RETAIL ENERGY CODE

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TARIFF INTEROPERABILITY PHASE 1A: PERFORMANCE ASSURANCE

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FOR INFORMATION	In January 2026, RECCo provided and overview to REC Performance Assurance Board (PAB) on Tariff Interoperability (TI) and associated performance assurance proposals (RECPAB_26_0127_03). Section 1 of this paper provides an update on the TI arrangements following industry consultation and sets out the key energy retail risks from TI to be mitigated through assurance. Section 2 sets out proposed changes to the Performance Assurance Report Catalogue (PARC) and the Maintenance of Qualification Annual Compliance Statement that would require suppliers to provide Performance Assurance information and requests REC PAB to note the plan to issue this for Party Impact Assessment and Service Provider Impact Assessment. Section 3 provides an update on the TI Phase 1a implementation approach. RECCo recommends REC PAB to: • **NOTE** the publication of the TI updates to the PARC and the Maintenance of Qualification Annual Compliance Statement for Party Impact Assessment and Service Provider Impact Assessment. • **NOTE** the proposed implementation approach for TI Phase 1a.
APPENDICES	**RECPAB_26_0602_04A – TI PARC updates** *(see accompanying document)* **RECPAB_26_0602_04B – TI Annual Statement updates** **RECPAB_26_0602_04C – Change Report: I0323 – Tariff Interoperability Phase 1a – Supplier Performance Assurance Requirements** *(see link here - not provided separately)*

1 BACKGROUND

The Department for Energy Security and Net Zero (DESNZ), in partnership with RECCo, developed and consulted on Tariff Interoperability proposals.[1] DESNZ has now published a Government Response to the consultation and its decision to implement new Tariff Interoperability arrangements through a new Electricity Supply Standard Licence Condition (SLC) 11C, changes to REC Schedule 1: Definitions and Interpretations and new Schedule 35: Tariff Interoperability Arrangements.[2,3] These changes were implemented on 18 May 2026 and set a TI Phase 1a go-live date of 18 February 2027.

The Government Response also baselined a new TI Application Programming Interface (API) Technical Specification and changes to the Energy Market Data Specification (EMDS). Following testing to further assure the detailed design, these will be subject to further consultation and implemented into the REC later in 2026.

The Government Response has split the delivery of Phase 1 into two phases. Phase 1a, which will go live in February 2027, provides TI Users with access to publicly available tariff information from TI Energy Suppliers.[4] Phase 1b, which will go live in November 2027, provides Registered Tariff Interoperability (RTI) Users with access to Customer Specific Tariff Information[5] from TI Energy Suppliers. Phase 1b will use the Consumer Consent Solution (CCS), currently being developed by RECCo, to facilitate the required consumer consent for RTI Users to access Customer Specific Tariff Information.[6]

This paper covers the assurance approach for TI Phase 1a only. A further update will be provided on the Performance Assurance considerations for TI Phase 1b.

The TI risks are not yet referenced in the Retail Risk Register or the Performance Assurance Operating Plan (PAOP) but will be included in the updated versions currently being developed by RECCo. In summary:

- If Energy Suppliers do not meet their Tariff Interoperability obligations e.g. tariff data is not updated or the API is not available when required, this could lead to Consumers' Energy supply not being optimised, meaning that they incur higher charges,
- If price signals are not responded to through optimisation, this may reduce Net Zero benefits and reduce response to other Energy price signals, and
- If poor Energy Supplier performance reduces trust in the Tariff Interoperability arrangements, this may dissuade Consumers from engaging in future optimisation and overall response to Energy price signals.

2 TI PHASE 1A - ENERGY SUPPLIER PERFORMANCE ASSURANCE

[1] Tariff Interoperability Consultation November 2025
[2] These changes were made by DESNZ using its Energy Act 2023 powers.
[3] Government's consultation response was published 13 May 2026 on RECCo's Website and the decision notice was published 18 May 2026 on GOV.UK
[4] TI Energy Suppliers are Electricity Suppliers that are mandated to provide data as set out in new Electricity Supply SLC11C as well as any electricity or gas supplier that has opted into the TI Arrangements. TI Users are not regulated under the REC and can be any organisation or person.
[5] Customer Specific Tariff Information will include a customer's specific tariff as well as notification of changes to the tariff details, a switch and removal of the customer's consent to access data. Because of the personal nature of the data, RTI Users must enter into a User Agreement with RECCo to bind them to obligations set out in the REC.
[6] Phase 2 of the Tariff Interoperability project will extend the requirement to provide tariff data to more complex tariffs and to the gas market.

2.1 ASSURANCE PROPOSALS

The November 2025 consultation said that RECCo would raise a REC Change to implement the required changes to the PARC to assure the performance of TI Energy Suppliers (i.e. Electricity Suppliers mandated by SLC11C and those that have opted in) in live operation. RECCo has now raised I0232: Tariff Interoperability Phase 1a - Supplier Performance Assurance Requirements.

RECCo has updated its consultation proposal and will not require TI Energy Suppliers to send a daily API message with performance data. This is considered to be disproportionate at this point in time.

Having further considered the new TI requirements, RECCo considers that it would be proportionate to assure some of these (set out below) through the Maintenance of Qualification Annual Statement rather than through additional performance reporting set out in the PARC.

RECCo's Performance Assurance proposals are summarised below with further detail set out in Appendix 04A (PARC Updates) and Appendix 04B (Annual Statement updates):

- **PARC TI Energy Supplier Performance Report (monthly)**: TI Energy Suppliers will be required to report against the new REC obligations on: TI API availability (99.9%), TI API response times of 95% less than 1 second against steady state (1,000 requests/second) and 95% less than 5 seconds between steady state and peak capacity (up to 5,000 requests/second for 5 minutes), making all tariff updates available at least 60 minutes before they take effect and removing TI User access (e.g. on grounds of excessive use or security) as well as volumetrics on use of the service.
- **PARC API Error Codes Report (on request)**: TI Energy Suppliers will provide up to 3 months data on the number and type of API Error Codes. API Error Codes identify messages that have not been successfully received by TI Energy Suppliers or by TI Users. Data will be provided following a Code Manager request, for example to support a deep dive on the effectiveness of the TI arrangements. TI Energy Suppliers will have at least 1 month to provide data following a request.
- **PARC Tariff Structure Report (on request)**: All Electricity Suppliers[7] (not just TI Energy Suppliers) will provide information on the structure of any of their tariffs that cannot be sent to TI Users using the schema set out in the TI API Technical Specifications. This will provide valuable information on any required changes for TI Phase 2, which will extend the reach of the TI arrangements to complex electricity tariffs as well as to the gas market. This information will also inform any future reviews of the TI arrangements.
- **Maintenance of Qualification Annual Statement**: TI Energy Suppliers will be required to confirm that they have made all tariffs within scope of the TI arrangements available to TI Users and have in place arrangements to manage queries from TI Users and Consumers. This information will be collected as part of the Maintenance of Qualification Annual Statement and will be documented in the REC Maintenance of Qualification Guidance (note that this guidance is not subject to REC change management but has been included within scope of I0323 to obtain industry views and for transparency).
- **TI Monitoring Tool**: In addition to direct reporting from Energy Suppliers on their TI performance, RECCo is developing a TI Monitoring Tool. This will enable RECCo to understand in real time if a TI Energy Supplier's API is available, the response time for calls and to confirm that the API messages sent are consistent with the TI API Technical Specification. The TI Monitoring Tool will poll each TI Energy Supplier's MPID every few minutes (randomised so that checks are not predictable). While this will provide a good level of assurance that the TI

[7] This requirement mirrors a new obligation in Electricity Supply SLC11C and will be collected under the REC for efficiency purposes.

arrangements are being operated to the required standards, it is not a substitute for the assurance that can be obtained from supplier self-reporting. For transparency, TI Monitoring Tool Performance Assurance reporting has been added to the PARC.

TI Users can be any organisation or person that wishes to access tariff data from a TI Energy Supplier. This data within scope of TI Phase 1a is publicly available and does not contain personal data. Given the data involved and the intent for this to be an open data access model, under which TI Users are not 'authorised', we do not propose to assure TI User performance. To mitigate risk, Suppliers will be able to restrict access to a TI User where defined capacity limits are breached (1,000 requests per second from an individual IP address), or on grounds of security.

Subject to any comments received from REC PAB at their 02 June 2026 meeting, I0323 will be issued for Party impact assessment and Service Provider impact assessment. At their meeting on 19 May 2026, the REC Change Panel approved the plan set out in Table 1. This timetable would mean that the changes to the PARC would require PAB to cast their vote in September 2026. This timetable aims to provide TI Energy Suppliers with sufficient notice to design, build and test these new reporting requirements ahead of TI go-live in February 2027, with the first report being submitted on 01 April 2027.

Milestone	Activity	From	To
Definition		**21 Apr-26**	**13 Aug-26**
	Solution Development	April	May
	Legal Review	May	June
	Service Provider Impact Assessment[8]	June	July
	Party Impact Assessment	June	July
	Business Case Assessment	July	August
Change Proposal		**13 Aug-26**	**29 Sept-26**
	Consultation	August	September
	Solution Refinement	September	September
	Final Determination	September	September
Voting		**29 Sept-26**	**29 Sept-26**
	Appeal Window	29 September	13 October

Table 1: I0323 change plan

2.2 PAB ACTION

REC PAB ACTION

RECCo recommends REC PAB to:

- **NOTE** the publication of the Tariff Interoperability updates to the Performance Assurance Report Catalogue for Party Impact Assessment and Service Provider Impact Assessment.

[8] We will seek Service Provider Impact Assessments from Party Assurance (Moorhouse), Data Analytics and Digital Services (Cap Gemini) and Qualification (Deloitte).

- **NOTE** the publication of the Tariff Interoperability updates to the Maintenance of Qualification Annual Compliance Statement for Party Impact Assessment and Service Provider Impact Assessment.

3 TI PHASE 1A IMPLEMENTATION

3.1 APPROACH

The TI Phase 1a implementation approach has been developed in the context of the risks to Consumers and realisation of optimisation benefits as noted in Section 2 of this paper. It has taken into account responses to the November 2025 consultation and has been further refined with input from the TI Implementation Working Group (IWG).

RECCo has developed the following implementation approach for TI Phase 1a.

- **Pilot Group Testing** (*May 2026 to July 2026*): Volunteer Energy Supplier(s) and TI User(s) will execute end-to-end testing of defined test cases developed by RECCo and validated through IWG consultation. This activity will be coordinated by a RECCo TI Implementation Manager. Pilot Group Testing will validate the detailed TI design ahead of the TI API Technical Specification being consulted upon in July 2026 and Implemented into the REC in October 2026. Pilot Group Testing will assure RECCo's build of the TI Supplier Register, the TI Monitoring Tool and the simulators that will support Energy Supplier and TI User Self-Assessment later in the year.
- **Supplier and TI User Self-Assessment** (*October 2026 to January 2027*): Suppliers will be required to complete a minimum set of test cases (validated during Pilot Group Testing) ahead of TI Go-Live. We believe that self-assessment provides an acceptable level of assurance based on the low level of risk involved in the sharing of public tariff data and the inclusion of an attestation and pre-TI-Go-Live check (see bullets 4 and 5 below). TI Users will have an opportunity to use simulators to test their interactions with the TI Supplier Register and Energy Suppliers so that they are ready for TI Go-Live.
- **Supplier Engagement** (*June 2026 to February 2027*): In Q2 2026, the Code Manager will request confirmation from Suppliers that they are aware of their obligations to provide tariff data from February 2027 and, either have a plan in place, or will develop a plan to meet this requirement. This will also be an opportunity for suppliers to confirm if they are mandated (as per SLC11C) to provide tariff data and to identify any non-mandated suppliers who wish to opt into the TI arrangements. Code Manager will engage with Energy Suppliers throughout the year where prudent to support awareness and identify delivery risk. Any delivery risk identified will be managed by the TI Implementation Manager. RECCo will engage with Energy Suppliers (and TI Users) through the TI Working Group (TIWG), the IWG, webinars and existing comms channels.
- **Supplier Attestation** (*December 2026 to January 2027*): Suppliers will be required to provide an attestation, signed at Director level, to confirm that they have completed testing to the required standards, provided all relevant information to the Code Manager e.g. Supplier API Endpoints and contact details for issue resolution, and will be ready for TI Go-Live.
- **Pre-TI Go-Live Check** (*January 2027 to February 2027*): RECCo will use the TI Monitoring Tool to send an API message to each Supplier API Endpoint ahead of these being added to the production TI Supplier Register. This will ensure that each required Supplier API Endpoint is operational at the point that it becomes available to TI Users.

3.2 PAB ACTION

REC PAB ACTION



RECCo recommends REC PAB to:

- **NOTE** the TI Phase 1a implementation assurance approach.

4 APPENDICES

4.1 RECPAB_26_0602_04A – TI PARC UPDATES

See accompanying document.

4.2 RECPAB_26_0602_04B – TI ANNUAL COMPLIANCE STATEMENT UPDATES

This appendix sets out the proposed additional requirements to be added to REC Maintenance of Qualification Guidance Appendix 1 – Annual Statement:

> '*I confirm, to the best of my knowledge based on reasonable enquiry, as an organisation qualified under the REC, that:*
>
> *TI Energy Suppliers only:*
>
> - *We have made all tariffs within scope of the Tariff Interoperability Arrangements available to Tariff Interoperability Users, and have in place arrangements to continue to do so, and*
> - *We have made available, and continue to provide, processes for managing queries from Tariff Interoperability Users and consumers in relation to our operation of the Tariff Interoperability Arrangements.'*