



Business Case

Consumer Consent Service 2026–27

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Executive Summary

The Consumer Consent Consultation, being run by Ofgem, aims to empower energy consumers by providing secure, transparent, and efficient management of their energy data. This initiative aligns with the broader goals of enabling tailored services, fostering innovation, and supporting the UK's sustainability and Net Zero objectives.

By addressing inconsistent consent practices in the energy sector, the service promises to improve user experiences, reduce barriers to innovation, and enhance sector-wide efficiency.

On 29 April 2025, Ofgem formally appointed the Retail Energy Code Company (RECCo) as the Delivery Body for the Consumer Consent Service. This Business Case sets out the scope of work and associated costs required to implement and operate the Consumer Consent Service, providing a clear framework for delivery and ongoing management.

Strategic Objectives

1. Empower consumers with greater control over the consensual sharing of their energy data.
2. Promote the right level of protection with robust privacy measures.
3. Enable innovation of tariffs and products by lowering barriers for third-party services.
4. Support decarbonisation and sustainability goals.

Key Features

- A phased approach starting with a Minimum Marketable Product (MMP) to minimise risks while ensuring scalability.
- Robust privacy and security measures, aligned with GDPR and other regulatory requirements.
- Iterative development guided by continuous stakeholder feedback and agile methodologies.
- Inclusion of vulnerable consumer groups to ensure accessibility and equity.

Stakeholder & Regulatory Alignment

The consultation has been broadly supported with some mixed responses from industry stakeholders. By fostering collaboration across energy providers, regulators, and consumer advocacy groups, RECCo aims to ensure the service is both inclusive and effective. The plan includes leveraging existing frameworks such as the Retail Energy Code (REC) to streamline governance and implementation.

Economic & Financial Outlook

Anticipated project cost estimates are as follows:

- £6.2m: Delivery of MMP (2025–6: £1.7m, 2026–7: £3.9m, 2027–8: £0.5m).
- £2.0m: Enduring Service Delivery, Year 1.
- £0.9m: Additional annual requirement from Change Allowance for post-MMP project delivery.

NB: Cost estimates have been provided with the best information available at the time of writing. However, relatively high levels of cost uncertainty remain, given that the Consumer Consent Service remains in the Discovery & Design Phase and material procurement 'lots' have yet to be completed.

- Cost-efficiency measures include utilising pre-existing solutions and adopting a scalable design.
- Critical roles like project management, data protection, and service delivery would be staffed to support development and operations.

Management & Delivery

- A governance framework with four workstreams, comprising Programme Governance, Stakeholder Engagement, Commercial & Procurement, and Product (including Regulatory, User Research & Consumer Engagement, Information Security & Data Protection, Technical, Financial & Service Delivery).
- Agile delivery.
- Emphasis on co-development with stakeholders to foster innovation and inclusivity.

Risks & Mitigation

Potential challenges include data quality issues, scalability risks, and user adoption barriers, including building consumer and third-party trust. Mitigation strategies involve proactive stakeholder engagement, robust and iterative testing, and strong financial oversight to ensure the service meets its objectives effectively.

Conclusion

The Consumer Consent Service represents a transformative step in modernising the retail energy market, fostering consumer empowerment, and driving sector-wide innovation. With the potential to revolutionise new products and energy services with the provision providing energy data, this initiative aligns with national goals for efficiency, sustainability, and consumer protection. RECCo and the REC are well-positioned to lead this effort, leveraging their expertise and stakeholder collaboration to deliver value for all.

Introduction

Consumer Consent is key to a more transparent, efficient, and consumer-centric energy market. By giving consumers control over their energy (gas, electric, heat, or other) data, enabling innovation through third-party services, and advancing sustainability goals, it will support the transformation of how energy is managed and consumed.

A phased approach, starting with a Minimum Marketable Product (MMP) and expanding functionality through iterative development, will minimise risks and, with appropriate design and consultation, ensure scalability to benefit all consumers, including vulnerable groups. The proposed budget would support these goals while delivering value for money and ensuring long-term sustainability.

With its proven delivery expertise, RECCo is ideally suited to develop and oversee the Consumer Consent System under the REC, whose objectives and mission to protect consumer data and improve retail energy market efficiency align with this initiative.

Following a comprehensive consultation and rigorous assessment of stakeholder feedback, Ofgem formally appointed RECCo as the Delivery Body for the Consumer Consent Service. This decision reflects broad industry support for RECCo's governance expertise and its alignment with the sector's commitment to consumer-centric outcomes. RECCo's appointment marks a pivotal step in advancing a trusted, standardised approach to energy data consent, ensuring robust regulatory oversight and accountability under the REC. The decision recognises the need for a hybrid architecture model, balancing centralised governance with decentralised technical delivery, and sets the foundation for collaborative development through dedicated working groups.

RECCo will lead the design and implementation of the Consumer Consent Service, supported by ongoing engagement with Ofgem, industry stakeholders, and consumer advocacy groups, to deliver a solution that is secure, inclusive, and responsive to evolving market needs. This milestone initiates the transition from policy development to operational delivery, with RECCo empowered to drive forward the programme in accordance with Ofgem's strategic vision and regulatory standards.

This Business Case outlines the scope of work and associated costs required to implement and operate the Consumer Consent Service, providing a clear framework for delivery and ongoing service management. In particular, the document provides a Business Case that outlines our planned approach to fulfilling the role. It does not cover the broader Business Case for Consumer Consent, which will be covered within Ofgem's Impact Assessment.

This Business Case is designed in alignment with the HM Treasury's Green Book methodology, reflecting RECCo's commitment to transparency in its Forward Work Plan. It complements, rather than replaces, the regulator's role in Business Case activities.

Throughout this document, we use the term "Consumer Consent Service" to encompass the comprehensive delivery of systems, technology, mechanisms, processes, governance, and capabilities required to effectively meet the needs of consumers and the market. We're dedicated to creating and delivering value for energy consumers, with innovation at the core of this commitment. The Consumer Consent Service, when implemented effectively, will empower individuals by giving them control over their energy data, fostering trust, enabling new services, and driving sector-wide innovation.

Delivering this service requires navigating a complex landscape of interdependencies, balancing security, cost efficiency, and service resilience, while addressing the diverse needs of various stakeholders. We're committed to consulting with stakeholders, including consumers, government, regulators, energy providers, and wider market participants, through ongoing engagement and collaboration at each project stage.

Consumer Consent has the potential to revolutionise energy services for consumers. We look forward to working together to develop a service that shapes a future-ready energy market.

Strategic Case

Strategic Summary

A Consumer Consent Service will empower consumers in the evolving energy market, enabling them to access tailored services, achieve cost savings, foster inclusivity, and contribute to progress toward Net Zero goals. It aims to address inconsistent consent practices, streamline processes, improve user experiences, and reduce barriers to innovation.

Guided by Ofgem’s design principles, the service would enhance data control, build trust, and foster collaboration. Objectives include empowering consumers, promoting efficiency, enabling innovation, ensuring robust privacy, and supporting decarbonisation.

Following Ofgem’s formal appointment of RECCo as the delivery body, the project has transitioned into an active mobilisation phase. RECCo has assembled the project team and commenced the design phase, adopting an iterative approach and engaging proactively with stakeholders to ensure the service is fully aligned with regulatory, market, and consumer requirements. This Business Case sets out the costs and programme of work required to deliver and operate the Consumer Consent Service, underpinning our commitment to sustainability and long-term sector benefits.

The Imperative

The Consumer Consent Service will be pivotal in engaging consumers with the evolving energy market by enabling:

- More tailored services that empower individuals to reduce costs and enhance service quality.
- Demand shifts to more economical times, which will contribute to overall cost reductions, benefiting all consumers—not just those using the service.
- Inclusivity for timely support for those who need it most.
- Accelerated progress toward Net Zero goals, including decarbonised electricity by 2030, through more efficient energy system planning, when combined with other Ofgem and government initiatives.

Modern technologies provide an opportunity to transform energy services by enhancing data-driven services that require consumer consent. To achieve this, services must be trustworthy, transparent, accessible, and user-friendly, giving consumers better control over who accesses their data and how it is used.

Ofgem’s Consumer Consent consultation highlighted the critical role of digitalisation and effective data use in achieving Net Zero while minimising consumer costs. By granting consumers control over their data, consent services can deliver measurable benefits. Similarly, Citizens Advice underscores the need for consumer-centric services that improve outcomes for consumers and the sector alike.

Currently, inconsistent approaches to obtaining and managing consumer consent hinder wider innovation and confuse consumers. A coordinated sector-wide approach could streamline processes, enhance consumer experiences, encourage competition by reducing barriers for new entrants, and support the ongoing evolution of services.

In the long term, a robust Consumer Consent Service could extend its benefits beyond the energy sector. By federating with consent systems in other industries, it can unlock broader opportunities, enabling consumers to benefit from seamless data sharing across sectors while effectively serving their immediate energy needs.

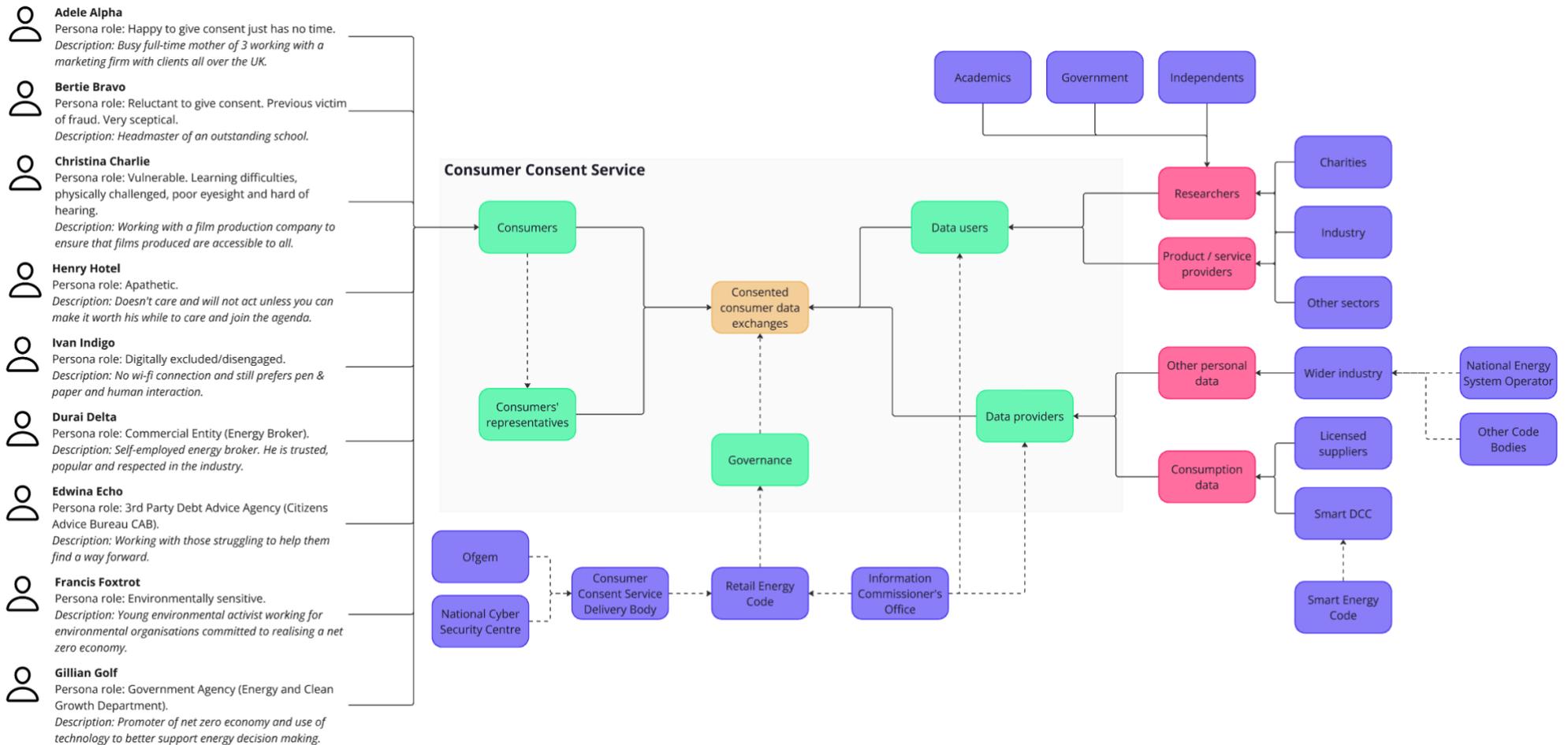
Benefits

Stakeholders stand to gain many, wide-ranging benefits from the delivery of a Consumer Consent Service. We have summarised a qualitative view of these benefits below. We expect that wider benefits will also be achievable in the long term.

 Consumer	 Industry	 Regulatory
<ul style="list-style-type: none"> ✓ Consumer Empowerment, informed decision making and control ✓ Enable consumers to take advantage of energy-saving services ✓ Consumer Trust, transparency in data being shared, protection and inclusion of vulnerable ✓ Consumers will be empowered to reduce their energy consumption, achieving net-zero goals by switch to greener tariffs ✓ Optimise energy consumption and contribute to decarbonisation ✓ Enhanced Competition, in the energy market, provides better services and drive down prices by encouraging the development of new, tailored energy services ✓ Shifting energy demand to the most economic point will support an overall reduction in energy costs, benefitting all consumers even if they do not utilise the service 	<ul style="list-style-type: none"> ✓ Utilise efficiencies across other REC obligations to realise synergies to reduce time and cost ✓ Market Efficiency, standardised consent platform will make it easier for third-party providers ✓ Enhanced Competition, foster competition in the energy market, driving down prices and encouraging the development of new, tailored energy services ✓ Innovation to support for new energy services ✓ Flexibility in new technologies and innovations within the energy sector, encouraging continuous evolution ✓ Optimise energy consumption and contribute to decarbonisation 	<ul style="list-style-type: none"> ✓ Efficient, future-focused strategic investments made with the consumer front of mind ✓ Regulatory Alignment benefits of aligning the Code with the delivery body ✓ Utilise efficiencies across other REC obligations to realise synergies to reduce time and cost ✓ Utilisation of 2023 Open Data project focus areas and key principles for solution development ✓ Innovation to support for new energy services ✓ Flexibility in new technologies and innovations within the energy sector, encouraging continuous evolution ✓ Alignment with net-zero goals, more efficient, secure, and sustainable energy future

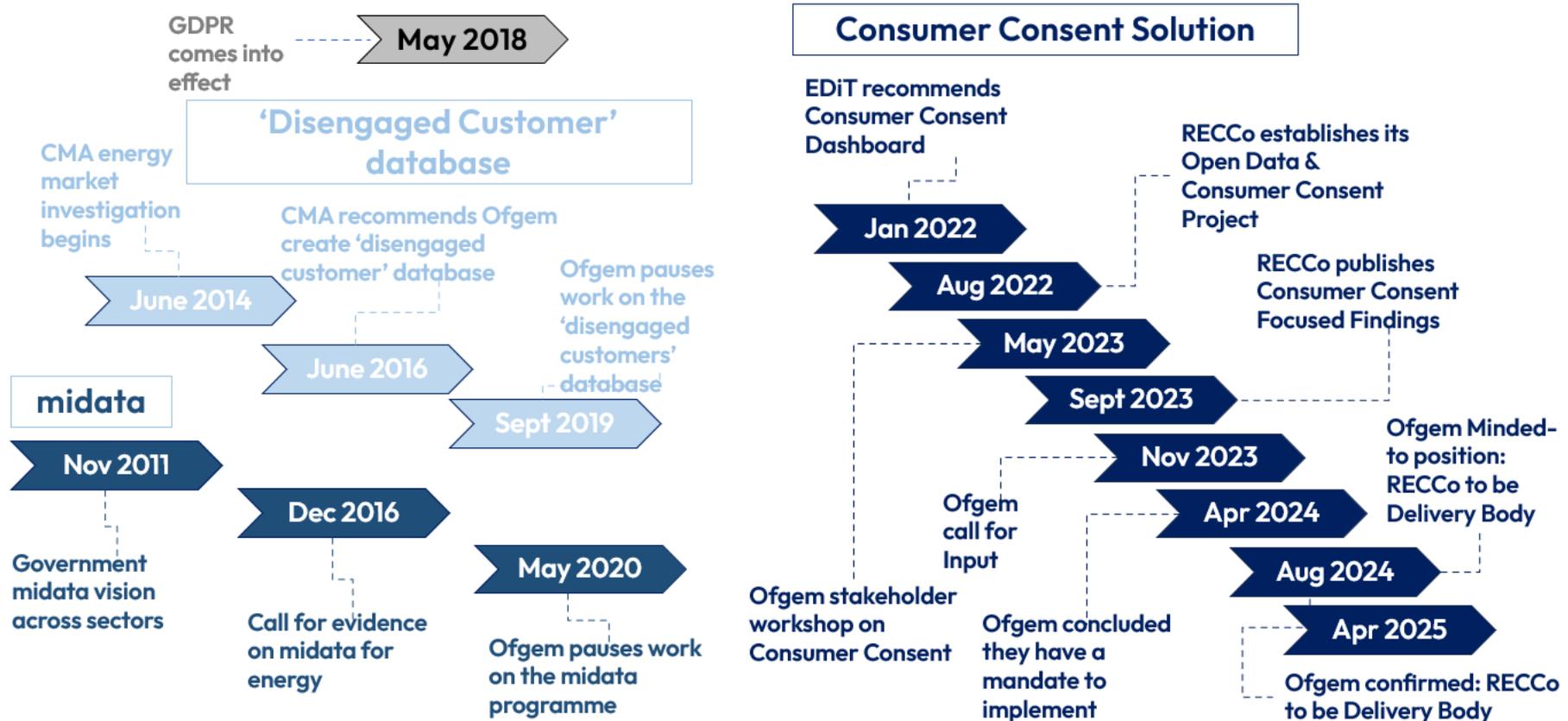
Stakeholders

To provide context, here we provide a high-level outline of the key stakeholders who have a role to play in a Consumer Consent Service.



History

Improving the management of consumer data has been a key topic in the energy sector for an extended period. Various programmes have addressed related issues by investigating and making investments in putting consumers’ data to better, more ethical, and consensual use. Much can be learned from these past experiences, and they provide context for current developments and decision-making. We provide a timeline of these efforts below.



Regulation

Ofgem’s engagement on the Consumer Consent Service began with a [Call for Input](#) in November 2023, inviting feedback on the need and potential options for a Consumer Consent Service in the energy sector. While most stakeholders supported a regulated Consumer Consent Service as a viable approach, some expressed concerns about its complexity, cost, and implications for data privacy.

In August 2024, Ofgem published its Consumer Consent Service [consultation](#), outlining proposed design principles, key features, and a recommendation to appoint RECCo as the Delivery Body. The proposed principles, confirmed in the Published Ofgem Consumer Consent paper, include:

- Simple and low friction
- Interoperable
- Agile, flexible, and scalable
- Transparent and informative
- Inclusive by design
- Secure by design

The consultation and subsequent decision paper called for a digital solution that allows consumers to share their energy data with trusted third parties, manage consent processes (granting, reviewing, and revoking), and comply with regulatory requirements. The solution must promote trust and foster innovation in the energy sector.

As part of our preparatory and design work, we’re addressing these requirements and considering diverse stakeholder views, including those with reservations about the solution. To optimise the design, we’re engaging continuously with stakeholders through working groups, engagement days, bilateral meetings, and other channels to ensure we consider all stakeholder views, including those who did not participate in Ofgem’s consultations. This early and ongoing engagement ensures that the Consumer Consent Service effectively reflects stakeholder input and meets Ofgem’s standards. For further details, see the Management Case section.

Objectives

Ofgem’s Consumer Consent Service consultation outlined two key roles: (1) Governance of the Consumer Consent Service and (2) Delivery Body for its implementation. In April 2025, Ofgem confirmed that RECCo would be responsible for both these roles.

We’ve drafted high-level objectives, listed in no particular order, to guide our efforts, ensuring the service upholds its commitments to transparency, security, innovation, and consumer empowerment.

No.	Objective	Comment
1	Empower consumers with greater data control	Develop a flexible service that allows consumers to control their data-sharing preferences easily and securely
2	Promote consumer trust through transparency and accountability	Ensure the service creates consumer trust by providing clear and transparent data-sharing practices
3	Support market efficiency and reduce friction for service providers	Deliver a service that streamlines data sharing processes across the energy market, increasing efficiency

4	Facilitate innovation by enabling third-party services	Foster a competitive and innovative energy market by lowering barriers to entry for service providers
5	Ensure robust security and privacy protections	Embed security and privacy-by-design principles to protect consumer data and comply with regulatory standards
6	Contribute to decarbonisation and sustainability goals	Support the energy sector's transition to a low-carbon economy by encouraging greater consumer participation
7	Develop an agile, flexible, and scalable service	Ensure the platform is built to scale and evolve with the energy market's future needs
8	Deliver value for money	Ensure cost-effective delivery by providing a high-impact service with efficient use of resources

These objectives ensure that the Consumer Consent Service would deliver the necessary outputs to achieve the desired outcomes of consumer empowerment, market efficiency, and innovation, while upholding privacy, security, and sustainability standards.

Economic Case

Economic Summary

As the delivery body, RECCo will assess the options for delivering a Consumer Consent Service against Critical Success Factors (CSFs), including value for money, supplier capability, industry support, risk mitigation, and alignment with strategic goals. These CSFs are key to ensuring the service addresses consumer needs and complies with regulatory objectives.

The responsibility for a market-wide Cost–Benefit Analysis (CBA) lies with the regulator, with RECCo providing support as needed. In November 2025, Ofgem published its draft Consumer Consent Impact Assessment for consultation, with its finalised version due in early 2026.

Critical Success Factors

To select the best option for delivering the Consumer Consent Service, it is essential to evaluate available options against clearly defined CSFs. These represent the fundamental elements necessary for the project to meet its objectives successfully. While more detailed options are needed for a thorough evaluation, an initial set of CSFs has been developed to ensure consumer and stakeholder needs remain central to the service.

These CSFs align with the project’s objectives, ensuring RECCo maintains control, delivers value for money, and confirms market capability to implement the chosen option. They also account for future flexibility, long-term vision, and delivery risks. The draft CSFs are outlined below, pending further input and prioritisation to be completed in the design phase through consultation.

No.	Critical Success Factors
1	Benefit to consumer
2	Enable positive behaviours (i.e., cohesion, outcomes, focus)
3	Alignment to REC objectives
4	Value for money
5	Mitigation of delivery and operational risk
6	Industry acceptance/support
7	Supplier capacity/capability
8	Ability to flex, intercept or address changes to the licence as directed by the regulator/DESNZ
9	Minimise interface and handoff risks between providers
10	Provide the correct control, knowledge, and responsibility boundary for RECCo in line with licence obligations / or under the REC

Evaluating Options

In Ofgem's consultation on the Consumer Consent Service, stakeholders were asked to provide views on centralised, decentralised, or hybrid delivery models. In practice, different components of the service will likely align with different models. For instance, a list of accredited organisations may be centralised, while data transfer processes could be decentralised.

At this stage, a preferred delivery option has not been finalised, although it is likely to be a hybrid for different components of the service. To make an informed decision, we must further define the delivery options and apply CSFs to evaluate them. RECCo is consulting with a broad range of stakeholders and will continue to do so during the design phase. RECCo will publish solution design documents for consultation in early 2026 and will take consultation responses into account before finalising the design.

This collaborative approach will ensure the system design is guided by industry and stakeholder input, maximising its potential to deliver economic and consumer benefits.

Cost-Benefit Analysis

Conducting a CBA is a standard practice for building the economic case for investments like the Consumer Consent Service. Determining the necessity and scope of a CBA falls under the regulator's remit. RECCo has and will continue to support Ofgem as needed to facilitate this process, utilising the REC Change process to implement any required adjustments effectively.

Existing Marketplace Solutions

RECCo is engaging with organisations that offer existing solutions which could be utilised or adapted to enhance the delivery of the Consumer Consent Service. Leveraging pre-existing solutions has the potential to reduce development time and costs compared to building a fully bespoke, 'greenfield' solution. During the preparatory stage, our primary objectives were to:

1. Understand the existing marketplace and available solutions
2. Learn from the experiences of these organisations regarding challenges, complexities, and risks

Having conducted market research during our mobilisation phase, we made the decision to proceed with multiple Functional Prototypes to gain a greater understanding of the solutions available and how these would meet the capabilities required. These functional prototypes will be tested with stakeholders and used to refine the Consumer Consent Service requirements and finalise the solution design.

Management Case

Management Summary

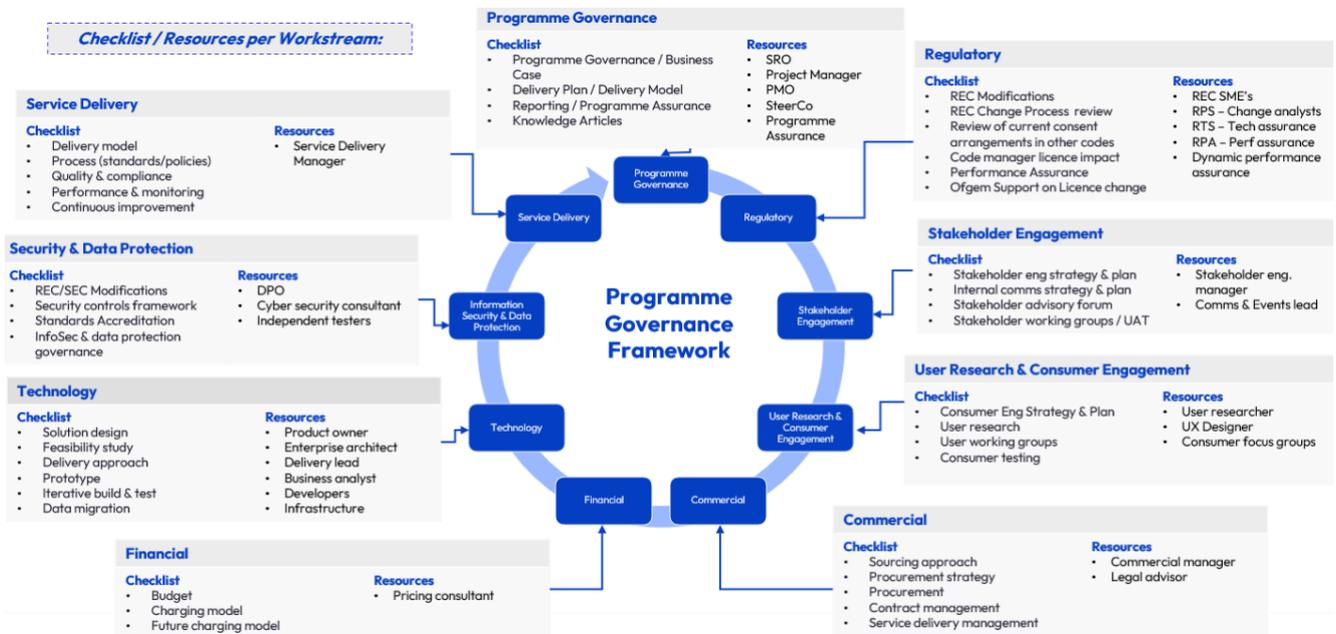
The Consumer Consent Service would empower consumers, enhance energy market efficiency, and support sustainability goals, such as achieving Net Zero. RECCo is leveraging an agile delivery approach, focusing initial efforts on delivering an MMP, followed by iterative feature releases to build a comprehensive service. Starting with an MMP will enable us to release a small, usable product to the market with sufficient features to achieve initial consumer satisfaction, while we continue to learn from user feedback and iterate until a comprehensive service is established. The costs outlined in this Business Case relate to MMP delivery, and further iterations will be implemented through the REC Change process and budget.

A comprehensive programme governance framework is being deployed, comprising four workstreams: Programme Governance, Product, Stakeholder Engagement, and Commercial. Each is described more fully below. Risks are actively managed using the RAID process, addressing concerns such as design timelines, data quality, scalability, and security. RECCo will procure an external organisation to provide risk-based programme assurance, thereby increasing confidence both internally and externally in the design and application of the programme governance framework.

Stakeholder collaboration and inclusivity are central to the service’s development, ensuring alignment with industry needs and consumer priorities. RECCo’s approach emphasises transparency, continuous improvement, and robust financial oversight to maximise value while fostering trust and innovation in the evolving energy market.

Programme Governance Framework

We identified the following nine key workstreams required to deliver the Consumer Consent Service, which have since been consolidated into four: Programme Governance, Product, Stakeholder Engagement, Commercial & Procurement. Below is an outline of these workstreams, followed by an introduction to each.



1. **Programme Governance:** Establishes robust governance to enable agile decision-making for successful design, delivery, testing, and implementation. It includes specific involvement from industry parties, Ofgem, end users, and service providers in relation to governance.
2. **Product:**
 - a) **Regulatory:** Ensures compliance, monitoring, and reporting requirements under the REC are met. Includes drafting REC Change Proposals and enabling agile delivery of the programme.
 - b) **User Research & Consumer Engagement:** Gathers insights to align the service with user expectations. Focuses on trust-building, understanding user pain points, and creating personas, use cases, and prototypes for feedback.
 - c) **Information Security & Data Protection:** Implements robust security practices to protect consumer data, ensuring compliance with security measures and maintaining ISO27001 accreditation beyond project completion.
 - d) **Technical:** Captures and implements consumer consent requirements, conducts feasibility studies on existing solutions, identifies gaps, and ensures the solution meets consumer, industry, and REC obligations.
 - e) **Service Delivery:** Develops an operational delivery model to meet REC or other code obligations. Manages processes, teams, and tools, driving efficiency, quality, and customer satisfaction while ensuring ongoing collaboration and service improvements.
 - f) **Financial:** Defines an appropriate charging model and principles for the Consumer Consent Service.
3. **Stakeholder Engagement:** Develops and extends a framework for engaging stakeholders and end users. Facilitates collaborative design, aligns interests, enables consultation, addresses concerns, and prepares for successful delivery.
4. **Commercial & Procurement:** Establishes the commercial framework necessary for delivering the Consumer Consent Service.

Co-Develop with Market

We aim to co-develop the Consumer Consent Service in collaboration with the market, leveraging an open working approach to foster innovation and inclusivity. By adhering to Ofgem's Data Best Practice principles, we will ensure transparency, build trust, and strengthen stakeholder engagement. Utilising the REC Change Process, we will promote transparency to deliver a robust, comprehensive service aligned with market needs and regulatory standards.

Following the appointment of RECCo as the Delivery Body in April 2025, Ofgem set up the following Industry Working Groups.

Implementation & Governance

- Provide advice and feedback to RECCo and Ofgem to help inform direction and decision-making on assessing and communicating stakeholder impacts of regulatory changes, including code modifications due to licence changes, following established change control procedures.
- Sharing expertise in the development of the solution's design and socialising the design process with the industry to align with existing initiatives.
- Assisting RECCo with the design and development of a trust framework, or other usage governance model, to be signed off by the Delivery Body.
- Ensuring timely and adaptive implementation and understanding of regulatory changes.

Consumer Protection & Accessibility

- Provide advice and feedback to RECCo and Ofgem to help inform direction and decision-making on protecting consumers, service accessibility, and service usability.
- Safeguard consumer rights while ensuring the Consumer Consent Service is inclusive, equitable, and user-friendly.

Technical Design & Security

- Provide advice and feedback to RECCo and Ofgem to help inform direction and decision-making on security and technical design.
- Ensuring the Consumer Consent Service is designed and developed with adherence to agreed-upon fundamental design principles: simple and low-friction, interoperable, agile, flexible, scalable, transparent and informative, inclusive by design, and secure by design.
- Sharing expertise in the development of the solution's design and socialising the design process with industry to align with existing initiatives.
- Advise the Delivery Body on the development of the solution so that it is sufficiently open-ended to consider future use cases and prevent siloed development.
- Make recommendations about equality of access, considering user needs to prevent imbalance, or perceived imbalance, between those using the service.
- Make recommendations that the development of the solution meets suitable cybersecurity standards, including quantum-safe encryption.

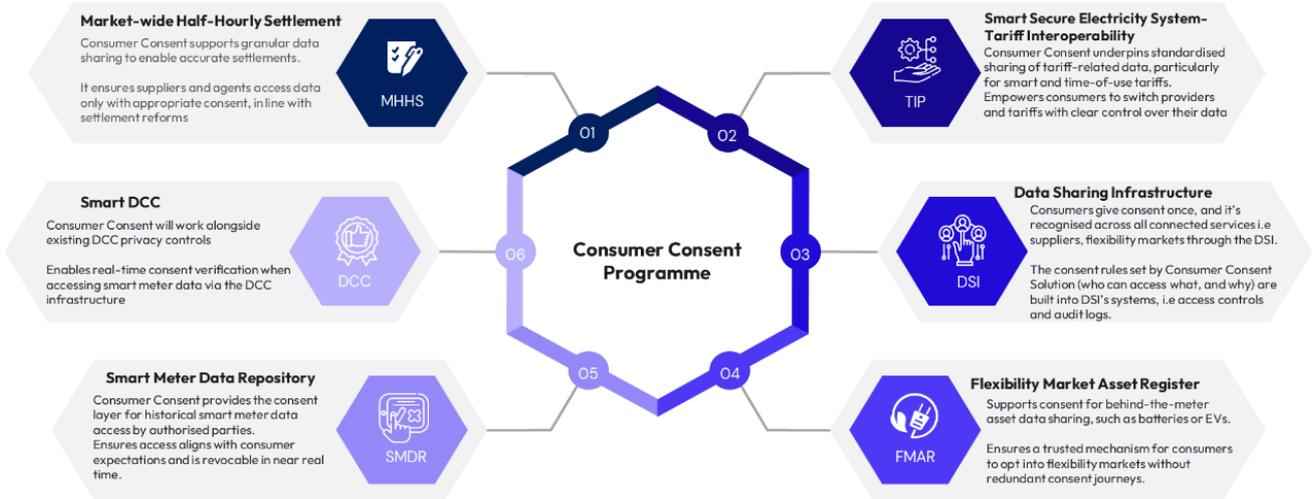
Ofgem will continue to chair these working groups until December 2025, at which point they will move over to RECCo to manage and chair.

Adopting an agile delivery approach with iterative and incremental progress enables rapid adjustments based on continuous feedback. This enables earlier delivery of consumer value, increasing benefits over time while keeping security and consumer needs at the forefront. Through this collaborative and adaptive approach, we're committed to empowering consumers and advancing the Great Britain retail energy sector.

Stakeholder Engagement Approach

RECCo has been actively engaging with a diverse range of industry experts, including suppliers, network operators, consumer bodies, technology providers, innovators, and housing associations, to ensure the Consumer Consent Service is informed by broad and representative market perspectives. Our engagement approach uses multiple communication channels and tools: a dedicated solution hub on the REC Portal, monthly newsletters, weekly bulletins, LinkedIn updates, news articles, FAQs, a glossary, and outputs from the monthly Consumer Consent Service working groups. Together, these channels ensure transparent, consistent, and inclusive communication, helping stakeholders stay informed and engaged throughout the design and delivery phases.

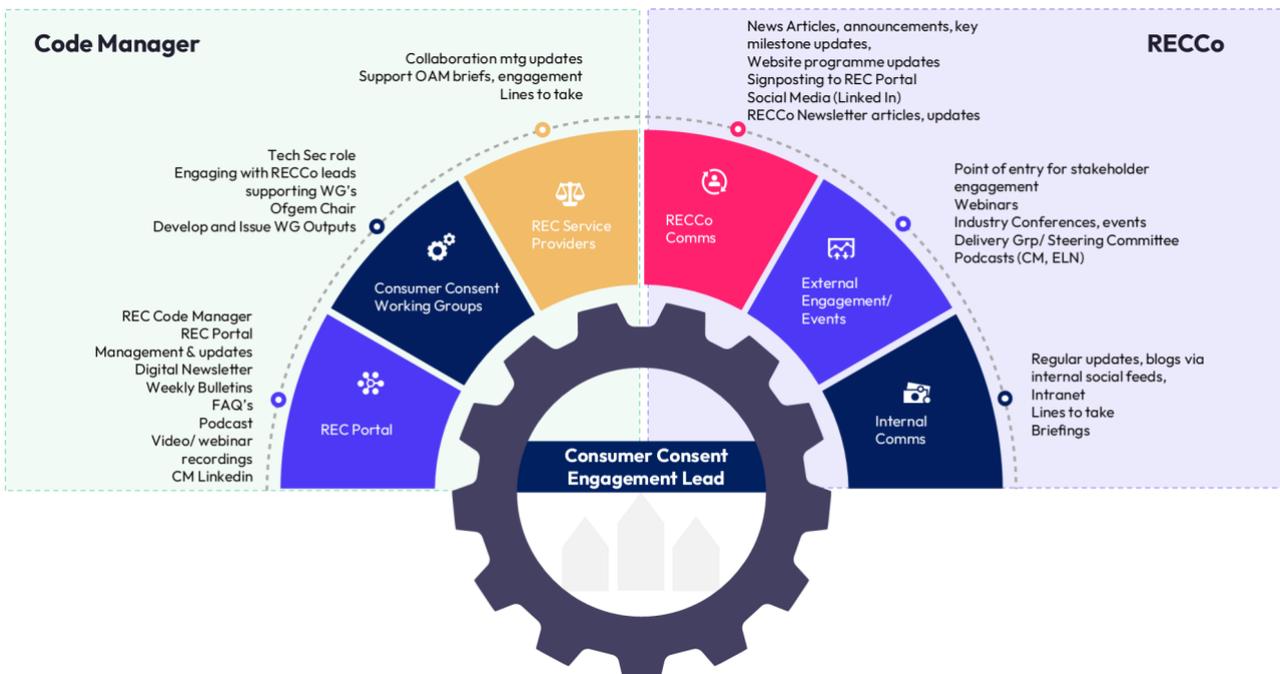
Importantly, we're collaborating with **Ofgem**, **DESNZ**, **Elexon**, and **NESO** to ensure that what we're building aligns and interoperates with other key initiatives. It is still early days, but our goal is to keep things simple and connected — integrating programmes such as **Tariff Interoperability** [part of the **Smart Secure Electricity Systems (SSES)** programme], **Elexon's Smart Data Repository**, and **NESO's Data Sharing Infrastructure** wherever possible. This joined-up approach ensures the Consumer Consent Service complements wider market developments, avoids duplication, and supports a more cohesive energy data ecosystem.



Current stakeholder sentiment is highly positive, with 88% expressing support for the Consumer Consent Service approach. Feedback highlights strong appreciation for RECCo’s transparency, focus on interoperability, and user-centred design, alongside a growing interest in the technical and regulatory detail underpinning the service. This demonstrates increasing stakeholder confidence in RECCo’s ability to deliver a trusted, inclusive, and future-ready solution.

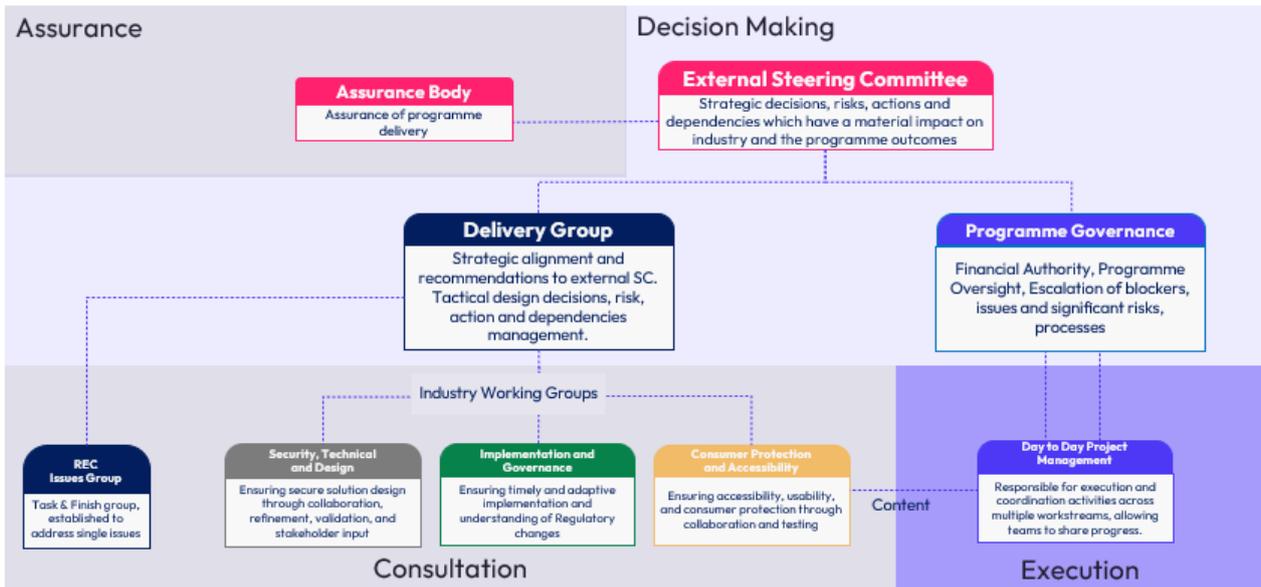
RECCo’s stakeholder engagement model prioritises inclusivity and representation for all relevant parties, including small suppliers and consumer advocacy groups. Supported by the REC Change process, this approach ensures stakeholder interests are reflected in decision-making and that feedback actively shapes outcomes.

To foster collaboration and alignment, RECCo has established dedicated steering committees, working groups, stakeholder advisory panels, and consumer forums. These platforms bring together industry and consumer representatives to discuss issues, align on service design, and proactively manage risks. This transparent, evidence-based engagement process builds trust, reinforces accountability, and aligns with Ofgem’s principles of good governance.

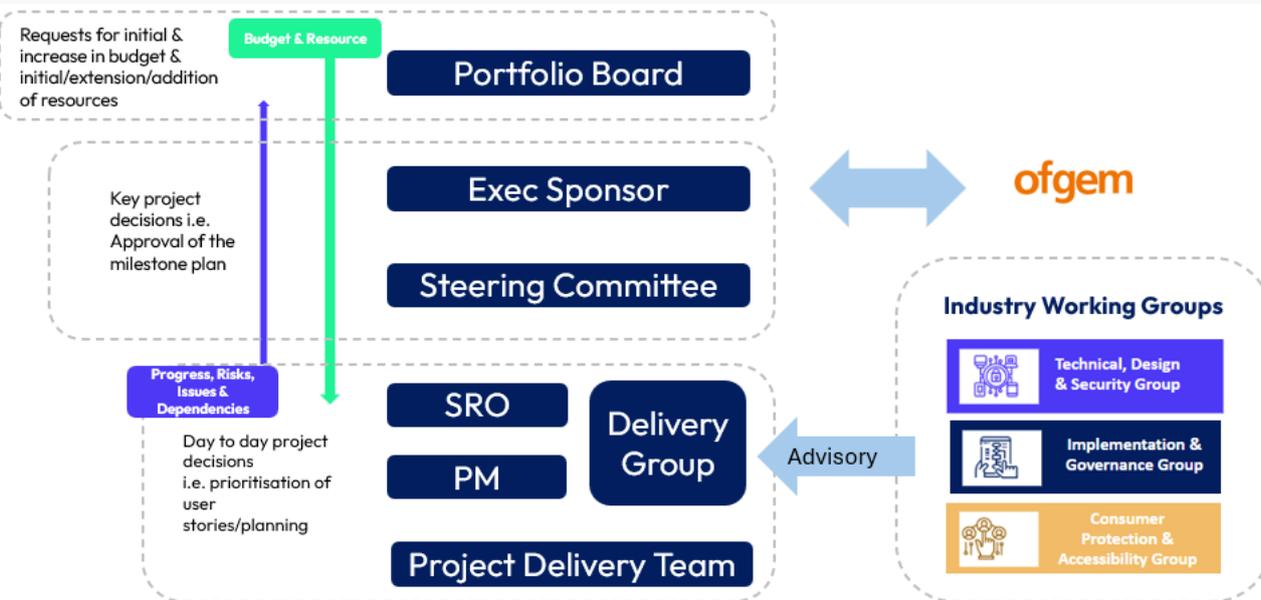


Consumer Consent Governance Forums, Focus/User Groups, and External Steering Committee

Consumer Consent Governance Structure



Consumer Consent Governance Bodies & Decision-Making Hierarchy



RECCo ensures transparency by publishing updates, decisions, and meeting outputs on accessible platforms, in alignment with Ofgem’s Data Best Practice principles. Clear documentation and communication regarding the proposed service and changes are provided, adhering to the REC Change Proposal process.

Approach to Governance Role

We plan to leverage the existing REC Change and Performance Assurance processes for delivery and ongoing service management. This approach minimises the burden on industry by avoiding the need to develop entirely new processes, saving time and costs.

Through our responsibility for governance, we will ensure that the service is aligned with relevant regulatory frameworks, particularly those concerning consumer data protection, security, and transparency. We will capture and implement the requirements relating to compliance, monitoring, and reporting, which RECCo is obligated to provide as part of the REC. We anticipate this will involve:

- Introduction of a new REC Schedule with performance-assured obligations.
- Updates to the Data Specification.
- Engagement with a broader and potentially new set of users and innovators beyond the current REC Parties.
- Consumer engagement during project delivery and indirectly during operation.
- Potential changes to the REC Charging regime, which may alter the commercial profile.

Approach to Delivery Body Role

As the delivery body, we will oversee procurement and technical solution management with a strong focus on stakeholder and consumer engagement. Key activities include:

- **Consumer Engagement & User Research:** Conducting user research to understand consumer journeys, define personas, and identify current and future needs, ensuring a consumer-centric approach.
- **Stakeholder Engagement:** Collaborating with industry and consumer focus groups to explore use cases, impacts, trust, scalability, security, costs, and benefits, integrating insights into the process.
- **Requirements Gathering:** Collecting detailed requirements, including epics and features, to align with stakeholder objectives and consumer needs. Building functional prototypes to test potential solutions and greater refine requirements.
- **User Experience Development:** Creating user experience standards to ensure a simple, intuitive, and consumer-friendly service.
- **Solution Identification:** Selecting the best solution for consumers, industry, and providers, focusing on MMP delivery, scalability for future needs, and interoperability where possible.
- **Feasibility Studies:** Evaluating potential partners and existing services to meet stakeholder and consumer expectations efficiently.
- **Procurement Strategy:** Defining a clear procurement strategy that incorporates stakeholder and consumer input for effective decision-making.
- **Sourcing & Resourcing Model:** Developing an optimal resource allocation model with stakeholder and consumer perspectives in mind.
- **Security & Controls Framework:** Establishing a robust security framework, including ICO engagement, to ensure compliance and address data protection concerns.
- **Service Partner Selection:** Choosing the most suitable partners for implementation, guided by consultation feedback and focused on building trust and confidence.
- **Delivery Approach & Model:** Utilising an Agile, iterative framework to integrate user feedback at every stage, ensuring adaptive improvements that align with consumer needs and expectations.

Delivery Methodology

RECCo is adopting an agile approach to developing the Consumer Consent Service, prioritising incremental, iterative delivery. This method enables manageable phases, earlier value delivery, and continuous improvement based on user feedback. It enables us to quickly adapt to evolving regulatory requirements, market changes, and user needs.

The benefits of this approach include:

- **User-Centred Design:** We will prioritise user needs, ensuring an intuitive service that meets the diverse requirements of all users, including those of vulnerable populations. Iterative development enables early feature testing and feedback to refine the user experience.
- **Risk Mitigation:** Incremental delivery identifies and addresses risks early, avoiding the pitfalls of large-scale deployments by releasing smaller, functional increments for testing and validation.
- **Faster Time to Value:** Each iteration delivers a functional product, allowing stakeholders to realise earlier benefits.
- **Regulatory Compliance & Adaptability:** Agile delivery integrates compliance checks with laws such as GDPR and adapts quickly to regulatory changes, ensuring the service remains both legally robust and responsive to market oversight.
- **Continuous Improvement & Innovation:** Iterative feedback loops drive refinement and innovation, integrating proven and emerging technologies and adapting to market trends such as increased smart meter coverage and dynamic pricing.
- **Product Roadmaps for Phased Delivery:** Progressing through Discovery, Alpha, Beta, and Live stages for each new feature, ensuring that every release delivers incremental consumer benefit, incorporates stakeholder feedback, and maintains compliance with evolving regulatory requirements.
- **Collaboration & Transparency:** Regular communication and stakeholder collaboration ensure goal alignment and accountability. Transparency fosters trust with stakeholders, including government and industry regulators.

Our approach better ensures the delivery of a secure, scalable, and user-friendly service that supports energy transition goals and fosters consumer trust.

Initially, we will focus on delivering the MMP, followed by iterative development, gradually building toward a comprehensive Consumer Consent Service that fulfils all agreed service requirements. Below is a brief overview of each phase.

Risk Management

The Programme Governance Framework incorporates a RAID (Risks, Assumptions, Issues, and Dependencies) Management Process to continuously monitor and address key elements throughout the programme lifecycle and into operational service delivery. This process ensures risks, assumptions, issues, and dependencies are effectively managed, supporting smoother delivery and the achievement of strategic objectives. Regular monitoring of a centralised RAID log, along with timely reporting and evaluation, ensures mitigation measures are implemented, constraints are addressed, and opportunities are maximised.

Key high-level risks are detailed in the appendix and will be expanded as we progress through the Consumer Consent Programme. While risks cannot be eliminated, active mitigation strategies aim to reduce their likelihood and impact. These risks are broadly categorised into design, delivery, compliance, security, user adoption, and scalability. Below is a summary of the key points:

- **Design & Delivery Timeline Risks:** Insufficient time to design the service, constrained industry resources, and challenges in delivering quality use cases. Risk also includes insufficient time or impetus for data users and data providers to build in the required integrations to meet the MMP timescale.

Mitigation: Adopt agile, iterative delivery; validate designs with prototypes and user feedback; and align timelines with industry input.

- **Data Quality & Provisioning Risks:** Poor data quality or uncertainty over data providers for the MMP.
Mitigation: Establish standards, conduct early stakeholder engagement, and use the REC Change process for alignment.
- **Security & Privacy Risks:** Vulnerabilities from third-party vendors, non-compliance with data regulations, and unauthorised access to consumer data.
Mitigation: Implement stringent security frameworks, ensure GDPR compliance, and conduct regular testing to address potential breaches and vulnerabilities.
- **User Adoption & Accessibility Risks:** Low adoption due to unclear use cases, lack of inclusivity, or misaligned solutions.
Mitigation: Engage consumer advocacy groups, test prototypes with users (including vulnerable groups), and incorporate feedback into iterative improvements.
- **Scalability & System Performance Risks:** Inability to scale efficiently with rapid user growth, leading to system outages.
Mitigation: Design for scalability, implement rate limiting, and maintain governance trust through transparency.
- **Financial Oversight & Value Risks:** Overspending or low adoption leading to limited benefits.
Mitigation: Create a detailed Business Case through the REC Change process, resource plans, and delivery models, and engage users early to ensure the service delivers value incrementally.
- **Capacity:** Risks pertaining to internal and external resources being constrained or unavailable.
Mitigation: Resource management within the project alongside an iterative and collaborative team approach to delivery, meaning support is in place for all team members. Engagement with industry partners and Ofgem to ensure the resources we need are kept engaged and inputting as needed.

The mitigation strategies emphasise proactive stakeholder engagement, iterative development, robust security, and careful financial and resource planning to address risks effectively.

Commercial Case

Commercial Summary

The Consumer Consent Service aims to deliver value for money by balancing cost-effectiveness, quality, and sustainability. Key capabilities include product design, user experience, data governance, and security, refined through stakeholder feedback and alignment with regulatory requirements.

RECCo employs an intelligent sourcing approach, evaluating external and in-house options to maximise efficiency and transparency. Performance is measured through KPIs, CBA, and user feedback. Ensuring compliance with industry standards and fostering stakeholder collaboration are central to the programme's success. This approach will best meet regulatory goals, empower consumers, and build trust in the energy sector.

Initial View of Service Capability Requirements

Initially, our insights came from Ofgem consultations, responses, ICO [regulations](#), publications (e.g., the [Energy Digitalisation Taskforce Report](#)), and stakeholder meetings. These efforts enabled us to develop a high-level view of requirements, which we are expanding into more detailed capabilities. Since being appointed as the Delivery Body, we have engaged with a wide variety of stakeholders, including energy industry experts, consumer groups, technology companies, and those with experience of similar programmes in other industries or countries.

Capability Categories & Scope

- **Product & Service:** Defines the service's offerings for end-consumers and intermediaries.
- **User Experience:** Covers user interactions with the service, including consumers and intermediaries.
- **Data Architecture:** Details how data is defined, used, and shared within the service.
- **Data Governance:** Establishes policies and practices for managing data, including defining roles and responsibilities.
- **Solution Design & Delivery:** Outlines technology design requirements for the solution's ecosystem.
- **Security:** Specifies measures to ensure appropriate security across use cases.
- **Ways of Working:** Guides how the delivery programme should operate to ensure effective implementation.
- **Programme Governance:** Defines stakeholder engagement and decision-making processes for service delivery.
- **Ongoing Refinement:** These requirements will evolve as we engage further with stakeholders and conduct additional research, including the development and testing of our Functional Prototypes.

RECCo Strategy for Obtaining Capabilities

RECCo employs an intelligent sourcing strategy to ensure the development of services is entrusted to capable providers or organisations. When multiple options exist for obtaining a capability, the project team evaluate these options based on factors such as previous experience, capacity, capability, and cost. Recommendations are presented to the steering group for approval.

Options for capability development may include Procuring services, extending current services, in-house capability development, or placing obligations on REC Parties, such as data providers, to develop specific capabilities. A blended approach will likely be used to deliver the service's various components effectively.

For procurement, RECCo will adhere to its published Procurement Principles, ensuring transparency, fairness, efficiency, and accountability throughout the process. These principles foster trust, encourage competition, and maximise value for stakeholders and end consumers. This approach reflects our commitment to ethical conduct,

sustainability, regulatory compliance, and excellence in procurement practices. For more details, our Procurement Principles can be found [here](#).

Value for Money

Value for money means delivering the best possible outcomes at the lowest cost while maintaining quality, usability, and security. The Consumer Consent Service must meet regulatory and consumer requirements efficiently and effectively.

Ensuring Value for Money

1. Cost-Effectiveness

- a. **Efficient Resource Use:** Optimise technology and human resources to minimise costs.
- b. **Scalable Design:** Develop a system capable of handling growth without significant additional expense.

2. Quality Assurance

- a. **User-Centric Design:** Develop an accessible and user-friendly system for all, including vulnerable and digitally excluded users.
- b. **Security & Compliance:** Maintain adherence to security standards and regulatory requirements to build trust and avoid penalties.
- c. **External Assurance:** Engage independent organisation(s) for programme delivery assurance.

3. Sustainability

- a. **Future-Proofing:** Design for adaptability to future energy sector and regulatory changes.
- b. **Environmental Considerations:** Minimise energy consumption and resource usage to reduce the solution's environmental impact.

4. Stakeholder Engagement

- a. **Industry Collaboration:** Work with stakeholders to align the service with their needs, ensure interoperability with other sector initiatives, and leverage existing infrastructure.
- b. **Consumer Involvement:** Actively involve consumers to ensure the service meets their priorities and addresses their concerns effectively.

Demonstrating Value for Money

Demonstrating value for money will be achieved through all or a selection of the following approaches, depending on the final service and costs to implement them.

Performance Metrics

1. Key Performance Indicators (KPIs): Develop KPIs to evaluate cost savings, user satisfaction, and compliance.
2. Regular Reporting: Provide stakeholders with regular updates demonstrating how the service delivers value.

Cost-Benefit Analysis

1. Detailed Analysis: Conduct comprehensive assessments to quantify benefits against incurred costs.
2. Comparative Studies: Benchmark the service's performance against alternatives or previous systems.

User Feedback

1. Surveys & Interviews: Gather feedback from consumers and industry participants to assess satisfaction and identify opportunities for improvement.
2. Continuous Improvement: Use feedback to drive iterative enhancements to the service.

Regulatory Compliance

1. Adherence to Standards: Ensure compliance with regulations and industry standards, such as those set by Ofgem.
2. Accreditation: Obtain certifications to validate the service's security and quality.

Conclusion

To ensure value for money in the Consumer Consent Service for the Great Britain energy sector, focus on cost-effectiveness, quality assurance, sustainability, and stakeholder engagement. Value can be demonstrated through clear performance metrics, CBA, user feedback, and regulatory compliance. This approach will meet industry requirements while building consumer trust and satisfaction.

Financial Case

Financial Summary

Current cost estimates for the Consumer Consent Service anticipate a multi-year programme with iterative development cycles.

Anticipated project cost estimates are as follows:

- £6.2m: Delivery of MMP (2025–6: £1.7m, 2026–7: £3.9m, 2027–8: £0.5m).
- £2.0m: Enduring Service Delivery, Year 1.
- £0.9m: Additional annual requirement from Change Allowance for post-MMP project delivery.

NB: Cost estimates have been provided with the best information available at the time of writing. However, relatively high levels of cost uncertainty remain, given that the Consumer Consent Service remains in the Discovery & Design Phase and material procurement 'lots' have yet to be completed

RECCo identified six critical roles, including a Project Manager, Business Analyst, Product Owner, User Experience Lead, Data Protection Officer, and Service Manager, to support delivery and operation. All of these roles, except that of Service Manager, have been recruited during the financial year 2025–26. Robust financial governance has been established and will ensure budget control, compliance, transparency, and accountability through regular audits and escalation processes.

Estimating Budgets

Estimating costs in a programme that requires regulatory and detailed design consultations presents challenges, and these estimates may evolve over time. However, cost estimates have been developed based on the details provided in this Business Case and information gathered during the Mobilisation Phase of the project, through market testing and partner procurement, which have been completed. For resources not yet appointed, resource costs have been calculated using average market rates and the Consumer Consent Programme Milestone Plan, applying the agile delivery approach outlined earlier.

The programme commenced in May 2025 and is expected to span multiple years, progressing through iterative development cycles. Efforts will prioritise leveraging existing solutions where feasible and cost-effective. Additionally, existing REC processes will be adapted to include Consumer Consent requirements, facilitating cost savings and operational efficiencies.

Estimated Costs

Anticipated project cost estimates are as follows:

- £6.2m: Delivery of MMP (2025–6: £1.7m, 2026–7: £3.9m, 2027–8: £0.5m).
- £2.0m: Enduring Service Delivery, Year 1.
- £0.9m: Additional annual requirement from Change Allowance for post-MMP project delivery.

These costs are based on a series of assumptions as detailed below:

- Delivery costs are to the MMP stage, with further development funding established for later iterations, and subsequent user-led development will be funded by the REC Change Allowance.
- It is assumed that the financial estimates held in RECCo's Market Testing Procurement Report are accurate. In order to ensure prudence, all estimates have been taken from the higher end cases to counter optimism bias.

- Assumptions regarding timing of spend, for example, proximity to the end of each financial year, etc, are based on the best information available at the time of writing.
- Performance assurance costs, including independent assurance activities, are included.
- We have not included costs for wider consumer awareness or marketing of the solution, as no decision was consulted on or made regarding this aspect.

We have prepared detailed budgets to support these costs; however, we have not provided a breakdown between internal and external costs at this stage to ensure that we protect any competitive procurement activity. However, should any REC Party require further detail on the cost make-up, we will share that on a confidential basis to the extent it would not compromise the integrity of the procurement process.

Cost apportionment between different categories for project delivery in FY 2026–27 and FY 2027–28. To protect and maintain competitive tension, we have redacted the percentage cost allocation. This may be shared confidentially to REC Parties if requested.

Category	% Cost	Workstream Alignment from Management Section
Governance	[redacted]	Programme, Governance & Financial
REC Service	[redacted]	Regulatory & Service Delivery
Engagement	[redacted]	Stakeholder Engagement, User Research & Consumer Engagement
Solution Development	[redacted]	Security & Data Protection, Technology, Commercial
Total	100%	

Recruitment

Six roles have been identified as critical to service development, and five of these roles have been recruited during the Mobilisation Phase of the project. The Service Manager will join in FY 2026–27, in line with the new service going live.

1. **Project Manager:** A project manager is essential to achieving successful project outcomes. Utilising an internal project manager increases alignment with delivery goals and ensures continuity. This resource can also be deployed on future projects, maximising long-term value.
2. **Business Analyst:** Develop in-depth knowledge of the service requirements and their potential delivery methods. Retaining this knowledge is essential for supporting the enduring service. Currently, RECCo employs a single Business Analyst, allowing this analyst to transition to other projects and reduce reliance on external consultants.
3. **Product Owner:** The Product Owner will play a crucial role in engaging stakeholders to drive continuous improvement of the service. This responsibility is vital both during project delivery and throughout the ongoing operation of the enduring service.
4. **Solution Architect:** A deep understanding of the solution's technical architecture is essential for driving change and holding service providers accountable. Retaining this expertise internally ensures consistent oversight and effective management of the solution.
5. **Data Protection Officer:** As responsibilities increase, RECCo must ensure data protection activities are effectively managed. Strengthening existing information security and data protection capabilities is the most effective way to achieve this.

6. **Service Manager:** Collaborating closely with the Product Owner, the Service Manager will oversee provider performance and ensure the service operates as intended, meeting stakeholder expectations and delivering consistent value.

Financial Governance of Costs

Programme governance has been established to ensure strict control over the approved budget. Expenditures are being closely monitored against the budget, with any deviations reported to the necessary body. Predefined threshold limits have been established, and any costs exceeding these limits will be reported and escalated through a designated process. Escalation of unresolved issues, significant risks, or threshold breaches would ultimately be referred to Ofgem as the Governing Body if necessary.

Regular audits and assurance checks will be conducted to confirm that budget management aligns with policies, regulations, and best practices. These reviews will validate that all programme spending follows the approved process, providing independent oversight of financial data and forecasts. This approach ensures accountability, transparency, and robust financial control throughout the programme.

Appendix

Risk & Mitigation Log

Risks listed below have high and moderate current risk scores.

Risk Title	Risk Description	Impact if not Resolved	Mitigation
ID&V accreditation design threat	There is a risk RECCo determines (based on legal advice) that the existing industry ID&V / accreditation arrangements are insufficient and cannot be relied on, resulting in additional onboarding activities for Consumer Consent Service users and potential industry push back	<ol style="list-style-type: none"> 1. Industry push back on REC Proposals, delaying delivery 2. Data users and data providers refusing to onboard to the solution on a voluntary basis 	<ol style="list-style-type: none"> 1. Engagement with Ofgem / DESNZ on expected ID&V / accreditation arrangements to get a view on whether they believe existing approaches are sufficient
Third-party data user & provider readiness for MMP Threat	There is a risk that data users and data providers do not have capacity or do not prioritise the integrations work needed to connect into the MMP	<ol style="list-style-type: none"> 1. The MMP does not go live, leading to cost, reputation, and adoption impacts 2. The MMP goes live with low number of users and impact's ability to demonstrate value to other parties and consumers 	<ol style="list-style-type: none"> 1. Early sight of critical path, indicating time where RECCo believe third parties have enough data to build their solutions 2. Working group and wider industry engagement, showing progress, thinking, direction of travel, etc. as early as possible 3. Leveraging existing technologies and keeping complexity as low as possible for easier adoption
Cyber threat	There is a risk that failing to respond effectively to cyberattacks, breaches, or system failures could exacerbate the damage and lead to regulatory penalties	<ol style="list-style-type: none"> 1. There is a serious security breach to the Consumer Consent mechanism leading to a severe impact to RECCo's reputation 2. The security breach could impact third party interfaces 3. The security breach could impact industry systems 	<ol style="list-style-type: none"> 1. Implement relevant cybersecurity controls / standards framework 2. Carry out pen testing within the Delivery Phase pre-MMP to understand any weakness and implement remediation and action plan

		<p>4. The security breach could impact consumers</p>	<p>3. Identify appropriate monitoring options and arrangements with the Technology Provider(s)</p> <p>4. Agree appropriate monitoring arrangements with the Smart Energy Code Panel Security Sub-Committee</p> <p>5. Vulnerability monitoring and testing</p> <p>6. Develop and test business continuity plans</p>
<p>System security third party threat</p>	<p>There is a risk that where the system relies on third-party providers for hosting, security, or analytics, those vendors could introduce vulnerabilities and / or become a weak point in security (e.g., through inadequate security practices or data controls affecting the passing of data between data users and data providers)</p>	<p>1. There is a serious security breach to the Consumer Consent Service, resulting in unauthorised access / data breaches</p> <p>2. Data breach impacts (per R004 & R005)</p>	<p>1. Engage with the Technical Design & Security Working Group to ensure relevant standards are understood and articulated</p> <p>2. Incorporate relevant standards into technical / design requirements</p> <p>3. Procure technology solution in line with defined technical / design requirements (including requirements regarding evidence of compliance)</p> <p>4. Develop and implement test strategy, including vulnerability and pen testing</p> <p>5. Determine and implement auditing controls and rules / responses (SLAs)</p> <p>6. Design and embed incident reporting framework / policy and procedures</p>

<p>API security threat</p>	<p>There is a risk that if APIs are improperly secured, attackers could gain unauthorised access to the system, manipulate consent records, or exfiltrate sensitive data</p>	<ol style="list-style-type: none"> 1. Severe impact to RECCo’s reputation and trust with stakeholders 2. Energy suppliers, service providers, and other stakeholders are unable to exchange data between themselves based on consumer consent 3. Energy suppliers, service providers, and other stakeholders exchange data between themselves that has been manipulated and caused reputation risk and trust on consumers 	<ol style="list-style-type: none"> 1. Incorporate relevant standards into technical / design requirements 2. Include encryption, multi-factor authentication 3. Implement Monitoring and Alerts on to analyse the APIs to detect patterns and errors 4. REC obligation on REC Parties 5. Performance Assurance Model 6. Develop and implement appropriate test strategy
<p>Data loss threat</p>	<p>There is a risk that unintended data loss during transfers, migrations, or system updates could result in incomplete records</p>	<ol style="list-style-type: none"> 1. This could result in consumer data being shared without consent and revoking consent not managed 	<ol style="list-style-type: none"> 1. Design and implement appropriate encryption standards for data in transition and at rest 2. Exit strategy when migrating data, including suitable back up procedures
<p>Data standards threat</p>	<p>There is a risk that different energy companies, brokers, or other third parties might use varying data formats and protocols, which can lead to failures in interoperability</p>	<ol style="list-style-type: none"> 1. This can create significant interoperability challenges, potentially leading to communication failures, data inconsistencies, and processing errors across systems and well as inconsistencies compromise in data integrity and leading to potential decision-making errors 	<ol style="list-style-type: none"> 1. Include vulnerable consumers in focus groups and test wireframes and prototype solutions with them to enable them 2. Partner with charities and consumer bodies; use their knowledge and test within their services 3. Systems need to be designed to ensure accessibility and inclusivity, particularly for those with limited digital access / language barriers
<p>Vulnerable user access threat</p>	<p>There is a risk that vulnerable consumers aren’t able to use the system if the solution excludes groups and does not provide the means for consumers to get</p>	<ol style="list-style-type: none"> 1. Loss of trust and transparency by impacted consumers, especially vulnerable groups, as our principles state the Consumer Consent Service and Delivery Body are to be consumer focused 	<ol style="list-style-type: none"> 1. Consider cost recovery mechanisms and cost models (e.g., pay-upfront subscriptions / usage limitations, such as API calls / download limits) 2. Codify agreements / usage terms into the REC

	help when they need it (including digital exclusion, socio economic and language barriers)		3. Incorporate into requirements and testing
RECCo credit risk threat	There is a risk that RECCo will take on a credit risk through additional third parties using its services, and would introduce the risk of non-payment for services	1. RECCo would incur costs that it cannot recover from third parties who have used its services	1. Use wireframes and prototypes to validate and verify the solution with users as soon as practical
Change Proposal Threat	There is a risk that the solution will require a number of Change Proposals	1. There could be delays in the Change Proposals being approved and implemented, which could impact the timeline for the MMP release and future iterative releases	
Implementation cost / budget threat	There is a risk spend may be different to budget / total cost due to timing differences, system design, and enduring delivery costs	<ol style="list-style-type: none"> 1. This could delay the delivery of the MMP and the iterative approach to delivering the Consumer Consent Service and future initiatives release; this could impact our reputation in the industry 2. Major changes to solution will impact implementation and enduring delivery costs 	<ol style="list-style-type: none"> 1. The Impact Assessment has conservative cost figures, including a low-high range, mitigating the risk of exceeding it 2. Project accountancy: monthly budget forecasting embedded and quarterly reviews (minimum) of future-year budgets 3. Functional prototypes to help improve understanding of tech and costs alongside Masons Market Testing and a Procurement Report to give confidence in budget forecasts
Critical path governance / code changes threat	There is a risk that if governance / code changes needed for the solution take longer than estimated	1. The MMP does not go live on time leading to cost, reputation, and adoption impacts	1. Following discussions between RECCo and Ofgem, we've agreed this will not constitute a Significant Code Review and we will need to run separate and sequential consultations for REC Drafting and REC Change Proposal. This linear path suggests the REC CP decision completing in January 2027.



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