Proposed Changes

Q1. Do you agree with our intent to expand DBP Guidance into the codes?

Yes, we support the proposal to expand Data Best Practice (DBP) Guidance into the codes. We are aligned with the overall intent of the consultation and strongly support efforts to improve accessibility and understanding of gas data to enhance innovation across the sector.

We believe that interoperability is essential, and aligning data definitions and practices across the sector will be key to achieving this. Xoserve aim to play a coordinating role across the sector, ensuring minimum duplication and transparency of data ownership. Consistency in how data is managed and shared will help streamline processes and reduce complexity for all stakeholders. However, whilst we are supportive of DBP the complexity of implementing this at CDSP level should not be underestimated, and we foresee that this would be a long-term project.

To ensure successful implementation, we recommend close coordination with Ofgem's Energy Code Reform team. This will help ensure that the DBP principles are effectively embedded within the Code Manager licence, supporting the expansion of DBP and digitisation across industry, and ensuring long-term governance and compliance.

Q2. Do you agree with the proposed deadline six months after the licence condition is applied for consequential code modifications? If not, please state your reasons specific to the relevant code and modification process.

While we support the ambition behind the proposed six-month deadline, the feasibility of this should be carefully considered given the competing priorities of other in-flight deliverables, other modifications currently proposed, and the overhead of other industry change programmes across the energy sector e.g. MHHS. Furthermore, we would recommend that this is implemented into UNC, IGT-UNC and DSC modifications simultaneously.

Whilst the licence conditions are being applied into code modifications Xoserve will start setting out a plan on how we would prepare to adopt processes to adhere to the DBP principles. With the aim of being able to comply with at least principles 1-10 when required to by Ofgem, but we would have to be conscious of competing industry priorities.

We recognise the importance of moving at pace and collaboration across the industry to achieve this goal. Xoserve are committed to working to make it happen.



Q3. Do you agree with the minded-to position that an obligation to produce DSAPs is suitable and proportionate for code bodies? If not, what alternative would you propose to achieve the same or greater benefits?

We believe that the responsibility to publish a Digitalisation Strategy and Digitalisation Action Plan (DSAP) can temporarily be placed in the A11 Gas Transporter licence. In the long-term, this would be more appropriately assigned to the Code Manager, rather than the current arrangements which place this responsibility on the Code Administrator.

Additionally, we would appreciate clarification that it is intended for the CDSP to comply with DBP and produce a DSAP (given that the CDSP holds far more data than the Code Administrator within the gas sector).

The DBP principles outlined in the consultation align closely with Xoserve's internal data strategy, and alongside our Enterprise Architecture capability, we are confident in our ability to conduct an effective internal readiness project that would assess our ability to implement DBP and timelines for delivery, providing there are sufficient funds within our business plan to do so. As part of our data strategy implementation planning, we will draw on the experience of similar projects delivered by gas transporters and other industry participants over the past four years. Following this Xoserve would look to establish a dedicated project team to ensure effective delivery and adherence, where possible, to the 11 DBP principles set out in the consultation.

Xoserve has launched Project Trident - a significant project of work to modernise Xoserve's UK Link platform, estimated to be delivered between 2027 – 2030. We will consider whether DBP implementation will have any impacts on Project Trident and whether there will be any interaction or overlap between the two.

Xoserve use multiple third parties to deliver the suite of services provided. In delivering DBP, we would expect to embed a triage process, where each request is assessed against clear criteria. A reason would be provided where data requests cannot be met. We expect that some requests which fall under Principle 11 - "Treat all Data Assets, their associated Metadata, and Software Scripts used to process Data Assets as Presumed Open" would inevitably be withheld following triage as some software scripts are the IP of our external suppliers, but with appropriate governance and oversight, we are hopeful that we can meet the 11 principles of DBP. We will also look to extend these principles into our service providers via our architecture team and architecture review board.

Section 3 - Licence Condition Changes by Code



Q10. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Gas Transporter Licence amending the UNC and IGT UNC?

To effectively implement Data Best Practice within the gas sector, we recommend some amendments to the legal drafting to ensure it applies to the right parties.

As currently drafted, the text only refers to the IGT UNC, as A9 is currently switched off for Gas Distribution Networks and National Gas Transmissions in the Gas Transporter licence. Therefore, we propose temporarily adding the licence requirement to Standard Special Condition A11, paragraph 6(c) of the Gas Transporter licence. A11 obliges the licensee to establish a code administrator for the Uniform Network Code, which includes governance of the DSC arrangements within it. We propose these include DBP Guidance, and the publication of DSAPs to a schedule as found in the DSAP Guidance published alongside this document. We feel strongly that following the implementation of code reform this obligation should fall on the Code Manager to ensure that all CSDBs comply with the obligation.

We recommend revising the proposed legal drafting from “best endeavours” to “reasonable endeavours,” as this would provide a more proportionate obligation. It would also reflect the significant work needed to make data accessible using a phased approach which has been adopted by the Gas Transporters in their compliance with DBP.

As currently drafted, the obligation would fall to the Joint Office, which holds very limited data. Following discussions with industry stakeholders, we believe the intent of this responsibility should be assigned to the CDSP. Therefore, alongside the proposed changes above, it should be clearly signposted that the very limited data the Joint Office hold is not the primary intent of the licence condition.

Xoserve is governed through a Data Services Contract (DSC) which is an ancillary document to the UNC. There would need to be DSC changes to direct the CDSP to produce a DSAP.

We would strongly recommend that the DSAP obligation be implemented into the UNC and IGT UNC at the same time to help align data strategy across the sector. As the CDSP for the gas industry, we provide data and services to both GTs and IGTs and misalignment in obligation could be costly and inefficient. Ultimately both obligations should be combined into the Gas Network Code Manager licence conditions.