RETAIL ENERGY CODE

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REC CONSUMER CONSENT TOPIC SPECIFIC SOLUTION GROUP
MEETING MINUTES

MEETING	**REC_CCTSSG_26_0729**
DATE	**29 July 2026, 14:30**
LOCATION	**By teleconference**

1. INTRODUCTIONS

The Chair welcomed Members to the meeting of the Consumer Consent Topic Specific Solution Group (CCTSSG). This session would focus on topics including Bill Payer versus Occupier, the approach to Identification and Verification (IDV), the OpenID Connect (OIDC) Registration Framework, and the Shared Signals Framework Profile.

2. BILL PAYER VS. OCCUPIER

MPW provided an update on the "Bill Payer vs. Occupier" position ahead of an upcoming REC drafting consultation. Following consultation responses, legal review, engagement with the Information Commissioner's Office (ICO), and ongoing discussions with stakeholders, the Consumer Consent Solution (CCS) Programme intends to proceed with an occupier-led approach for domestic half-hourly meter data. Under this model, the occupier of a property is considered the appropriate person to grant consent for access to data. Being the bill payer alone will not be sufficient where the bill payer is not also the occupier.

MPW explained that this approach is intended to:

- Strengthen consumer protection
- Create consistency across different data-sharing arrangements
- Ensure consent is granted by the person whose activity is reflected in the energy consumption data
- Support data sharing where the data relates directly to the occupier

Discussion focused largely on the impact of diverging from some existing industry practices. One participant noted that – as a Smart Energy Code (SEC) Other User – their organisation currently works on a bill-payer basis. They had concerns that differences introduced by the CCS approach could create challenges if existing consents need to be migrated into CCS, as the underlying basis for consent may differ. Another participant highlighted that not all organisations currently follow a bill-payer model, explaining that their organisation already uses an occupier-based approach and therefore supports the CCS position.

A further participant questioned what evidence CCS would accept as proof of occupancy if an energy bill alone were not considered sufficient. The CCS team indicated that this would be addressed through the proposed Identification and Verification (IDV) approach.

Overall, while most participants supported the occupier-led principle, some concerns remained about consistency with existing arrangements and how occupancy would be established in practice (this would be further explored in Section 3 – Identification and Verification (IDV)).

3. IDENTIFICATION AND VERIFICATION (IDV)

MPW team outlined a revised IDV approach following consultation feedback and consumer research. The original proposal relied heavily on photo identification. However, consumer feedback suggested photo ID created unnecessary friction and could act as a barrier to participation. CCS therefore intends to move away from photo ID as the primary route and instead adopt a model based on:

- Bank-based identity verification
- Credit Reference Agency (CRA) validation
- Address and occupancy signals

For the Minimum Marketable Product (MMP), consumers would verify their identity by logging into their bank through an open banking-style journey. CCS would then use CRA data in the background to establish a strong link between the individual and the address, providing confidence that they are likely to be the occupier. The consumer would then be presented with the relevant consent journey. The team acknowledged this would not be a permanent or complete solution. Future iterations will need to support non-digital journeys, delegated authority arrangements and broader accessibility requirements.

One participant questioned how the proposed model would serve people without bank accounts or without a CRA record. They cited indications that significant numbers of consumers could fall into these groups and asked what would happen when the process failed. MPW accepted that some consumers would not be able to use the initial MMP journey. They argued that the overlap between these groups and likely MMP users would be relatively small but acknowledged the need for future enhancements.

One participant questioned whether consumers consistently keep their banking address information up to date, particularly tenants who move frequently. MPW responded that the CRA stage would rely on a wider range of address indicators rather than banking data alone. They noted the challenge lies in striking the right balance between confidence and inclusivity. Setting the threshold too high could exclude consumers, while setting it too low could weaken assurance.

One participant suggested tenancy agreements could provide strong evidence of occupancy (particularly where clauses already grant permission for access to consumption data). They argued this would support landlords pursuing decarbonisation and energy efficiency programmes. MPW acknowledged the value of the use case but indicated it was unlikely to

form part of MMP. He also highlighted the need to preserve consumers' ability to revoke consent, which may be complicated if consent is embedded within tenancy agreements.

One participant welcomed the move away from photo ID but argued that housing associations often already hold evidence of identity, occupancy and MPxN linkage. In those circumstances, requiring additional bank and CRA checks could introduce unnecessary friction. They highlighted concerns around new tenancies, where CRA data may not yet reflect occupancy despite the landlord being able to verify it directly. MPW accepted this may represent a distinct use case and agreed to explore it further through bilateral discussions.

One participant challenged whether bank verification and CRA data genuinely prove occupancy. They argued that neither source has historically been used as a definitive occupancy check and questioned the CCS Programme's confidence in the approach. MPW maintained that partner engagement and product research had given confidence that sufficient assurance could be achieved through a combination of signals, although further detail would emerge as the design develops.

One participant noted that several trusted consent models already operate successfully using Know Your Customer (KYC)-based approaches. They suggested existing solutions and experience within industry could help inform CCS design decisions and queried whether the MMP was more complex than necessary. MPW agreed to continue exploring these existing approaches through further engagement.

4. OPENID CONNECT (OIDC) REGISTRATION FRAMEWORK

CE and GR introduced the proposed OIDC Federation Registration Framework, which will support participant onboarding and trust management. The objective is to allow CCS to determine whether Authorised Third Parties (ATPs) and Energy Data Holders (EDHs) are genuine, current and accredited without maintaining a separate manual register.

The proposal centres on using the Trust Framework as the source of truth. Participant metadata would be stored and signed within the Trust Framework, allowing CCS to verify accreditation cryptographically. CCS would retrieve current information directly from the Trust Framework rather than relying on manual registration processes CE reiterated that participants would not need to build or operate the federation framework themselves. Their primary responsibility would be maintaining accurate metadata in the Trust Framework.

The session also covered onboarding processes and the technical obligations expected of ATPs and EDHs, including certificate management, token handling, key rotation, directory maintenance and validation activities.

Discussion focused mainly on technical implementation. One participant asked whether CCS intended to adopt post-quantum cryptography. The CCS team confirmed the issue was under consideration but could not yet provide a definitive position. They agreed to take the question away and return with a clearer answer.

One participant raised concerns based on lessons learned from the Perseus programme. They warned that implementing mutual Transport Layer Security (mTLS) in modern cloud

environments can be difficult and require significant support for participants. He suggested CCS should carefully consider the operational impact on smaller organisations.

Discussion also focused heavily on Public Key Infrastructure (PKI) and certificate management. One participant questioned the proposed 30-minute caching period for CCS signing keys and challenged whether the balance between security and operational burden had been fully explored. He suggested the proposal differed significantly from approaches used elsewhere, including smart metering.

One participant questioned aspects of certificate revocation checking and suggested alternative approaches that could reduce processing overhead while maintaining appropriate levels of trust and security.

CE and MPW recognised that several questions remained unresolved in this area and agreed that a dedicated future session on PKI and certificate management could be beneficial.

5. SHARED SIGNALS FRAMEWORK PROFILE

CE and GR introduced the Shared Signals Framework (SSF) as the proposed mechanism for notifying participants about important changes, particularly around consent status. He explained that access tokens provide the primary mechanism for enforcing consent. However, a challenge arises where data retrieval takes place asynchronously. In those cases, an EDH may not know that consent has been revoked after the original access token was presented but before data is returned.

SSF would provide a standardised notification mechanism to communicate state changes such as consent revocation. CE proposed adopting SSF primarily to support these consent-related notifications. He stressed that SSF would complement, rather than replace, the existing token model. The initial implementation would focus on consent revocation events, while providing a foundation for future notification use cases.

The main discussion centred on whether the proposed approach was proportionate. One participant observed that CCS is creating a highly responsive technical process for consent revocation while occupancy verification remains comparatively slow and imperfect. They questioned whether the design was optimising the right area of the problem and suggested there may be an imbalance between effort spent validating entry into the system and effort spent managing withdrawal from it. CE acknowledged the point, explaining that occupancy change events remain under active consideration and are expected to form part of future development beyond MMP.

One participant asked whether the proposal would also apply to the Tariff Interoperability scheme. MPW confirmed that the same approach is intended to be reused across multiple use cases, including tariff-related scenarios, with different event types flowing through the same framework.

One participant suggested future presentations should focus less on explaining industry standards and more on demonstrating why those standards are the right fit for CCS-specific

requirements. MPW agreed this was a fair challenge and acknowledged the need to strike the right balance between technical detail and practical application.

6. 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 was scheduled for 12 August 2026, with the primary topics to be confirmed. The next Engagement Webinar is due to be held in September 2026.

MPW advised that any stakeholders with queries were welcome to email consumerconsent@retailenergycode.co.uk, and the RECCo project team will be happy to respond. They 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.

ATTENDEE ORGANISATIONS

Attendee	Representing	Initials	Role
Michael Walsh	Retail Energy Code Company	MJW	Chair
Matt White	Retail Energy Code Company	MPW	Presenter
George Roberts	Retail Energy Code Company	GR	Presenter
Christian Eloysio	Raidiam	CE	Presenter
Paul Rocke	REC Code Manager	PR	Secretariat

Ofgem	Smart Energy Code Company (SECCo)
Data Communications Company (DCC)	East Lothian Housing Association
E.ON	Smart Data and Technology Alliance (SDATA)
So Energy	n3rgy
Perse Energy	Stark
ESG Global	CGI
Publicis Sapient	Scottish Power
Flock Associates	Raidiam
Department for Energy Security and Net Zero	SMS Energy
Centrica	Heriot Watt University
Elexon	Talan