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CHANGE PROPOSAL EXTENSION TO PLAN

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
PRIORITY STATUS	High	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers, TI Users		

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

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 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 Service Solution (CCS Solution), currently being developed by RECCo, to facilitate the required Consumer consent for RTI Users to access customer specific tariff information.

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.

This proposal will provide the Code Manager with data to assure TI Energy Supplier performance against obligations in the new REC Schedule 35 – Tariff Interoperability Arrangements.

If TI Energy 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.

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 TI Energy 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 TI Energy 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 TI Energy Supplier APIs. Together, the TI Energy Supplier reporting mechanisms, annual self-certification, and independent TI Monitoring Tool are intended to provide a proportionate and robust assurance framework that supports effective oversight of TI Energy Supplier compliance and informs future development of the TI Arrangements.

2 CODE MANAGER RECOMMENDATION

The Code Manager recommends that the Performance Assurance Board:

- **REVIEW** the extension to plan for R0323; and
- **APPROVE** the extension to plan for R0323.

3 CHANGE PLAN UPDATE

Milestone	Activity	Previous		Current	
		From	To	From	To
Definition		**21 Apr-26**	**13 Aug-26**	**21 Apr-26**	**13 Aug-26**
	Solution Development	April	May	April	May
	Legal Review	May	June	May	June
	Service Provider Impact Assessment	June	July	June	July
	Party Impact Assessment	June	July	June	July
	Business Case Assessment	July	August	July	August
Change Proposal		**13 Aug-26**	**29 Sept-26**	**13 Aug-26**	**27 Oct-26**
	Consultation	August	September	August	September
	Solution Refinement	September	September	September	October
	Final Determination	September	September	October	October
Voting		**29 Sept-26**	**29 Sept-26**	**27 Oct-26**	**27 Oct-26**
	Appeal Window	29 September	13 October	27 October	10 November

On 14 August 2026, the Code Manager issued R0323 for industry consultation. Four responses were received from Energy Suppliers. Respondents expressed support for the scope of the proposed solution; however, several queries and requests for clarification were raised regarding ad-hoc report 2120: Tariffs Not in Scope of Tariff Interoperability Arrangements.

In addition to the consultation feedback, the Code Manager identified the need to amend the structure of report 2110: Tariff Interoperability Energy Supplier API Error Code Report. Under the proposed amendment, all items using the structure 'get_tariffs_response_xx' would be removed from the report.

This amendment is intended to ensure that API reporting only includes information that can be validated and assessed by the reporting tool. The TI Energy Supplier's tariff data forms part of the HTTP response to the TI User's GET request. There is no subsequent HTTP interaction through which the TI User can reject the response and return an error code to the TI Energy Supplier (for example: 400, 404, 429, 500, 503 or 504). As a result, the inclusion of these items within the report would not provide assessable reporting data.

The Code Manager recognises that the proposed amendment represents a reduction in the scope of R0323 and, consequently, a reduction in the anticipated impacts on Energy Suppliers. Given that the amendment is limited to refining the solution and does not introduce any

additional obligations or material changes to the proposed approach, the Code Manager is not proposing to undertake a second industry consultation.

The current estimated implementation cost of the solution is approximately £42,000, with an ongoing annual cost of £5,313. These figures represent the maximum anticipated costs. The Code Manager is engaging with the relevant Service Providers to determine whether their cost assessments should be revisited. Should revised assessments be provided, any resulting changes are expected to reduce, rather than increase, the overall cost estimate.

On this basis, the Code Manager considers that extending the solution refinement activity, without issuing a further industry consultation, is appropriate and proportionate.