RETAIL ENERGY CODE

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REC CONSUMER CONSENT TOPIC SPECIFIC SOLUTION GROUP
MEETING MINUTES

MEETING	**REC_CCTSSG_26_0409**
DATE	**09 April 2026, 10:00**
LOCATION	**By teleconference**

1. INTRODUCTIONS

The Chair welcomed attendees to the meeting of the Consumer Consent Topic Specific Solution Group (CCTSSG). This session would focus specifically on the emerging themes from initial analysis of the responses to the Consumer Consent Solution (CCS) live design consultation, which closed on 25 March 2026.

2. CCS DESIGN CONSULTATION HEADLINE FIGURES

The Chair took Members through some headline figures from the CCS design consultation. They advised that:

- 31 responses had been received, with 645 answered questions. The Chair noted that there is additional detail in email bodies, cover letters and responses that will also be reviewed.
- Energy Suppliers provided the largest number of responses, and on average provided feedback on 85% of the questions.
- The most answered question was whether there should be a minimum standard for all CCS Users to use Cyber Essentials Plus.
- Questions on the scope of the CCS received the highest percentage of feedback, over 90%, whereas the technical design questions received the least at just over 60%, potentially due to the specialist nature of these questions.

The Chair thanked all respondents for taking their time to provide invaluable feedback on the design consultation.

3. EMERGING THEMES

MPW advised that following the close of the consultation, the CCS programme has now entered a detailed consultation review phase, during which the positions set out in the consultation are being assessed against the responses received. MPW emphasised that they are firmly in a listening phase, ensuring that stakeholder feedback is fully considered and respected.

Key themes arising from the consultation responses are being discussed, including areas where further consideration or additional work is required. Some of these areas have already been identified and are being progressed, while further issues are expected to emerge as the responses are reviewed in more detail. Where refinement of policy positions or solution designs is needed, these will be discussed through future meetings of the CCS Topic Solution Group.

Following completion of the consultation review, positions will be finalised ahead of the REC drafting phase. This will lead to a further consultation on the detailed solution design, covering technical, governance, user experience and REC implementation aspects. This consultation is expected to take place in summer, after which the process will move towards formally introducing the arrangements into the REC.

MPW reminded Members of the proposed CCS drafting approach, including a new Consumer Consent Arrangements Schedule, and several Category 2 documents. MPW noted some of the feedback from consultation responses on how the Customer Experience Guidelines (CEGs) will be implemented, and ensuring they are proportionate.

MPW noted that some consultation responses had requested further information on the following areas which due to ongoing procurement activities, was not included within the consultation. MPW advised that any information on these areas will be shared with Members when possible:

- Data sharing under outage
- Alignment across industry and with other data sharing frameworks (e.g., Elexon Smart Data Repository)
- Further clarity on PKI services
- Solution available and service assurance
- Functioning with DCC
- Feature releases and roadmap

MPW took Members through the level of support in the consultation responses for certain policy positions and design aspects of the CCS, and the proposed next steps for each of these areas. A member asked how the consultation sentiment ratings had been calculated. MPW responded that responses were grouped as supportive, unsupportive or neutral.

IDV

MPW advised that support had been received over the inclusion of half-hourly data within the MMP scope, although concerns were raised over potential Consumer drop-off due to the high friction of the proposed IDV approach, in particular requiring photo ID. Next steps include further discussions with potential IDV providers with the aim of providing additional detail on the identity and occupancy validation checks that will be implemented at an upcoming Topic Solution Group meeting. RECCo will also complete consumer research, testing the proposed

IDV approach, and hope to bring a summary of this work to a future meeting. MPW added that RECCo will also prioritise looking at federated IDV models for inclusion within the MMP scope.

Guest journeys

MPW advised that consultation responses were more unsupportive of guest journeys, with concerns raised over how consents will be traced for these guest accounts, and the high friction of use with the guest having to do a IDV check every time they access the CCS. MPW summarised that there is doubt from the responses whether a "true" guest journey can be achieved for CCS, compared to examples in other industries such as online shopping, given the necessity for consumer IDV. The next steps will be reconsidering whether guest journeys remain within MMP scope. RECCo's decision will be based on an internal cost-benefit analysis, as well as the feedback received in the consultation.

Occupier v Bill Payer

MPW advised that consultation responses were more supportive of RECCo's position, agreeing that the occupier is the right person to be managing consents based on their household energy data. However, concerns were raised on the operational practicality of this position. Next steps include planned discussions with the Information Commissioner's Office (ICO), and the Smart Energy Code (SEC), as well as getting additional legal advice on RECCo's current position.

Mandatory Introspection

MPW advised that support was received over RECCO's position on mandatory introspection, including recognition of the close alignment to General Data Protection Regulation (GDPR) Article 32, important given the sensitive nature of the data in question. Concerns were raised over the operational risks, high frequency of introspection checks required and how these would work alongside scheduled data sharing. Next steps involve planning engagement with EDHs and ATPs, particularly those that offered bilaterals in their consultation responses. MPW added that once procurement on the tech partner has been completed, RECCo will work with them on options for configuration of introspection depending on data sharing type, looking to balance trust against operational reality.

Sharing under outage

MPW advised that consultation responses were more supportive of RECCo's position, based on the likelihood of availability of 99.9%, which is the standard RECCo have set out during the procurement of their tech partner. Responses were happy with the planned low likelihood and frequency of outages. Concerns were raised that continued sharing of data during outages could erode Consumer trust in CCS. Next steps include engaging with the ICO to understand their recommendations for data sharing under outage. RECCo will also need to consider the operational reality of this position, particularly how it works alongside FAPI 2.0. This will be done by refining designs to low level on how data sharing under outage will work with the procured tech partner.

FAPI 2.0 and mTLS

MPW advised that consultation responses were more supportive of RECCo's position, with most respondents in favour of using FAPI 2.0, although some opposed the mTLS elements, and other responses thought the level of complexity and security was disproportionate to what is required. Next steps include working on details for the comprehensive support materials and activities that will be offered for implementation of FAPI 2.0 and working with ATPs to discuss implications of use of mTLS on existing data sharing arrangements, and how RECCo can ensure proper support for CCS adoption.

A member asked whether NESO Data Sharing Infrastructure (DSI) plans to use mTLS for IDV for EDHs or ATPs. MPW responded that they could not formally speak on NESO DSI's design decisions but noted that they are working closely with them and are broadly aligned. The member highlighted that industry perception could change significantly if the same verification mechanism were adopted across the whole industry, rather than just for CCS users, and encouraged clarity on this point. The feedback was acknowledged as valuable, and it was agreed that RECCo would formally take the action to confirm NESO DSI's position and provide a clear response back to Members.

Governance Design

MPW advised that consultation responses were broadly supportive of RECCo's position on governance design in CCS. They summarised the feedback received on each of the five "spokes" of governance:

- **Change Control** – concerns raised on CEGs being overly prescriptive, limiting innovation, and not aligned to outcome-based governance.
- **User Accreditation** – needs to be clear, accessible and proportionate. Responses highlighted elements that currently work well in SEC. MPW confirmed plans to engage further with SEC.
- **Assurance** – need to be proportionate and co-ordinated across codes.
- **Funding** – concerns raised on funding being mutualised across all consumers and a potential duplication in accreditation costs for SEC Other Users.
- **Issue Resolution** – this "spoke" received less support from consultation responses than the other areas of governance design. This was based on concerns around automatic termination of consent and desire to see lower-level design in this area. MPW advised that this design will be worked on following the completion of the procurement period for the tech partner.

A member asked about funding and cost recovery for CCS, specifically whether RECCo is considering mechanisms for broader industry contributions, including from ATPS and EDPs, given that commercial benefits will accrue across the market. While the consultation set out the REC cost-recovery model for the initial period, clarification was sought on whether alternative or

expanded cost-recovery approaches were being explored. MPW confirmed that funding arrangements remain under active review. The consultation position on initial cost recovery was generally well supported, but RECCo is still analysing the full range and nuance of consultation feedback. Further clarity and any revised thinking will be provided in a future update once this detailed review has been completed.

A member asked if there are risks to CCS timelines in light of Ofgem's open letter on a scoping study and consultation covering third-party access to smart meter data, including P494. The Chair acknowledged that this introduces uncertainties, although development of CCS continues as planned whilst the situation becomes clearer. An Elexon representative confirmed that the P494 consultation remains open until 23 April and relates only to governance changes. The SDR build itself is continuing, and no decisions have been taken to halt or delay it. It was also emphasised that smart meter data represents only a small part of the wider data set that the SDR will provide, with additional data types to be introduced over time.

The member added that Ofgem's open letter also referenced MP234 and asked if that in particular would affect CCS development. MPW clarified that the CCS MMP focuses solely on consent-based access, and public task and legitimate interest are future roadmap items. As such, there is no immediate impact on MMP, though the outcome of those reviews will be monitored closely to inform future CCS scope.

A member asked about publication of non-confidential consultation responses and whether RECCo would provide responses to individual points raised. It was confirmed that all non-confidential responses will be published, but no firm timeline has yet been set due to the volume of responses. RECCo committed to keeping stakeholders informed and indicated an intention to share a provisional timeline within the next few weeks.

4. FORWARD PLAN

MJW concluded the meeting by outlining upcoming sessions and encouraged ongoing feedback and engagement from all participants.

The next Topic Solution Group meeting on 22 April 2026 would discuss Tariff Interoperability and alignment with the CCS project. An engagement webinar is scheduled for 16 April 2026 to provide an update on project progress and plans, with focus on the past quarter. Future focuses for later Topic Solution Group meetings will be publicised as soon as possible.

MPW advised that any members with queries are welcome to email consumerconsent@retailenergycode.co.uk, and the RECCo project team will be happy to respond. MPW added that RECCO are looking for early adopters of the CCS solution and asked any interested parties to scan the QR code at the end of the meeting slides.

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ATTENDEE ORGANISATIONS

Attendee	Representing	Initials	Role
Michael Walsh	Retail Energy Code Company	MJW	Chair
Matt White	Retail Energy Code Company	MPW	Presenter
Vicky Brown	Retail Energy Code Company	VB	Committee Member
Sarah Jones	Retail Energy Code Company	SJ	Committee Member
George Roberts	Retail Energy Code Company	GR	Committee Member
Ann Perry	Retail Energy Code Company	AP	Committee Member
Teresa Thompson	Retail Energy Code Company	TT	Committee Member
Hemant Mistry	Retail Energy Code Company	HM	Committee Member
Eva Von Schaxmann	Retail Energy Code Company	EVS	Committee Member
Edma Hyskaj	REC Code Manager	EH	Secretariat

Ofgem	Publicis Sapient
Department for Energy Security and Net Zero	Centrica
Citizens Advice	CGI
Which?	SECCo
Consumer Scotland	SMS Energy
ScottishPower	PayPoint
Elexon	GreenSync
Perse Energy	National Energy System Operator
SSE	N3rgy
E.ON	Flock Associates
East Lothian Housing Association	One Utility Bill
Smart DCC	ESG Global
Raidiam	PRIME
Electralink	ScottishPower
Cadent	Ohme