RETAIL ENERGY CODE

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REC CONSUMER CONSENT TOPIC SPECIFIC SOLUTION GROUP
MEETING MINUTES

MEETING	**REC_CCTSSG_26_0422**
DATE	**22 April 2026, 10:00**
LOCATION	**By teleconference**

1. INTRODUCTIONS

The Chair welcomed attendees to the meeting of the Consumer Consent Topic Specific Solution Group (CCTSSG). This session would focus specifically on the alignment between the Tariff Interoperability (TI) and Consumer Consent Solution (CCS) projects.

2. INTERACTIONS WITH TARIFF INTEROPERABILITY

SJ provided an introductory overview of TI and its relationship with CCS. They explained that TI originated from discussions under the Smart Secure Energy Systems (SSES) programme, which identified that inconsistencies in the availability and format of tariff pricing data across Suppliers were creating barriers for flexibility service providers. In particular, the lack of standardisation made it difficult to access and use tariff data in a repeatable way to optimise consumers' energy usage.

DESNZ is addressing this through TI by creating a standardised format for tariff pricing data and requiring Suppliers to make this data available via Application Programming Interfaces (APIs). RECCo was appointed as delivery body a year ago and has since been working with DESNZ and the TI Working Groups to develop the technical API specification and the associated REC governance documentation, including a new REC schedule.

SJ noted that DESNZ is introducing a new Supply licence condition to mandate Supplier participation, with detailed obligations set out in the REC. The initial phase applies only to electricity Suppliers, not gas, and only to domestic Suppliers and larger non-domestic Suppliers above defined customer thresholds. Other Suppliers may participate on a voluntary basis.

SJ described two types of users under the TI arrangements:

- Standard TI users, who can access publicly available tariff pricing data in a standardised format. This data is not linked to a specific MPxN. RECCo maintains a central supplier register that provides API endpoints for accessing this public tariff data.
- Registered TI users (RTI users), who can access consumer-specific tariff information. This requires registration with RECCo, signing an access agreement under the REC, and obtaining explicit consumer consent. This is the key point of interaction with CCS.

SJ outlined the end-to-end TI solution. Users can either access public tariff data by identifying the relevant tariff (using standardised tariff IDs rather than tariff names), or, where Consumer consent has been obtained, request MPxN-specific tariff data directly from the Supplier. Suppliers validate consent before providing Consumer-specific tariff information.

The arrangements also introduce event notifications, allowing RTI users to receive ongoing notifications (via webhooks registered in a central RECCo register) for events such as tariff changes, price changes, change of Supplier, revocation of consent, or a Supplier ceasing participation in TI. This includes notifications where Suppliers are participating voluntarily and decide to withdraw.

SJ went through how TI interacts with CCS. A joint RECCo–DESNZ consultation was issued in November, covering the TI API technical specification and governance documentation, including the new REC schedule. Responses raised concerns about the proposed introduction of a bespoke consent mechanism within the TI arrangements.. Specifically, concerns were raised about the cost, resource burden, and inefficiency of building standalone consent solutions for TI that would later need to be integrated with or migrated into CCS, creating a risk of duplication.

In response to the consultation feedback, RECCo, DESNZ, and Ofgem have aligned on a phased delivery approach for tariff interoperability. Under this approach:

- Phase 1A will deliver publicly available tariff information only, largely in line with the original TI proposal but excluding consumer-specific tariff data.
- Phase 1B will deliver consumer-specific tariff information as a joint delivery with CCS, rather than as a standalone tariff solution. This phase is referred to as Phase 1B to align with TI terminology, noting that a separate TI Phase 2 is planned for future developments such as potential extension to gas.

The originally consulted go-live date of 01 January was met with stakeholder pushback and has since shifted, with an updated implementation window moving into February. The precise timeline for Phase 1B was noted as still under development and due to be discussed at the next TI Working Group. DESNZ confirmed that the finalised plan would be shared with tariff stakeholders first and then communicated to CCS working groups.

A member asked how TI, which includes non-domestic Customers, would align with the first phase of CCS, which is focused on domestic Consumers only. SJ noted that this point would be addressed later in the meeting materials.

A member flagged a practical concern for their organisation: they are not currently a DCC user and the Smart Data Repository (SDR) route is not yet available, so their ability to access Consumer-specific tariff data via CCS may depend on SDR being live. If SDR were delayed, the member noted the only alternative route would be DCC onboarding, which they described as lengthy and therefore something they would need to begin early if SDR timelines became uncertain.

SJ clarified the position on timelines and sequencing. They stated that CCS MMP launch remained targeted for end of March 2027, and there was no current view that this go-live date would change, although SDR-related work was acknowledged as an ongoing discussion. SJ added that Phase 1B was more likely towards the end of 2027, because additional design and development work is required and Suppliers need a defined period to build and test mandatory API capabilities once the solution and Code/technical specification are confirmed. They added that DESNZ is working on a government response to the prior consultation (due in the next month or so), which would formalise the phased position being discussed. SJ indicated that design for Phase 1B was beginning and that a further consultation on Phase 1B would be issued later in the year. They also noted that Phase 1A implementation was shown as February 2027 on the timeline slide. SJ further confirmed that onboarding to CCS would be available from CCS launch, and could occur ahead of TI go-live, with support available for organisations seeking access to both half-hourly data and tariffs.

An Elexon representative stated that SDR Phase one is still planned to go live in October this year with publication of aggregated data. They added that the intention was for a subsequent phase to go live early next year to align with CCS, enabling access to personal-level data, while acknowledging an ongoing DESNZ-led review that could affect plans, subject to confirmation.

An Ofgem representative advised that that the letter issued jointly with DESNZ aimed to be as clear as possible that the intended delay was around three months, with the scoping exercise concluding by the end of May. They emphasised that Ofgem/DESNZ were trying to keep delays to a minimum while ensuring a sound scoping exercise and avoiding unnecessary expenditure, and that they were very aware of the knock-on risks delays create across CCS, TI and other workstreams. An Elexon representative added that they were committed to feeding as much information as possible into the review to support decision-making.

MPW added context on CCS onboarding and accreditation. They also highlighted that TI and CCS each have access agreements, and work would be undertaken to make these as uniform and simple as possible. Importantly, they stated that once an organisation is onboarded to CCS, access becomes more streamlined as additional data sets become available over time; and even if a repository such as SDR were delayed, organisations could still onboard to CCS and use the tariff element first, adding other data later once available.

SJ outlined the proposed Phase 1B solution. They noted that CCS accreditation arrangements will need to be sufficiently flexible to reflect different data access risks and use cases. While CCS work to date has focused on access to half-hourly consumption data, TI introduces organisations that may access tariff data only. Work undertaken in the TI Working Group has therefore considered a more proportionate and lightweight accreditation approach for such users, and this flexibility will need to be reflected in future CCS accreditation proposals.

It was confirmed that consent under the integrated solution will be recorded centrally within CCS, with Suppliers retaining responsibility for verifying that the individual providing consent is entitled to do so. SJ highlighted the distinction between datasets and noted the requirement for Suppliers to verify account-holder consent for tariff data will remain under Phase 1B, applying consistently to both domestic and non-domestic arrangements.

From a governance perspective, SJ advised that the integrated approach aligns with Ofgem's direction to deliver a centralised consent solution and avoid fragmented consent models. It also aligns with the Digitalisation Framework, which envisages CCS supporting multiple smart data initiatives, including SDR. Integration is expected to reduce duplication, enable a single consent implementation for Suppliers, simplify access arrangements for users, and minimise delivery costs.

SJ outlined the key next steps as:

- Defining the integrated TI consent solution within CCS by mapping the end-to-end customer journey, recognising the differing policy positions for account holders providing consent for access to tariff data and occupiers providing consent for access to half hourly metered data.
- Continuing legal and ICO engagement regarding consent for half-hourly consumption data and incorporating the outcomes into the Phase 1B design.
- Defining supplier obligations and operational processes under the integrated model, including account-holder verification.
- Integrating TI and CCS legal documentation, including schedules, access agreements, and accreditation provisions, ensuring a proportionate approach for different data access types.

A member raised technical considerations regarding the integration of TI into CCS, noting that CCS is based on FAPI 2.0 and that care would be needed to avoid introducing additional integration complexity or duplicate components. They also queried whether existing TI service level requirements, particularly around token response times, might need to be relaxed for TI suppliers and users. NG confirmed that these issues were already under active consideration and that work was underway with the CCS technical provider to minimise onboarding impact and operational burden for participants. They also confirmed that SLA implications were being assessed, recognising both constraints and opportunities.

A member questioned whether the proposed inclusion of TI represented a material expansion of CCS scope, highlighting differences between tariff consent (account holder) and consumption data consent (occupier), as well as differing data sensitivities. They expressed concern that CCS had been deliberately scoped for MMP delivery and that Phase 1B could increase complexity. SJ responded that CCS had been designed with future expansion in mind, using a roadmap approach. While Phase 1B represents an extension of scope, IDV and federated identity were already anticipated elements within CCS design. MPW added that Phase 1B is not hard-linked to CCS MMP delivery. CCS MMP timelines remain unchanged, and Phase 1B would be delivered as a planned enhancement to CCS, reducing overall industry effort by using a single consent solution rather than parallel mechanisms.

A member sought clarification on whether adding tariff data would require CCS platform development or could be handled largely through configuration. MPW and NG advised that, while impact assessment work is ongoing, the current expectation is that Phase 1B changes would fall predominantly within configuration rather than significant development.

A member queried whether CCS requirements would supersede Supplier-specific OAuth solutions already in place. MPW advised that this level of technical detail would need further analysis and agreed to take the question away for follow-up.

4. FORWARD PLAN

The Chair concluded the meeting by outlining upcoming sessions and encouraged ongoing feedback and engagement from all participants.

The Chair advised that all consultation responses will be published on the RECCo website on 28 April. The next Engagement Webinar will be following up on these consultation responses and is likely to be scheduled for late May. The next Topic Solution Group meeting on 07 May 2026 will focus on user experience.

MPW advised that any members with queries are welcome to email consumerconsent@retailenergycode.co.uk, and the RECCo project team will be happy to respond. MPW added that RECCO are looking for early adopters of the CCS solution and asked any interested parties to scan the QR code at the end of the meeting slides.

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ATTENDEE ORGANISATIONS

Attendee	Representing	Initials	Role
Michael Walsh	Retail Energy Code Company	MJW	Chair
Sarah Jones	Retail Energy Code Company	SJ	Presenter
Matt White	Retail Energy Code Company	MPW	Committee Member
Nathan Gould	Retail Energy Code Company	NG	Committee Member
Harry Firth	REC Code Manager	HF	Secretariat

Ofgem	Publicis Sapient
Department for Energy Security and Net Zero	Centrica
Citizens Advice	CGI
Which?	SECCo
Consumer Scotland	SMS Energy
ScottishPower	PayPoint
Elexon	GreenSync
Perse Energy	National Energy System Operator
SSE	N3rgy
E.ON	Flock Associates
East Lothian Housing Association	One Utility Bill
Smart DCC	ESG Global
Raidiam	PRIME
Electralink	ScottishPower
Cadent	Ohme
Stark	Smart Energy GB