RETAIL ENERGY CODE

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TARIFF INTEROPERABILITY ARRANGEMENTS - OVERVIEW AND ASSURANCE APPROACH

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SUMMARY

FOR INFO	This paper sets out the background to the Tariff Interoperability (TI) Arrangements that will facilitate provision of Tariff Pricing Data to TI Users and Customer Specific Tariff Information to Registered Tariff Interoperability (RTI) Users. These proposals will be facilitated by changes to the REC and a new Electricity SLC, introduced by DESNZ. Legal drafting and an implementation approach were published for consultation in November 2025 with responses due on 20 January 2026. TI policy is being led by DESNZ, in partnership with RECCo. The TI Arrangements consultation proposes requirements for RTI Users to sign a User Agreement (binding them to REC obligations) and obtain consumer consent before accessing Customer Specific Tariff Information from a Supplier as well as rights for PAB and RECCo to suspend and remove RTI User access. It also set out proposals for a Monitoring Tool to send Tariff Pricing Data requests to Suppliers to mimic a TI User and monitor Supplier performance, as well as requirements for Suppliers to provide a [daily] performance report to Code Manager (which will require an update to the PARC). RECCo welcomes initial views on the proposed performance assurance approach from PAB. We will set out detailed proposals to update the PARC with Supplier monitoring requirements and seek views from PAB at its February 2026 meeting, ahead of consulting on a change to the PARC to incorporate these requirements and then seeking PAB's approval. We want to ensure that PARC reporting is agreed in mid-2026, well in advance of go-live (early 2027) to allow Suppliers and Code Manager to build and test the reporting requirements. RECCo requests the PAB to: • **NOTE** the contents of this paper and provide comments on any concerns identified, ahead of detailed PARC proposals being provided to PAB at its February 2026 meeting.

Policy Overview

Tariff pricing data is required to optimise Energy Smart Appliances (ESAs) however this data isn't available in a consistent format from a single source. Currently consumers are required to manually configure their ESAs or ESA manufacturers must build custom integrations with data sources.

The Energy Act 2023 provided the Secretary of State powers to introduce changes for the purpose of Tariff Interoperability. Energy Act powers will be used to introduce a requirement that suppliers make tariff data available via an Application Programme Interface (API) in a consistent format. In addition, RECCo will progress consequential changes to the PARC using the standard REC Change Process.

Optimisers and ESA devices will then be able to access the API and use the tariff pricing data to optimise ESAs. The result of this being that consumers will save money by more easily optimising their energy consumption.

Tariff Interoperability will be delivered in two phases. The first phase will require suppliers to make electricity data available for time of use tariffs. In phase two we intend to expand the requirements on suppliers so they must also make gas and complex tariff data (e.g. block tariffs) available. The November 2025 consultation focussed on delivery and implementation of phase one.

What are we delivering?

RECCo is the delivery body responsible for delivering the TI Arrangements MVP for four separate Use Cases

Use Case A	Use Case B	Use Case C	Use Case D
Support a third-party organisation in optimising energy consumption when a customer of the organisation **knows their current supplier and tariff name (or can easily find them) and provides this information to the organisation.**	Support a third-party organisation in optimising energy consumption if a customer **does not know their tariff name (and cannot easily find it) but knows their supplier's name and is the bill payer**.	Support a third-party organisation in optimising energy consumption of a customer **when the supplier modifies the unit prices and/or time components of Time of Use tariffs.**	Support a third-party organisation in optimising energy consumption of a customer, **without requiring the customer of the organisation to manually inform the organisation if they change their tariff or supplier.**

Suppliers will be obliged to make their Tariff Pricing Data available to TI Users (Optimisers, Load Controllers and others) in a repeatable, uniform way through a standardised data format.

There are protections available to Suppliers through User Registration, binding certain types of Users (RTI Users) to the REC, and requiring Consumer Consent (see Appendix A).

Who’s involved and what’s the impact?

Suppliers

- Suppliers will be required to build their API according to the TI API Technical Specification
- The new TI Arrangements REC Schedule will outline the governance and performance obligations that Suppliers will need to comply with

TI Users

- 'Users' refers to third-party organisations or individuals who wish to use the TI Arrangements to access tariff pricing data
- TI Users are any user who wishes to access tariff data from Suppliers which is publicly available
- As this information is not consumer specific then TI Users are not required to register

Registered TI Users (RTI Users)

- RTI Users are users who wish to access Consumer Specific Tariff Information e.g. notification of a change of tariff or switch
- To access this type of data, RTI Users must first register with the TI Arrangements - including signing a User Agreement to bind them to certain REC clauses
- RTI Users must obtain consent from the consumer to access this information (see Appendix A)

Who's in scope?

All Domestic Suppliers	Non-domestic Suppliers above MPxN threshold
Electricity Consumers	**Electricity Consumers on non-bespoke contracts**

What's not in scope?

Suppliers must provide data in relation to Domestic and Relevant Non-Domestic Premises, with the following exclusions:

1. Does not apply to non-domestic only suppliers that supply fewer than 100,000 electricity Relevant Non-Domestic Premises
2. Where the Relevant Non-Domestic Premises has bespoke changes
3. Where a non-domestic only supplier is only required to provide Deemed Contract Tariffs
4. If the Supplier's charges are not compatible with the TI API Technical Specification
5. Gas Tariffs
6. However, Suppliers who are excluded for any of the above reasons can choose to make the data available on a voluntary, opt-in basis
7. All of this will be detailed in the Supplier Licence Conditions

Delivery timeline

November 2025 – January 2026

DESNZ-led consultation on the REC changes and SLC changes takes place.

Q2 2026

Changes introduced into the REC by DESNZ following analysis of responses, any required changes, and further DESNZ and Ofgem review.

Q1 2027

Supplier APIs (including monitoring reporting) developed and deployed. User Register, Supplier Register and Monitoring Tool move into Go-Live.

Important to note that this is not a standard REC Change.

DESNZ will introduce changes to the REC using Energy Act 2023 powers. Some consequential changes – including the PARC will be made through the standard REC change process

TI Arrangements – Technical Components

Tariff Interoperability is made up of several components which can be separated into broad categories of technical and governance

Technical Components

API Technical Specification

Technical definition of Tariff Interoperability API (including supplier reporting) to enable Suppliers and RTI Users to build their solution.

Data Specification

Standardised definition of New Data Items (where required) and New Market Messages for sharing data – includes supplier reporting

RECCo Tariff Interoperability Arrangements Enablers

Supplier Register

Register of Supplier information and Supplier Endpoints to allow for accurate flow of information from Users via API

User Register

Stores Registered User information and allows the registration of Webhooks for event notifications

TI Monitoring

Internal tool used by RECCo to monitor and assure the performance of Suppliers and Users' adherence to agreement

TI Arrangements – Governance Components

Tariff Interoperability is made up of several components which can be separated into broad categories of technical and governance

Governance Components

REC Schedule +

Including new TI Arrangements Schedule, setting out obligations on Suppliers, Users and RECCo

User Agreement

Agreement to be signed by RTI Users requiring them to meet standards on data protection, use of data, security, etc.

Supplier Licence Conditions

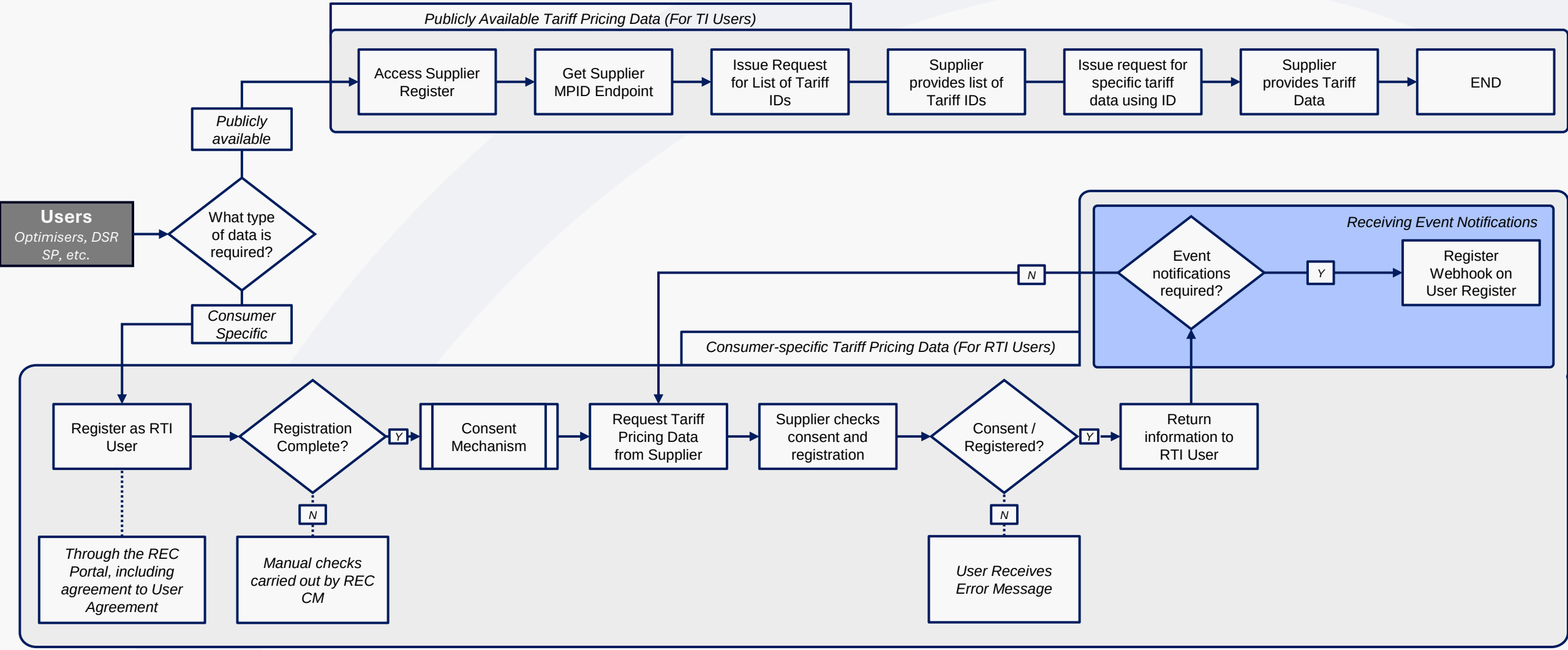
Additions to the Supplier Licence Conditions to enact rules for Tariff Interoperability

The User Agreement

What is the User Agreement and why does it need to be robust

- The User Agreement provides the legal pathway to allow RTI Users to access Consumer Specific Tariff Information. If a RTI User wants to access Consumer Specific Tariff Information, it must comply with the TI Arrangements Schedule.
- Consumers require confidence that a robust legal framework exists which protects the use of their data. All TI participants require confidence that their obligations can be discharged, their intellectual property protected, and their confidential data protected. Each TI participant needs assurance that there are consequences of non-compliance and that the consequences provide an adequate deterrent.
- **The User Agreement:**
    - **Provides rights for RECCo and PAB to suspend and revoke RTI User access to Consumer Specific Tariff Information,**
    - **Provides rights for PAB to impose sanctions in accordance with the Performance Assurance Schedule, and**
    - **Requires an RTI User to comply with PAB directions.**
- The User Agreement removes the need for RTI Users to hold multiple bilateral agreements with Suppliers.
- The proposed REC Schedule contains a section which outlines the permitted use of the TI Arrangements. This restricts permitted use of ‘for the purposes of providing services to a Consumer from which the organisation has consent”

Accessing public and consumer-specific tariff data



Performance Assurance – Suppliers

Direct Testing

REC Code Manager Monitoring Tool will send daily API messages to each Suppliers' public TI API, using the endpoints in the TI Register

This will ensure that the API is operational and performance to the SLAs set out in the TI REC TII Schedule

Logging and Metrics Data

We also propose that Suppliers are required to send a daily API message to the REC Code Manager with performance assurance information.

A draft of this payload is included into the API Technical Specification for consultation.

Logging and Metrics Data will be reflected in an update to the Supplier reporting requirements in the PARC. This will be progressed as a REC Change Proposal in early 2026 and will come to PAB for approval later this year.

PAB's Role

As there will be new REC obligations, PAB will be responsible for decisions on the nature and extent of the assurance activities. This should be based on risks to consumers or participants if organisations don't meet their new obligations.

The PAB will then make decisions through the operation of this assurance, e.g. if more serious PATs should be applied.

Our initial assessment is that there are potential risks around misuse of consumer personal data, non-compliance leading to a consumer's energy supply not being optimised (and higher energy bills), and non-compliance leading to lower take-up/sub-optimal operation of ESAs reducing overall contribution to Net Zero

Performance Assurance – TI Users and RTI Users

1

We do not propose to require TI Users and RTI Users to provide reporting data.

2

Code Manager can investigate RTI User compliance with its obligations set out in the User Agreement. PAB can suspend or remove access to Consumer Specific Tariff Information and apply sanctions in accordance with the Performance Assurance Schedule where appropriate. RECCo will also have certain rights to suspend and remove access.

What’s next?

1. We welcome any initial views from PAB and will take these into account, alongside consultation responses (due 20 January 2026).

2. We will provide a paper to the February 2026 PAB meeting setting out proposals to update the PARC Energy Supplier reporting requirements as well as information on how this data is expected to be used.

3. We then propose to consult on changes to the PARC, with the aim of returning to PAB in May 2026 to seek approval. This would be after the TI Arrangements Schedule has been implemented and will provide Suppliers and Code Manager with the information needed to build and test the reporting arrangements ahead of go-live in early 2027.

Appendix A: The consent mechanism

The consent mechanism exists between the Consumer, RTI User and the Supplier. It is defined within the Code Drafting across the multiple documents. RECCo does not have a role in generating, managing, or storing information relating to digital certificates or tokens.

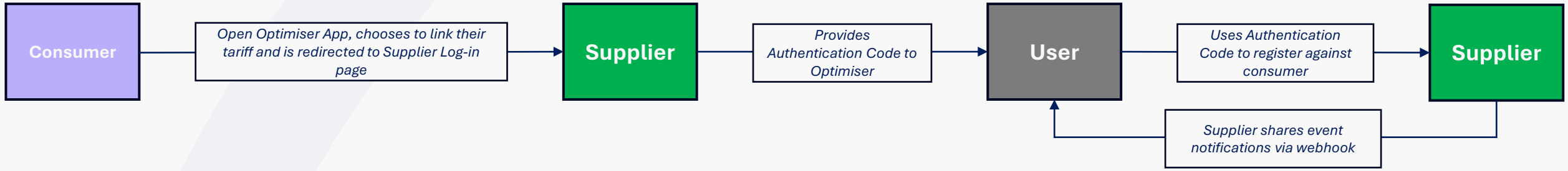
To receive consumer-specific tariff information from Suppliers, Users must demonstrate that they have the Consumer's consent to receive this data. This is done through the OAuth2.0 protocol.

To provide their consent, Consumers initiates the process with the User app or website. They will then be redirected to the Supplier log-in page.

They provide their details and are prompted to provide their consent. There are two types of consent which can be provided: a one-off consent and a longer-term consent.

One-off consent: Only used in the scenario where the consumer knows their Supplier but not their Tariff, and as such, must provide consent to the User to receive their Tariff from the Supplier. This consent is intended to allow one-off access for the User.

Longer-term consent: For the purposes of allowing Users to receive regular event notifications via Webhook (allowing for messages regarding change in unit price, change in tariff, or change in Supplier to be exchanged). This consent does not expire and will remain until it is specifically revoked by the consumer.



- Suppliers will be required to hold and maintain information on the relationships between consumers and Users for the purposes of enduring consent
- The consumer must be able to revoke consent, through a request to either the Supplier or the User