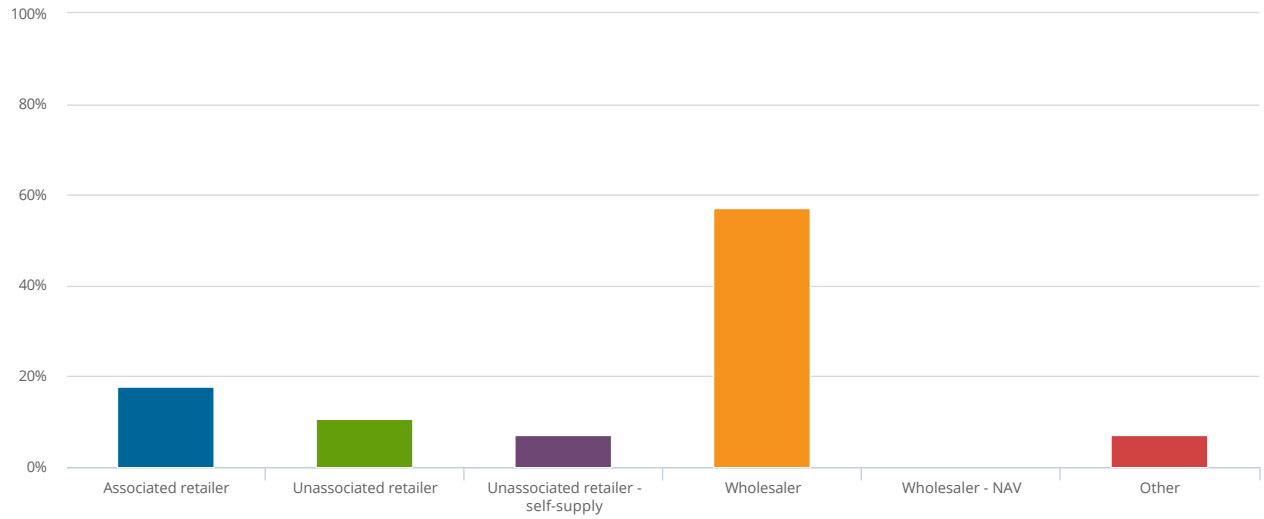
Type of organisation:

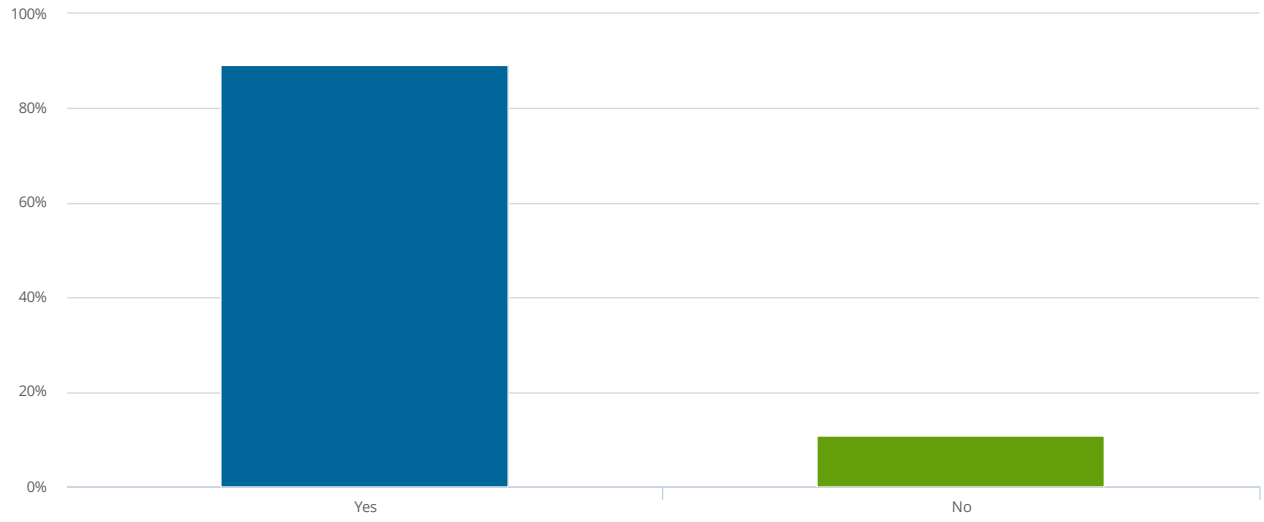


1	**Associated retailer**	5 (17.86 %)
2	**Unassociated retailer**	3 (10.71 %)
3	**Unassociated retailer - self-supply**	2 (7.14 %)
4	**Wholesaler**	**16 (57.14 %)**
5	**Wholesaler - NAV**	0 (0 %)
6	**Other**	2 (7.14 %)
	Responses	*28*

Overall MO charges

The business plan aims to drive efficiency in order to reduce the cost of delivering core services as well as phasing the improvement programmes to reduce the cost impact on year one. This enables a reduction in Market Operator (MO) charges of 1.1 per cent for 2021/22, which includes both the base cost and year one costs for the current proposed improvement programmes.

Q1 - Are you supportive of the overall level of MO charges proposed for 2021/22?



1	**Yes**	**25 (89.29 %)**
2	**No**	3 (10.71 %)
	Responses	*28*

If no, please provide a reason for your response (if yes, please write N/A):

N/a

Yes, we are supportive of the overall level of MO charges proposed for 21-22. We are encouraged by the continued evolution of MOSL's Business Plan in terms of planning and the level of detail available to members. We also note the efforts MOSL has made to drive efficiency as part of normal operations. As per previous feedback we would encourage MOSL to continue to balance the challenges of cost reduction with the aspiration to be the best in class market operator. MOSL being the best in class provides the most benefit to customers and trading parties in the long term. We note MOSL's section in regard to funding the plan for 21-22 and appreciate the efforts to reduce cost pressures in 21-22 for trading parties. We are supportive of using reserves in exceptional circumstances for this purpose. Where there are not exceptional circumstances such as a mandatory programme or a global pandemic, we would expect the surplus reserves to be returned to trading parties.

MOSL has stated clearly in the Plan and the preface that it recognises the importance of driving efficiency in order to reduce cost of delivering core services. Last year we accepted that MOSL needed to increase costs to work towards this aim, but we anticipated that we would start to see Market Operator charges decrease as a result of this investment and at a rate greater than the 1.1% proposed. Even before COVID-19, Retailers had to operate on very tight margins and as we know the retail price controls didn't include any allowance for market operator charges, which means that every pound saved is important. This situation has been further exacerbated by the pandemic which has placed an increased strain on all Retailers. In the year ahead we will undoubtedly see many customers go out of business and many more unable to pay their bills. Retailers will be expected to bear this burden for NHH customers and at this time it's impossible to predict the scale of the challenge faced. With that in mind we would ask MOSL to look again at its budget and ambition for 2021/22, to ensure that the activities proposed are 'must-do now' and that the proposals fully recognise and reflect the economic environment that market participants are facing into. We have particular concerns about the increase in the number and average salary of staff members, as this does not appear to be consistent with lean organisational principles. The business plan for 2020/21 anticipated a need for 64 FTE, this increased in the year to 66 and the Plan proposes to employ an additional 3 FTE in 2021/22. We are concerned that the anticipated complement of 69 FTE will become the new baseline and the associated costs will become the new norm. Furthermore, some of the improvement programmes funded through the 2020/21 Business Plan are not as far advanced as we had expected, this includes the strategic metering review and channel management (details are in the response to question 2). It appears we are being asked to fund activities from this year's budget, that we had assumed would be completed in 2020/21. This also appears to be the case with the 2020/21 MPOP commitment on data cleansing activity?

N/A

N/A

N/A - although it seems appropriate to us that the underspend from last year should be used in full to offset the predicted budget for this year.

N/A

It's pleasing that MOSL have recognised the current economic challenges faced by trading parties and have reflected this in the reduction of MO charges.

N/A

n/a

We are supportive of the overall level of MO charges proposed (1.1% reduction) and agree with the explanation that the cost of the core work can be reduced through efficiencies due to changes in ways of working. This coupled with using funding reserves to support the additional costs of implementing the Bilaterals project sounds very sensible.

Whilst we are supportive of the fact that charges have reduced by 1.1%, we would observe that much of this is as a result of saving made due to COVID and the amount of assurance work that could be undertaken. Headcount increased during the period and cost pressures are likely to materialise post COVID. We are greatly encouraged by the tone of the document and the focus on meeting these cost challenges moving forward.

N/A

N/A

N/A

N/A

Yes - we are supportive of the reduction of market operating costs of 1.1%. The Business Plan emphasises the drive towards efficiency with the 'Cost to Serve' programme. The use of technology to drive down costs and time spent on tasks seems sensible and will enable automation of tasks.

n/a

The current economic conditions for all trading parties and businesses remain very challenging and hence we are very pleased to see this reduction in MO charges. We appreciate the efficiency efforts that MOSL are making and the balanced approach that is being taken with respect to base costs and market improvements.

We have answered 'no' as we are unable to proceed with our response unless we select an answer. However, we feel this overall question is not applicable to [redacted]

N/A

Yes, we are supportive of the overall level of MO charges proposed for 2021/22. Note: [redacted] recognize the cost and phasing of MOSL improvement programmes through to 2023/24 has been developed in accordance with the following principles: • An average annual cost equal to, or below, the budget level for 2020/21 (£1,560k) ensuring that the programme does not create upward pressure on MO charges • Clear and transparent prioritisation between 'must do', 'should do' and 'could do' – giving members visibility over how and when we have allocated funds • Phasing in line with these priorities - ensuring high confidence of delivery and without the need for large upfront cash outlays. [redacted] are supportive of Year 1 budget (As cited in this consultation by MOSL) and on the premise that costs will reduce in future years as there is a reducing spend profile for each subsequent year. It is recognized that year 2 and 3 budgets have not been finalised.

N/A

n/a

N/A

We acknowledge that the business plan represents a saving overall and that the phasing of improvement projects (which customers and the market as a whole will benefit from) has been taken into consideration, however we would challenge MOSL to find further savings on the core services. On the face of it an £11.2 million annual budget which supports a £2.2 billion market represents a nominal transaction cost, is it possible for MOSL to provide a comparison to other similar industries? The PR19 determinations and Covid-19 have placed significant pressure on the budgets and ways of working of the MOSL's member organisations and it is likely this will continue for the foreseeable future. At times it reads as though the business plan has been prepared in isolation of the very real challenges the industry is facing just to stay alive. We are grateful for the support MOSL has provided during these unprecedented times however we feel MOSL could do more to share the burden through finding further cost savings to core services. We also recognise that the suspension of OPS/MPS charges from most / all of 2020/21 year has removed a potential source of funding for improvement projects (presumably the reason funding has been requested in the 2021/22 business plan?). Whilst it is commendable to see the level of effort which has gone into producing the detail set out in this 3-year business plan, the document itself is perhaps too weighty and could benefit from being more concise (4-5 A4 pages in total). This principle could also be applied to some other non-change proposal related communication documents which MOSL produce.

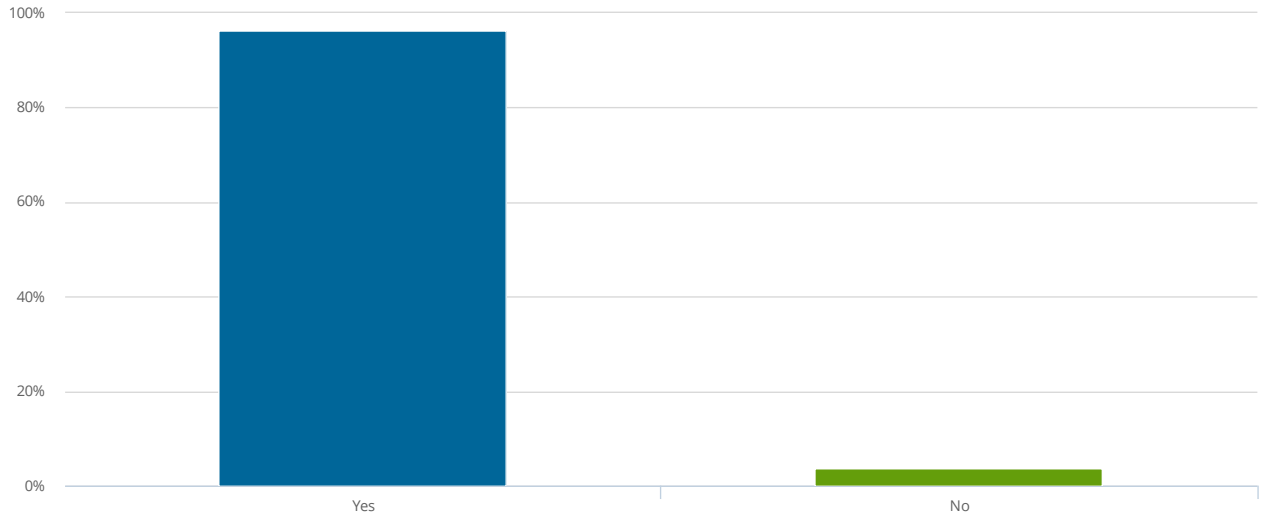
N/A

Whilst we are supportive of the overall level of MO charges proposed for 2021/22 to assist in the delivery of the proposals and priorities set out in this business plan, we would identify that any increase in costs during the on-going pandemic is not without issue for trading parties. We strongly encourage MOSL to ensure the effective delivery of cost-saving changes to ensure that any short term increase in MO charges can be netted off with improvements elsewhere. We note that many of the priorities contained within the business plan remain the same as in previous years. Whilst we are encouraged once again by MOSLs commitment, further increases to MO charges and budgets should be evidenced by tangible improvements against these goals.

Proposed Improvement Programmes

The business plan sets out a three year roadmap for improvement and delivery of MOSL's strategic priorities through 10 key improvement programmes.

Q2 - Do you consider that these improvement programmes are the right areas of focus?



1	**Yes**	**27 (96.43 %)**
2	**No**	1 (3.57 %)
	Responses	*28*

Q3 - If you agree that these are the right areas of focus, are there any programmes where the phasing should be changed i.e. brought forward? If so, what are the drivers for the proposed change and what elements of the current plan do you think should be delayed/removed in order to fund any additional activity and ensure it remains deliverable?

If you disagree, are there any additional programmes that should be added to the plan, or existing programmes that should be removed?

Channel Management, it would be helpful if a list could be published on the website as soon as possible of contacts at MOSL, which email address covers which area as we are never sure who we need to contact regarding various queries and questions, also an area for all the RWG information. This would be helpful Whilst you are working on the new website. Overall, we are happy with the plan and look forward to seeing the improvements especially the phasing in of the bilateral System this year.

We agree the improvement programmes are the right areas of focus, however we would offer a number of observations. We are pleased to see MOSL publish a three year business plan. It is helpful for us as a trading party to have early sight of future plans. This helps us with our planning and offers a level of certainty. We note the 21-22 plan includes a high level breakdown of the costs associated with Market Code Changes. We encourage MOSL to continue to understand these costs and evaluate the benefits of individual code changes. It is vital that well-articulated and developed changes are progressed quickly where there is a material impact on the market. We note the Market Code Review forms part of the Business Plan, however, we do not believe this should be progressed until such time as there is a wider review of the market structure. To do a review without first reviewing and updating the market setup would simply be tinkering around the edges without first addressing the core elements that cause market wide issues. We believe with three years of market operation, responsibilities for vacancy management, meter reading services, operational matters and debt management require review from a structural perspective. Unlike the Market Code Review, we appreciate that such an initiative would not solely be within MOSL's gift, we would encourage MOSL to drive these conversations. We see the Strategic User Forum as an platform to evaluate further. Under the section on cost to serve efficiency, we would encourage MOSL to also consider services to trading parties where there are repeated costs across individual trading parties, and where services could be provided centrally in a more cost effective way. For example, MOSL could consider providing a centralised settlement service between Wholesaler and Retailer following settlement runs. With the COVID 19 pandemic and the difficulties the market had in adjusting to the challenges, we would expect the Business Plan to feature a review of the impacts and evaluating ways to combat future issues which require functionality to reduce over inflated estimates, or reduce charges in a manageable way. The analysis of COVID vacancy will impact for some years to come and we note the imperfect while much improved approach to YVE adjustment. We would also expect to see specific work being carried out on COVID 19 recovery. We do not believe that any programme should be brought forward in 21-22. This is primarily on the basis that all focus should be on delivering the Bilateral Solution. This will be the biggest single change since the market opened in April 2017 and arguably a bigger impact on operations for trading parties. To bring anything else forward would put at risk the focus on delivery and implementation of this system. This will require engagement from all trading parties and from MOSL. In addition, trading parties will also be dealing with XSD changes associated with CMOS releases planned for 21-22 and supporting a COVID recovery. While the MOSL Business Plan provides the cost of each programme and the phasing, it does not quantify the value of the benefits in order to make an assessment for bringing a programme forward. The only quantification is associated with modernising of systems (stage one) which delivers a £115k benefit the following year. Without this level of information for all programmes it is difficult to make a case for bringing programmes forward. However, subject to the significance of the bilateral solution we believe the benefit of modernising systems does not outweigh the risk. We consider the costs for some of the improvement plans appear low in relation to the size and potential complexity of the improvement. We would welcome confirmation of a level of certainty on the costs provided, with a need to avoid future financial 'shocks'.

We agree that these are the right improvement areas, but we'd question whether the timing is right to start all of these activities now, and if so, whether the business case and return on investment are as strong as they possibly can be against the backdrop of the current economic climate. If MOSL can demonstrate a strong business case with tangible benefits, financial and non-financial, which will improve the future effectiveness and efficiency of the market, then we'd be happy to support the proposals. Our key challenge is whether they truly represent value for money. We also have some concerns that some of the deliverables were previously promised in the 2020/21 Business Plan and funded from the 2020/21 Budget. Our views are presented below on each of the proposed improvement programmes: Bi-lateral transaction programme - currently the financial cost of this programme sits under market improvement but it is unclear if the costs stated for 2021/22 include both the programme costs and the running costs for the solution. At some point the solution will become a core service deliverable so while we can see that during the business plan period the programme costs reduce, will there be an increase in the cost of core service delivery as a result of the new bi-lateral solution? Strategic metering review – [redacted] was, and remains, supportive of the strategic metering review. This was a consistent area of concern raised by CEOs at the 2019 MOSL CEO Forum and featured repeatedly in the CEO Survey. Our expectation of the review was set in the MOSL Business Plan for 2020/21 which stated it "makes 2020/21 a year that delivers a step change in this area." In approving the 202/21 plan, we assumed that the review would have been completed, recommendations made and improvements put in place by the end of the 2020/21 financial year, in advance of this "step change". However, the 2021/22 business plan implies that the review is not yet complete and that the market will not be seeing any immediate changes; instead any proposed improvements will be phased over the remaining period of the draft business plan. From reviewing the objectives for 2021/22 it suggests that there will be more review and planning undertaken but no delivery. The strategic metering review was a central tenet of the MOSL 2020/21 Business Plan and a firm commitment was made that improvements would be delivered. It is disappointing that we're not going to see any quantifiable benefit from it in the forthcoming financial year, and that we're being asked to fund a further year of the review without any clear outcome or proposals on future cost reduction. It is also worth noting that the only stated deliverable in this area is a commitment to improve data quality, but this was a MPOP 2020/21 commitment which was funded from the 2020/21 Business Plan. Modernisation of market facing systems – We have a concern that less than four years into a new market, MOSL considers that the market facing systems need to be modernised. The draft business plan states that the MVI is a growing area of use, but both the LVI and HVI are the main market facing systems and if investment is required to future proof systems should these not be prioritised ahead of the MVI? Channel management – The draft business plan is looking to build upon the Channel Management Strategy and Approach developed through the 2020/21 Business Plan. However, on reviewing the 2020/21 Business Plan we were expecting that much of the work proposed for the forthcoming year would have already been delivered. The 2020/21 commitments included "through the course of 2020/21 we will implement a simplified set of communication channels to deliver our services. It will include a specific focus on how we manage and respond to queries and service requests and improvements in how we make information and data available." An example of this would be the query management tool that has been referred to in the draft 2021/22 Business Plan but which we understood was to be a deliverable in the 2020/21 plan which stated "we are working on transitioning our internal query management processes and systems towards a more service desk and case management-based approach across MOSL. This work will continue into 2020/21 and will go live as a part of the implementation of the refreshed query handling service" Data insight – while we remain supportive of much of what is proposed here, we have a concern around the reference which says "Providing access to rich analytical tools". Retailers have developed their own analytical capability which allows them a degree of competitive advantage and we're concerned that this functionality isn't core to the purpose of the market operator. Is there a specific purpose that this will be used for? Code simplification – While we are supportive of the principle of code simplification, and demonstrate this through our representation on the Code Advisory Group and the Panel, we must ensure that any work in this area in 2021/22 is demand driven and does not incur additional unnecessary cost, for example if it only comes from the red line changes resulting from code change proposals.

To feedback on the phasing of the plan it would have been useful to understand the strategic risks first. Excepting this, the phasing seems reasonable and as indicated should be kept under regular review and flexed where appropriate. As per previous years we counsel MOSL targeting really effective delivery of a smaller number of projects rather than less effective delivery of a greater number of projects. The 10 projects identified seems a reasonable and realistic number to deliver well.

[redacted] would value data insight as a foundation for other work as set out in the business plan to follow. No additional funding would need to be sought it is simply the prioritisation of the proposed work. We feel that this work needs to be undertaken first in order for effective delivery of the following schemes.

We have a number of observations on the proposed improvement programmes. It has been demonstrated that data is an area that impacts all trading party performance and the efficient operation of the market so we believe this needs to be given more urgent attention. Market code simplification could be deferred to concentrate efforts on data. We believe the Metering program is also a high priority with the timescales depending on the proposed outcome, i.e. if it is intended that the resulting actions would impact Wholesalers business planning for 2025 this program should be escalated. There are many issues in the market that are related to poor meter read data. The sharing of consumption data needs to happen before 22/23 and the responsibility of meter reads needs to be reviewed quickly. The plan suggests 21/22. Accurate meter data feeds into the Water efficiency initiatives which depends heavily on accurate consumption data

---

As a Trading party in the non-household (NHH) market and a shareholder of MOSL, we thank you for giving us the opportunity to comment on MOSL's 2021/22 Draft Business Plan and Improvement programmes to 2023/24. We would like to express our full support for both the Business Plan and the Improvement Programmes. We

think that the plan put together by MOSL is comprehensive and ambitious, and we welcome the visibility provided by the 3-year roadmap. We are very grateful to have had the opportunity to share our views on some major topics (core data cleansing, strategic metering and Code change governance) through the different Requests For Information (RFI) launched by MOSL at the end of last year. We greatly appreciate the fact that our contributions have been thoroughly considered by MOSL and are reflected in the plan and roadmap. We are also very supportive of the method used to define the different improvement programmes, in particular the emphasis on how trading parties and customers will benefit from them. We do not see at this stage the need to amend the phasing, but we would like to highlight three areas which we think need thorough attention: 1. Data quality (including incorrect YVEs and vacancy flags): this item should not be considered in isolation, but in the context of market processes from which the data is generated and whose enhancement should therefore be considered a priority. 2. Code core purpose: the current Code was established quickly and in the interests of establishing a functioning market. The opportunity to enhance against a clearly defined set of Code purposes, with the ultimate goal of delivering the right outcome for the End customer, remains. Reorganisation of the Code should therefore prioritise the clear definition of the purpose of the Code. 3. It is a priority that the different programmes are articulated and connected, keeping in mind that the ultimate goal is to maximise the benefits for both End Customers and Trading parties. Finally, most improvement programmes (such as data insight and cost to serve efficiency) are transversal. Outcomes from these programmes could bring collective benefits if shared on a regular basis with the Panel and Trading parties and used to reconsider the priorities of each programme. Such an approach to the improvement programmes would be in line with MOSL's on-going drive for an improved and efficient market.

Data improvement and the bilateral transactions programme are the two key areas where we believe focus should be prioritised. Where possible these programme timelines should be compressed so that we can realise the benefits as soon as possible. We welcome the strategic metering review and agree its another key area of focus, specifically around the incentive framework which currently doesn't drive the right behaviours.

Bilaterals is of significant importance, and this is already at the forefront of MOSL activity - spot on. Ensuring processes are seamless will provide a much enhanced customer experience. For me, accelerating the strategic metering programme is key also - quality and 'fit for purpose' metering data provides the foundation for so many market processes. From speedy leak identification, to accurate billing and water efficiency drives, having regular data is a must. With so many Wholesalers lacking a proactive meter replacement programme, understanding plans to address and roll out smarter technology is of upmost importance.

Data is key and all focus should be on improving this area intially.

The improvement programmes listed cover the keys areas we had expected to see and are in line with the discussions we have had at our recent performance meetings, RWG and the Strategic User Forum. Our key areas of focus are Bilaterals, Strategic Metering Review and Data Insight, all of which include a range of projects that we would expect and planned in a timely way. Overall, the improvement programmes indicate that changes will be manageable for the industry and for us as a Wholesaler, we welcome this at this stage of the market forming. We can only identify 9 improvement programmes on the document though, it would be helpful to see a clear overall roadmap with all the timings on one image. We would suggest considering making Market Governance a 'should' rather than a 'could' as there looks likely to be benefit to all with better governance giving the opportunity to make work more efficient. The phasing looks sensible allowing the industry as whole to manage change at a pace that is achievable and delivering for the end user. It reads that the industry will be continuing to improve and build on earlier work rather than heading in a different direction.

We believe that the business plan has focused on right areas. The bilateral project has to be prioritised and we are of the view that the overall plan should not detract from its delivery. We do not believe that further programmes should be brought forward until we are confident on the delivery of the bilateral project is assured. In relation to the bilateral project, we are pleased to see the progress being made but note that the 2 to 3 year timeframe will only deliver the first 32 workstreams. We are not clear as to what will happen to the remaining workstreams past the fact that there will be a review at some point in the future.

N/A

We agree with the areas of priority. We welcome the three year plan to provide clarity and foresight for trading party planning. The engagement around the improvement programmes in next year's plan has been good and we would ask that this continues for the programmes later in the plan. The one area where we feel more definition is required, in particular in terms of understanding and articulating the issue more clearly, is "Code Simplification". Previous questions to trading parties have been particularly broad which could be interpreted as looking for a problem to solve rather than being aware of a particular issue that needs attention. Perhaps the first step would be to gain broad agreement as to the issue and the impact that it is having on the market and customers. Given the amount of activity underway we need to be confident that the time and investment in this activity will deliver benefits.

N/A

N/A

We are pleased to see lots of references to water efficiency in the Business Plan and it seems to be particularly embedded in the data and metering programmes. We support the Data Insights Improvement Programme and agree this information will be very useful for the water efficiency field and beyond. It could provide very useful information for wholesalers (in WRMP planning and delivery), for government and regulators in tracking progress on NHH demand management, for water users and trade bodies in benchmarking and for stakeholders like [redacted]. Better data for the non household market is outlined as required to take the water efficiency agenda forward in the RWG Retail Action Plan for Water Efficiency. MOSL's data insights could satisfy this requirement. It would be beneficial if this work programme examined how and what consumption data will be made available to stakeholders wishing to use it. We support the strategic metering review. We believe it is crucial that NHH water users, wholesalers and retailers have easy and regular access to NHH water consumption data.

We support the current proposal

We are comfortable with proposed programmes and the phasing/priorities proposed. Our main comment is the need to remain flexible, and be both willing and prepared, to adjust programmes as the market moves forward. This is particularly true whilst we are still in uncertain times resulting from the on-going Covid-19 pandemic.

We are pleased to see the increased focus on customers in the 2021-24 MOSL Business Plan, with the drive towards a retail market that delivers the best outcome for customers. We welcome each improvement programme setting out how customers will benefit. There is a long way to go to address the main issues in the market, many of which have been around since the market opened in April 2017. It is important to turn the plan into swift actions. Through our input [redacted] on the Market Codes Panel, membership on the Market Performance Committee and various industry working groups we will work to ensure the actions deliver the best customers outcomes. We are keen to continue to work with MOSL, both bilaterally and through the Market Codes Panel, in particular, to explore how we can best use our collective data to inform customers and improve performance within the market.

There needs to be a focus on not extending the timeline for the bilateral hub, the current plan is 3 years and this needs to be achieved. We welcome the review of the responsibility of inputting meter reads, as a retailer who suffer from other's failure to effectively manage this service. We do not support the comments on considering cyclic estimates from retailers and feel this is only on the agenda because of pressure from retailers struggling from COVID. This is not a step forward for the market and will encourage data manipulation and poor behaviours. We welcome the plan for a query management tool and feel this would be an excellent addition to the

market. We welcome the financial projections and budget management detailed in the business plan.

Yes, we agree that these are the right areas of focus and would particularly agree with the organizational capability table MOSL have produced which prioritizes the service excellence and market improvement areas which have been categorized as 'must do', 'should do', and 'could do'. The primary importance of the Bilaterals hub is considered by us to be essential while 'channel management'; 'modernization of systems'; 'Cost to serve efficiency'; and 'strategic metering review' would carry a higher prioritization over the remaining programmes. Specific elements of each programmes which we believe should be considered to be changed or brought forward when considering the nine improvement areas are included below: • Regarding 'Channel Management' and Bilateral hub considerations, we propose that a single sign off should look to be incorporated in year one of the business plan, and not year two, given 80% Bilaterals functionality is expected to be achieved and live elements of the hub will be available for use by Trading parties from November 2021. • 'Market Governance' does not have any actions for years two and three and the statement within the plan proposal that the "governance review is completed' in 2020/21 is considered premature given the unresolved complexity surrounding the NHH Open Market. The ambiguity, confusion and disagreement around the roll, responsibilities and authority of Panel, Sub Panel, MOSL Retailer Wholesaler Group (RWG), Forum groups and other stakeholder parties still requires branch and root review.

Metering and Market Performance Framework

Overall the plan is understandably focused on transaction improvement as this can be a key barrier to the successful operation of the market. We believe more activity is required to promote the market and further clarity on MOSL's role in this could be included in the business plan. We would also provide comments on the following more detailed areas: Meter Reading – as highlighted in the business plan metering is fundamental part of a well-functioning market. The responsibilities for meter reading are part of the scope for year 1 – we believe part of this work should be reviewing whether these activities should move into the remit of Wholesalers and to highlight any cost and service implications of this. Data – we would encourage MOSL to consider mapping key data sets (e.g. premise/property data) to third party data sets such as Address Base. We believe MOSL should also encourage a consistent industry approach for data collection and validation - e.g. grid references or use of new technologies/approaches such as 'what three words' for property and meter locations. Photos of all meter reads would also help to validate the accuracy of meter readings. Vacant properties – we believe the industry needs better processes and incentives to minimise the level of vacancies. MOSL could help coordinate a review in this area.

We would like to see the Market Code simplification being undertaken alongside the Bilaterals Transaction Programme. We believe there can be efficiencies made in undertaking these activities in parallel, to prevent any repeat work on the Bilateral Programme, if that activity is delivered first. There are a number of activities in the improvement programme (Bilaterals, Modernisation of Market Facing Systems, Channel Management) relating to the upgrading of market systems. We would urge that the timing of these activities be given careful consideration, given the change management that would be required within Trading Parties.

The list of improvement programmes accurately reflects the focus areas captured through the recent Strategic User Forum sessions and are sure to add enduring value to the market. What is a little more difficult to see though is the link to future savings on the cost of MOSL core services. Are we are operating on the basis that the total MOSL budget going forward into future years will be largely static and that any savings to core services will be reallocated into improvement projects rather than returned to trading parties? If so, we would be supportive of this approach as long as there is a clear link to customer benefit and market resilience (we appreciate that each improvement project cannot be expected to benefit all individual trading parties equally but that there is a balance over time). We find it difficult to get too excited about the planned programmes of 'Channel Management' and 'Cost to Serve Efficiency' as one could argue that identifying ways of making incremental improvements to these areas forms part of business as usual (core activities) but we are supportive if this realises tangible benefits for MOSL or other members. We look forward to reading the output of the 'Strategic Metering Review', however, we do feel as though the delivery timescales of any recommendations may be restricted by wholesaler investment programmes which are already committed elsewhere. What support is MOSL planning to provide to the market over the next 3 years to assist with the thorny issue of tariff reform? Granted this is being led by the RWG however one might suggest it could benefit from significant input and co-ordination work by MOSL.

[redacted] is supportive of the proposed phasing

We broadly agree that the areas of focus identified are appropriate for MOSL and believe that the timeframes identified represent a plausible scenario to drive benefit in the market. As we have previously identified in responses elsewhere, we believe that the following criteria should be areas of priority for MOSL and the Market: • Ensuring Cost Efficiency and value for money • Improving Market Data Quality • Driving Greater Harmonisation of Wholesaler Policies, Processes and Tariffs • Increased Clarity and Simplicity of Market Codes • Improving Trading Party Performance The MOSL Business Plan seems to be broadly aligned with our priorities, in particular with the Bilaterals Project driving clear progress towards harmonisation, the Strategic Meter Review improving both performance and data quality and an overall focus on reducing costs and frictions in the market. We are also aware that this is in the context of wider market activity, such as that of the RWG, which also seeks to address the areas we have highlighted as a priority. We welcome the on-going review of the Market Codes, however believe there is additional scope for Trading Party involvement in this process and would appreciate further opportunity to provide comment or suggestion. We consider that a more flexible delivery may enable greater benefit at a shorter timescale.

Business Plan Format

Q4 - What is your view on MOSL's business plan being displayed digitally as opposed to a PDF document?

The digital display of the business plan is clear and is straightforward to use, however it did limit the ease of gathering views from across our company. Our preference would be to have an option in the digital display to create a pdf output, so it can be distributed as a central marked/commented version to add collation of views to form the response.

We are supportive of an online digital plan and note that MOSL continue to build a positive digital brand. We would like confirmation of how this will be accessed in months and years to come to allow stakeholders to review the evolution of the plan and refer back. We did note that on mobile devices certain tables were not displaying correctly. We would also suggest that MOSL publishes the consultation questions on a separate page. The current setup requires individuals to enter names in order to progress to the consultation questions . Sight of the questions is helpful to engage internally and simplify feedback.

Our view is that the most cost effective way of producing the document should be used. However, we do ask that if MOSL continues to produce digital documents, that the consultation questions are provided as a standalone document which is easily accessible.

Whilst it is a welcome addition to have the plan published in a digital format it would have been useful for a PDF copy. A further build on this is that all Trading Parties are likely to disseminate the MOSL plan in certain part of their organisations. To assist with this a summarised PowerPoint version to discuss with internal stakeholders would be helpful for Trading Parties.

Really user friendly, broken up really well. We welcome the changes to the format and believe it helps retailers and other interested parties navigate to particular

interest/concern areas. However, when attempting to complete the consultation there were issues with accessing the consultation form when accessing via Microsoft Edge, was only able to access when on Chrome. Guidance as to best supported platform would have been appreciated prior to completion.

Yes we found the digital version very easy to follow however it would be helpful if a PDF version was also available to allow you to mark up comments for your own purposes and the search the document.

We praise the innovative and interactive way that MOSL have chosen to present its business plan and roadmap, which makes them much more pleasant to read than a PDF. However, the downside is that it is more difficult to circulate the document among our internal stakeholders or to single out one piece of information. We think that a compromise should be found between the two solutions: an interactive format for the introduction and the executive summary, while the core document would be available for download as a PDF.

We like it! The plan is easy to read and navigate with a good blend of medias to keep you engaged.

Love it! Very engaging and aligns to the modernisation plans.

Excellent

It was harder to navigate the digital version than a PDF. It created complications when trying to discuss virtually, especially when screen sharing. One area in which we really struggled was having easy access to the consultation questions and having them available to share internally to collate our response. It was hard to see a map of the improvement programmes as a collective with their related timescales.

The document worked well on a desktop display, less well on mobile devices. We would prefer a PDF document but do not have a strong opinion on the matter.

N/A

The format was clear, well-presented, and easy to navigate. However when reviewing documents for the purpose of formulating a consultation response it is helpful to have a document which can be shared and annotated internally. The provision of a pdf version in addition would help. A copy of the consultation questions would also help so that questions can be considered and responses prepared prior to submission on the portal. Videos are very helpful and a welcome break to the text. A couple of minor observations: - Not all browsers support the formatting so it would be helpful to advise as to the correct browser to use. - There were a couple of links that were incorrect and trapped the reader in a loop

N/A

We would rather have a PDF version of the document.

It took a minute to work out how to navigate the digital format as the 'next' arrows don't seem to work, but once I found the menu tab it was easy to navigate. The only other downside if that you can't search for keywords throughout the whole document, only individual pages as you could do with a PDF.

Very user friendly and easier to navigate and read through. Prefer the digital version to a pdf.

We are comfortable with either format and suggest that this is largely a matter of individual preference. We see merits in the digital approach and provided the cost of production is proportionate we are happy to support this move to a digital format.

The digital display make the business plan easy to navigate, however, some of the text appeared to be overlaid.

Looks better, harder to navigate (find.)

Our view is that the MOSL business plan should not only be displayed digitally as opposed to a PDF document. Our reasons why the plan should not be displayed digitally is because: • Digital is confusing in its nature as it requires horizontal and vertical navigation of the page to see all plan specifics and cannot be understood or viewed on one single page. • The plan cannot be printed or referred to easily in meetings as a PDF • There is no overarching framework for the plan. It has not been created tying all the elements of the plan together as one model showing key linkages. • The flight path of year one and years two and three are difficult to measure with no month by month progress Gant chart to track performance and completions of tasks. • The digital plan has been seen to flicker and lose content completely on different I.T. viewing platforms and when searching for the plan via different search approaches.

Fine apart from the weblink was difficult to navigate

The digital format was easy to navigate. The option to review/print a PDF version would be beneficial.

We felt the new digital layout of the Business Plan was easier to navigate and digest. We believe this format is more user friendly than a PDF document.

Whilst the digitally displayed business plan is refreshing our preference would be for it to be presented as a pdf document as this is simpler to navigate, annotate and serves as a static record which can be easily distributed within our organisation. It would also benefit from listing the consultation questions on the back page. The online consultation form is not as user friendly as the forms used previously for MOSL's other change consultations (e.g. all questions and response fields should be on the one webpage rather than a series of pages). The business plan document could benefit from being much simpler and concise as there is excessive detail and narrative. We recognise that the detail is necessary to assist MOSL's executive team to deliver the business plan however this granularity does not need to be presented in the document. This less onerous document would be quicker to produce, read and provide feedback on. We thank you for your diligence, effort and continued support.

The digital version is good so [redacted] is supportive of its use rather than a PDF document

Whilst we welcome the addition of a 'digital' MOSL Business Plan, that presents the information clearly, we believe that the removal of an easily downloadable format represents a negative change to the process. The availability of a PDF document allows trading parties to more effectively share and discuss the information contained which better enables constructive feedback from the market. As such, we would encourage MOSL to ensure that an easily accessible PDF option is available. In addition

to the above, we would raise a challenge around the accessibility of the consultation questions themselves. Whilst we do not have issue with the use of a web-form submission, consistent with most MOSL consultation responses, the MOSL Business Plan does not identify the questions anywhere outside of this web form. This requires trading parties to click through and answer the questions before they have visibility of all questions. This is a further barrier to effective discussion of the issues contained. It is our view that MOSL should ensure that the questions are separately accessible.