RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

I0318 – INTRODUCTION OF CONSUMER CONSENT SOLUTION

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	TBD
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	AUTHORITY DETERMINED
PRIORITY STATUS	HIGH/CRITICAL	URGENCY	STANDARD
IMPACTED STAKEHOLDERS	ALL CONSUMERS, ALL PARTIES, THIRD PARTY INTERMEDIARIES, NEW SERVICE USERS & SERVICE PROVIDER(S), REC CODE MANAGER		

LEAD ANALYST (SOLUTION LEAD)
HARRIET TRUSS
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OVERVIEW

This REC Issue has been raised to promote visibility and awareness of opportunities for engagement in the development of the new Consumer Consent Solution arrangements. It will then progress to Change Proposal to implement the proposed arrangements.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Change Panel:

- **APPROVE** the Proposal Plan, including the Responsible Sub-Committee, Change Path, Priority Status, Urgency and timetable.

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BACKGROUND

1 SUMMARY

Ofgem has selected RECCo as the delivery body responsible for developing a Consumer Consent Solution (CCS) and confirmed that the solution will be governed under the REC - Consumer Consent decision | Ofgem, published 29 April 2025.

The purpose of the CCS is to provide a central, standardised and trusted mechanism for capturing, managing and validating Consumer consent for the sharing of energy data. Consumer consent is key to a more transparent, efficient, and Consumer-centric energy market. This initiative will support the transformation of how energy is managed and consumed, by giving Consumers control over their energy (gas, electricity, heat, or other) data, enabling innovation through third-party services, and advancing sustainability goals.

For the Minimum Marketable Product (MMP), the CCS is expected to focus on Domestic Half Hourly metered data and to support relevant Data Sharing Arrangements, including DCC Other Users data sharing and, subject to approval, the Smart Data Repository which is being developed by Elexon.

Delivery of the CCS is being managed through a bespoke RECCo project[1] covering the procurement of technical service providers; design, build and test of the CCS; and definition of the governance framework and associated REC drafting.

The project is working towards delivering a MMP in Q1 2027. The CCS provisions will be introduced into the REC via standard REC change governance.

This REC Issue has been raised to promote visibility of the proposed changes to the REC and of stakeholder engagement opportunities, in advance of the CCS Change Proposal being progressed.

2 PROBLEM STATEMENT

A new set of arrangements for a Consumer Consent Solution (CCS) is currently being developed under the RECCo CCS project. The new arrangements will need to be implemented within the REC so that they can be governed under the REC on an enduring basis.

[1] Consumer Consent Solution - The Retail Energy Code Company

3 IMPACTS

CONSUMERS
All Domestic

REC SERVICE PROVIDERS
New CCS Service Provider(s)
Enquiry Services

RECCO / REC CODE MANAGER
REC Professional Services
REC Technical Services
REC Performance Assurance
REC Qualification
RECCo Operations

REC PARTIES AND SERVICE USERS	REC DOCUMENTS / PRODUCTS	REC DATA SPECIFICATION
All REC Parties	Existing: • REC Main Body • Schedule 1 – Interpretations & Definitions • Schedule 9 – Qualification & Maintenance • Schedule 10 - Charging Methodology • Schedule 29 - Address Management • Performance Assurance documents (Category 2 and 3) • Access Agreement • Market Scenarios	Existing: • Market Message Catalogue – new CCS messages • Data Item catalogue
New - CCS Users	New: • CCS Arrangements Schedule • CCS Service Definition	New: • CCS API Technical Specification • Customer Experience Guidelines

MARKET-WIDE HALF HOURLY SETTLEMENT (MHHS)
No impacts are expected on the new MHHS arrangements as a result of the introduction of CCS. However, the CCS is intended to facilitate sharing of Half Hourly metered data being made available by Elexon as a result of the new MHHS arrangements.

No impacts are expected on MHHS Qualification or Migration as a result of the introduction of CCS.

The MMP is limited to domestic only. Later phases may incorporate non-domestic. Although Energy Suppliers are not required to participate as part of the MMP, the expectation from the Ofgem direction is that they will be part of the CCS arrangements at some point. Timing of this extension is to be determined.

RECCo and the Code Manager operational arrangements will need to be updated to manage a new service and the associated arrangements.

The expected impacts to the REC are set out above, however, these are subject to refinement as the project progresses and legal drafting is developed.

4 CROSS-CODE IMPACTS

There are potential cross-code impacts with the Smart Energy Code (SEC) and these are, at this stage, being managed through the RECCo CCS project.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**26 Feb-26**	**30 Sep-26**
	(Solution Development under RECCo CCS project, inc Legal Reviews & Impact Assessment)	February	September
Change Proposal		**30 Sep-26**	**08 Dec-26**
	Business Case Assessment	October	October
	Consultation	November	November
	Solution Refinement	November	December
	Final Determination	December	December
Voting		**08 Dec-26**	**15 Dec-26**
	Referral to Authority	16 December	16 December

6 STAKEHOLDER ENGAGEMENT

The primary channel for stakeholders to engage with the development of the CCS arrangements is through the RECCo project. This includes the CCS consultation activity, working groups and project-led engagement on design, governance and REC drafting.

In support of the project, and to ensure engagement across REC change stakeholders, the Code Manager will facilitate visibility of the project's progression via this REC Issue. This will

mainly focus on regular updates to the Change Issues Group and in particular will take opportunities to highlight key engagement opportunities.

The Code Manager will also provide updates to the Change Panel at appropriate key points in the development of the arrangements. When appropriate updates and/or papers will be taken to the REC Performance Assurance Board or other relevant REC Sub-Committees.

The legal drafting for the new CCS arrangements will be developed and consulted on under the RECCo CCS project. The project legal drafting consultation is expected to take place in Q3 2026 and will be the main opportunity for stakeholders to influence the REC drafting. The drafting will then be taken forward by the Code Manager through REC change governance. The industry consultation under the Change Proposal will be focussed on confirmation that the arrangements, including the drafting, have been developed through a robust and open process – only minor refinements/corrections are expected during this stage.

If additional 'informal' stakeholder engagement is required ahead of an impact assessment being published, the Code Manager will provide details through this REC Issue.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	2	25	50
	Retail Markets Impact	Innovation and Market Arrangements	0	15	0
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	5	5
		Legal and Regulatory Compliance	2	13	25
Resource	Complexity / Effort / Duration		1	8	8
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		3	15	23
	Contribution to/ Alignment with RECCo's Forward Work Plan		3		23
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity (High Priority activity)	2	20	40
				Overall Priority Score (rounded)	173

Priority Status	CRITICAL
Change Proposal Type	STANDARD

The priority has been determined to be 'Critical' based on the Ofgem-directed nature of the CCS, the delivery timeline (target MMP go-live of Q1 2027), and the fact that the REC changes are on the critical path for enabling implementation of the CCS.

The CCS will introduce a new REC Service, alongside significant new governance, technical specifications, and changes to existing REC arrangements. These changes are fundamental to enabling consent-based access to Half Hourly metered data and are a prerequisite for CCS operation.

Failure to progress this REC Issue in line with the CCS project timeline would create a material risk to delivery, as:

- the REC provides the enduring governance framework required for CCS to operate;
- the legal drafting, consultation and approval processes are complex and time-bound; and
- delays in REC change governance would directly impact the ability to implement the CCS arrangements and go-live of the CCS itself.

In addition, the CCS is expected to support wider market developments and dependencies, meaning that delays would have broader impacts beyond the REC itself.

On this basis, this REC Issue is considered critical to the successful and timely delivery of the CCS and should be progressed as a priority within REC change governance.

8 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

8.1 RISKS AND ISSUES

No risks or issues have been identified at this time.

8.2 ASSUMPTIONS AND DEPENDENCIES

No assumptions have been identified at this time.

NO.	DEPENDENCY	NOTES	STATUS
I0318-D001	The I0318 Proposal Plan depends on solution design and legal drafting being delivered and baselined following consultation within the RECCo CCS project, prior to progression to Change Proposal	The Code Manager is directly involved in the project to enable continuity across the project and REC change governance activities	Open – dependency being managed within the RECCo project

9 APPENDIX

CHANGE PROPOSAL	Link
RELATED LINKS	Consumer Consent decision | Ofgem Consumer Consent Solution - The Retail Energy Code Company REC Portal - Consumer Consent Hub P494 Establishing a Smart Data Repository (SDR) - Elexon BSC RECCo | Consumer Consent Solution Glossary

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10 GLOSSARY

TERM	DEFINITION
Consumer Consent Solution (CCS)	The solution that will allow the Consumer Consent Trust Framework rules and standards to be implemented and for data sharing to take place between parties when consent is granted by a consumer. [CCS Glossary definition]
Consumer Experience Guidelines (CEGs)	The minimum standards and expectations for how consumer interactions should be designed and delivered, to ensure clarity, accessibility, consistency, and trust across services and channels. [CCS Glossary definition]
Data Sharing Arrangement (DSA)	An agreement between two or more parties that outlines the terms, conditions, and procedures for the exchange of data, including the type of data to be shared and the purposes for which the data will be used. [CCS Glossary definition]
DCC Other User (Other SEC Party type)	means, for a Smart Metering System or a Device and any period of or point in time, a User that is not acting in the User Role of Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor, Gas Transporter, Registered Supplier Agent or Meter Data Retriever (regardless of whether in fact that User is a Responsible Supplier or the Electricity Distributor or the Gas Transporter or the Registered Supplier Agent or the Meter Data Retriever during that period of or at that point in time) [Smart Energy Code definition for Other User]
Half Hourly	refers to electricity being traded and/or settled on a Half Hourly basis.
Smart Data Repository (SDR)	A data repository being developed by Elexon under the Balancing and Settlement Code (BSC) that will enable efficient and non-discriminatory access by third parties to half-hourly consumption data.