RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	**Consultation**
04	Final Recommendation

CHANGE REPORT

R0323 - TARIFF INTEROPERABILITY PHASE 1A – SUPPLIER PERFORMANCE ASSURANCE REQUIREMENTS

DOCUMENT VERSION	V0.1
PROPOSED IMPLEMENTATION DATE	18 February 2027
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Performance Assurance Board	**CHANGE PATH**	Self-Governance
PRIORITISATION CATEGORY	High	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers, TI Users		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	ASSURANCE LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

This Change Proposal seeks to propose the addition of proportionate and targeted Tariff Interoperability reporting obligations on Suppliers.

CODE MANAGER MINDED-TO POSITION

The Code Manager Minded-to Position is to recommend that the Performance Assurance Board:

- **NOTE** the proposed change solution;
- **NOTE** the proposed implementation approach; and
- **NOTE** the proposed implementation date of 18 February 2027.

RETAIL ENERGY CODE

CONTENTS

1 Summary 3
2 Problem Statement 3
3 Impacts 4
4 Cross-Code Impacts 4
5 Proposal Plan 4
6 Prioritisation Category and Urgency 5
7 Proposed Solution 5
8 Draft Legal Text 7
9 Summary of Impact Assessment Activity 7
10 Risks, Assumptions, Issues and Dependencies 10
11 Business Case Assessment 11
12 Case for Change 12
13 Appendix 13
14 Glossary 13

RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

The Department for Energy Security and Net Zero (DESNZ), in partnership with RECCo, developed and consulted on Tariff Interoperability proposals. DESNZ has 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 (TI) Arrangements. 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. Phase 1b, which will go live in November 2027, provides Registered Tariff Interoperability (RTI) Users with access to Customer Specific Tariff Information 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.

The November 2025 consultation indicated that RECCo would raise a REC proposal (R0323) to implement the required changes to the Performance Assurance Report Catalogue (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 updated its consultation proposal and will not require TI Energy Suppliers to send a daily API message with performance data. Following consideration of responses to the consultation, RECCo are of the view that the consulted-on approach is disproportionate at this point in time. The decision to move away from the daily API and to a monthly report is reflected in Schedule 35 Tariff Interoperability Arrangements paragraph 2.17 (b). The reasons for this decision are set out in paragraph 77 of the Government Response.

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

2 PROBLEM STATEMENT

This proposal will provide the Code Manager with data to assure Supplier performance against obligations in a new REC Schedule: Tariff Interoperability Arrangements.

If Suppliers do not meet their Tariff Interoperability obligations, this could lead to Consumers' Energy supply not being optimised, meaning that Consumers may incur higher charges. If price signals are not responded to through optimisation, this may also have other impacts such as reduced Net Zero benefits and reduced response to capacity constraints.

3 IMPACTS

CONSUMERS
All Consumers

REC SERVICE PROVIDERS
REC Performance Assurance

RECCO / REC CODE MANAGER
REC Performance Assurance

REC PARTIES AND SERVICE USERS
Energy Suppliers
TI Users

REC DOCUMENTS / PRODUCTS
Performance Assurance Report Catalogue (PARC)

MHHS
No impact identified.

If poor Supplier performance reduces trust in the TI Arrangements, this may dissuade Consumers from engaging in optimisation and overall response to Energy price signals. It is anticipated that the TI Arrangements will support Consumers in optimising their Energy consumption and responding to price signals that reflect Net Zero impacts.

4 CROSS-CODE IMPACTS

No cross-code impacts have been identified at this stage.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**21 Apr-26**	**13 Aug-26**
	Solution Development	April	May
	Legal Review	May	June
	Service Provider Impact Assessment	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

To allow Suppliers to build and test the solution, the Code Manager is intending to seek approval from the Performance Assurance Board as soon as practically possible, followed by an implementation on 18 February 2027, to align with Tarriff Interoperability Phase 1a implementation.

6 PRIORITISATION CATEGORY AND URGENCY

6.1 CODE MANAGER REVIEW

The Code Manager is proposing this Change Proposal be given an Urgency Status of Standard and a Prioritisation Category of High.

The Code Manager believes this Change Proposal:

- Does not meet the Ofgem criteria for Urgency;
- Has a strong alignment to the Strategic Direction Statement as it supports an SDS priority and is clearly more strategically relevant than most other Standard changes;
- Has high importance as it delivers noticeably greater consumer, market or regulatory benefit than most other Standard changes; and
- Has a medium complexity as it requires co-ordination or effort but can be scheduled flexibly alongside other Standard changes.

SOLUTION

7 PROPOSED SOLUTION

The proposed solution introduces a new Performance Assurance reporting framework to support monitoring of compliance with the TI Arrangements. This consists of a new monthly report, 'Tariff Interoperability Energy Supplier Performance Assurance' (2100), alongside two ad-hoc reports: 'Tariff Interoperability Energy Supplier API Error Code Report' (2110) and 'Tariffs not in Scope of Tariff Interoperability Arrangements' (2120). Together, these reports will provide the Code Manager with visibility of Supplier performance, API issues, and tariff types that are not currently supported by the TI Arrangements, enabling effective monitoring and informing future development of the framework.

Alongside Supplier reporting, RECCo is developing a TI Monitoring Tool which will independently monitor API availability, response times and adherence to the TI API Technical Specification through regular polling of Supplier APIs. Together, the Supplier reporting mechanisms, annual self-certification, and independent monitoring tool are intended to provide a proportionate and robust assurance framework that supports effective oversight of supplier compliance and informs future development of the TI Arrangements.

7.1 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;
- removing TI User access (e.g. on grounds of excessive use or security); and
- volumetrics on use of the service.

The submission of this report is to be done through the REC Portal by the TI Energy Suppliers.

7.2 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 one month to provide data following a request.

The submission of this report is to be done through the REC Portal by the TI Energy Suppliers on an ad-hoc basis.

7.3 TARIFF STRUCTURE REPORT (ON REQUEST)

All Electricity Suppliers (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.

The submission of this report is to be done through the REC Portal by the TI Energy Suppliers on an ad-hoc basis.

7.4 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 R0323 to obtain industry views and for transparency).

7.5 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 Market Participant Identifier (MPID) every few minutes (randomised so that checks are not predictable). While this will provide a good level of assurance that the TI 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', R0323 does 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.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0323 can be found here.

PRELIMINARY ASSESSMENT

9 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

9.1 SERVICE PROVIDER IMPACT ASSESSMENTS

DIGITAL SERVICE PORTAL	• Changes to the DSP Portal will be required to facilitate the submission and validation of the new Party reports (i.e. the 2100, 2110 and 2120 files).
	• The following activities are required to design, build and test associated with this proposal:
	  ○ Business analysis and user story creation;
	  ○ Development of SFTP ingestion mechanism;
	  ○ Additional file upload and validation on upload screen;
	  ○ Display of new dashboard; and
	  ○ Testing of SFTP, file upload and dashboard display.
	• Anticipated lead time is 3 months. This includes mobilisation lead time following the Change Proposal being approved.

DATA ANALYTICS	• A suggestion to move away from Microsoft Excel for ad-hoc report 'Tariffs not in scope of Tariff Interoperability Arrangements' was received. The Code Manager clarified that

	given the more descriptive nature of the request under this report, this may be better to be collated via Excel.
	• Changes to systems/processes are required as the new data sets being added to the PARC will need to be collected, processed and displayed within the Performance Assurance dashboards.
	• The following activities are required to design, build and test associated with this proposal:
	  ○ Capture requirements, review data source, mappings and agree success criteria;
	  ○ Dashboard content design, including data source and aggregation rules;
	  ○ Establish file format and transfer Mechanism for TI Monitoring Tool outputs;
	  ○ Build of data ingestion, pipeline and dashboard; and
	  ○ Testing data ingestion, pipeline and dashboard.
	• The following ongoing activities are expected to take place following the implementation:
	  ○ Each month: ingest data sets, run processing pipeline, review outputs, publish results.
	  ○ Ad-hoc: address any validation issues and resolve service desk queries associated with the TI data sets.
	• The anticipated lead time to implement R0323 is 3 months. This includes mobilisation lead time following R0323's approval.

PERFORMANCE ASSURANCE	• The Service Provider agreed that the monthly report would provide sufficient Performance Assurance visibility to monitor Supplier performance and identify emerging trends. Similarly, it was noted that the ability to further request data in API Error Codes will provide sufficient assurance to support trend analysis and deeper investigation. • System changes will be required to enable the interpretation of the data sent in monthly reports, ad-hoc reports and through the API. This will likely be Performance dashboards and a separate mechanism for viewing ad-hoc reports. These changes will support reporting against the new Tariff Interoperability Performance Assurance requirements. • New processes will be required to validate the monthly reporting data, identify trends and exceptions, request and analyse ad-hoc reports, and inform any required assurance follow up or Performance Assurance Techniques (PATs). • Resource will be required to support design, testing and readiness activity. This includes internal Performance Assurance, operational and technical input for delivery of the dashboard and ad-hoc reporting capability. • Minimal cost is expected to be incurred for the design, build and test activities associated with this Change Proposal.

	• Incremental ongoing effort and costs will be incurred in respect to the monthly review of performance data, analysis of trends or exceptions, issuing and managing PATs where applicable, and requesting ad-hoc reports where further information is required to support deeper analysis or investigation of potential issues.
MAINTENANCE AND QUALIFICATIONS	• No costs associated with this Change Proposal for Maintenance and Qualifications. • A minimum of two weeks is required to implement the proposed changes.

9.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 05 June 2026 to 26 June 2026. In total three responses were received from Energy Suppliers. The non-confidential responses have been published here.

ENERGY SUPPLIERS	• Respondents generally supported the proposed solution. • Some concerns were raised regarding the application of reporting requirements to non-TI Energy Suppliers. The Code Manager clarified that the reporting aligns with licence obligations that apply to all Electricity Supply Licence holders. • The move from daily API reporting to a monthly reporting approach was welcomed as a more proportionate and pragmatic Assurance model that reduces unnecessary burdens on Suppliers. The Code Manager noted that the performance thresholds have already been established through the wider Tariff Interoperability programme. • A respondent highlighted potential implementation challenges alongside ongoing Market-wide Half Hourly Settlement (MHHS) activities and resource constraints. The Code Manager noted that the proposed implementation of Phase 1a of Tariff Interoperability has been set by DESNZ when the new Schedule 35 Tariff Interoperability Arrangements got implemented into the REC in May 2026. • A respondent noted that while the TI API focuses on tariff data structures rather than Settlement mechanics, managing a dual stack of MHHS and non-MHHS Metering Points adds layers of operational complexity. • Some respondents highlighted that the activity of gathering and storing data for the ad-hoc reports would potentially be highly complex and time consuming. One respondent noted that the provision of at least one month to provide the data following a Code Manager request is reasonable and provides Suppliers with sufficient time to run data extraction queries, perform

	internal validations, and format the report to REC standards without disrupting business-as-usual operations. • Further clarity was requested on the information expected from non-TI Suppliers, as well as a clearer definition of what constitutes a "tariff" in cases where Consumer portfolios are primarily made up of bespoke tariff contracts. The Code Manager confirmed it would consider provision of additional guidance as and when this report is requested to help ensure a good quality response. • No quantified costs were provided, with potential effort associated with system changes, API monitoring, reporting processes, data retention, and extraction of reporting data being noted. • Respondents agreed with the benefits identified in the Change Report.

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

There are no risks or issues associated with this Change Proposal.

10.1 ASSUMPTIONS

NO.	ASSUMPTION	HOW/WHEN TO VALIDATE
A01.R0323	Party assurance approach will be developed and ready ahead of go-live.	To be validated on 18 February 2027 (implementation date).
A02.R0323	Party Qualification activity is correctly performed and any issues relating to qualifications are being communicated in a timely manner.	Ongoing post-event check
A03.R0323	A single file summarising the data collected will be passed to the DSP environment using the existing SFTP mechanism.	Validated

10.2 DEPENDENCIES

NO.	DEPENDENCIES	STATUS
D01.R0323	The processing of the new Performance Assurance data sets will require input from the REC Performance Assurance provider to ensure Performance Assurance dashboard outputs meet their requirements.	Closed

D02.R0323	There is a dependency on the DSP Service Provider to provide the data collection mechanisms (DSP Portal and SFTP) and the data processing environment.	In progress
D03.R0323	There is a dependency on RECCo to agree the format, content, frequency and transfer mechanism for data collected via the TI Monitoring Tool for use in the Performance Assurance dashboards.	In progress

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

COSTS	DESIGN/ DEVELOPMENT COSTS	IMPLEMENTATION COSTS	ONGOING OPERATIONAL COSTS
ENERGY SUPPLIERS	Minimal	Minimal	Minimal
DIGITAL SERVICE PORTAL	28 FTE days	10 FTE days	N/A
DATA ANALYTICS	5.4 FTE (27 days)	0.6 FTE (3 days)	1.4 FTE / annum (7 days/annum)
PERFORMANCE ASSURANCE	4.5 FTE	1 FTE	6 FTE / annum
MAINTENANCE AND QUALIFICATIONS	£0	£0	£0

The maximum cost estimate provided the by the Service Providers is £55,000.

The Code Manager is consulting on the maximum cost estimate provided by the Service Providers. As the solution is refined, these costs are likely to decrease. Final actual costs will be provided at Final Recommendation stage, but will not increase above the estimates provided here, and therefore any impact on the benefit case will be positive.

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVED VISIBILITY OF SUPPLIER PERFORMANCE	Enabling more effective monitoring of compliance with Tariff Interoperability obligations
ENHANCED PERFORMANCE ASSURANCE OVERSIGHT	This is done through a combination of Supplier self-reporting and independent monitoring.
GREATER TRANSPARENCY ACROSS THE MARKET	This provides confidence that Suppliers are meeting their Tariff Interoperability obligations.

11.3 COST BENEFIT ANALYSIS

The Code Manager believes the cost and effort of implementing this Change Proposal are proportionate to the benefits provided by the proposed solution.

The implementation of this change will establish a robust and proportionate framework for monitoring compliance with the TI obligations. In doing so, it will provide the necessary Performance Assurance mechanisms to oversee Supplier compliance, identify performance issues, and support ongoing operational monitoring. Furthermore, the implementation of R0323 is a key enabler for the successful delivery of TI Phase 1a, ensuring that appropriate assurance arrangements are in place from go-live to monitor and assess TI Energy Supplier performance in live operation.

The costs incurred primarily relate to the building and testing phases of the REC Portal mechanism to allow the proposed reports to be uploaded. Additional costs relate to the development and testing of proposed dashboards to allow for a transparent visualisation of the data provided, and for the data analysis needed to investigate trends and patterns.

In contrast, the benefits are significant. The change provides a strong mechanism to report Supplier compliance with TI obligations. Long term, this will enable the further TI Arrangements phased implementations (Phase 1b) to be completed efficiently, with no disruption. The benefits of this change are tightly linked to the benefits of TI Programme of work to reduce barriers to interoperability between Suppliers, devices and service providers. Overall, the benefits outweigh the costs, making this a cost-effective and strategically valuable change.

12 CASE FOR CHANGE

SELF GOVERNANCE

The Code Manager considers there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- The proposed solution appropriately resolves the original Problem Statement;

- The cost and effort of implementing and operating the proposed solution is proportionate and cost-effective;
- The impact of the Change Proposal not being implemented may cause detriment to the wider TI Programme overall; and
- The proposed solution delivers positive outcomes efficiencies in the operation of the retail energy market.

13 APPENDIX

CHANGE PROPOSAL	Link
TARIFF INTEROPERABILITY HUB	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link

14 GLOSSARY

TERM	DEFINITION
Consumer	means any person supplied (or seeking a supply) of Energy at an RMP (whether or not that person also exports or is seeking to export electricity at an RMP).
Market Participant Identifier (MPID)	means the unique identifier by which a Market Participant is identified.
Performance Assurance	means the activities undertaken by the Code Manager and the REC PAB in accordance with the Performance Assurance Schedule.
Tariff Interoperability API Technical Specification	means the Category 3 Product of that name that describes the specification for Tariff Interoperability APIs and other technical requirements.
Tariff Interoperability Application Programming Interface (API)	means any application programming interface defined within the TI API Technical Specification.
Tariff Interoperability Arrangements	means the arrangements described in the Tariff Interoperability Arrangements Schedule to facilitate the sharing of Tariff Pricing Data in accordance with the Tariff Interoperability Licence Condition.

TERM	DEFINITION
Tarriff Interoperability Energy Suppliers	means either: (a) an Electricity Supplier which is required by its Energy Supply Licence to provide Tariff Pricing Data under the Tariff Interoperability Arrangements; or (b) an Energy Supplier which is not required by its Energy Supply Licence to provide Tariff Pricing Data but has: (i) notified its intention to participate in the Tariff Interoperability Arrangements in accordance with paragraph 1.7 of the Tariff Interoperability Arrangements Schedule; and (ii) not given notice to cease participating in the Tariff Interoperability Arrangements in accordance with paragraph 1.8 of the Tariff Interoperability Arrangements Schedule.
Tarriff Interoperability Users	means any individual or organisation which wishes to access the Tariff Pricing Data.