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Annex G - Implementation Timeline

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Consultation questions

Q15: Do you have any comments on the overall implementation approach and timeline set out in this annex, including the implementation date of 01 January 2027?

Q16: Do you have any comments on the high-level test and assurance approach set out in paragraphs 25 - 31?

Q17: Do you consider that an implementation working group should be established to support technical discussions on testing artefacts, defects and proposed design changes? If yes, please provide any additional information on the scope and membership of this group as well as when it should be established.

Q18: Please confirm if you would be interested in voluntary participation in end-to-end testing as either a Supplier or RTI User. While we have proposed an obligation on Suppliers to support implementation through end-to-end testing in the REC TI



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Arrangements Schedule (see paragraph 1.5(d) in Annex D), our preference is to work with a small number of volunteer Suppliers.

Introduction

1. This section sets out the activities that will take place between the commencement of the consultation period, through to the Tariff Interoperability (TI) Arrangements going live in January 2027. A summary table with key dates is provided at the end of this annex for ease of reference.
2. In summary, these activities include:
 - Review of consultation responses, issuing a response to the consultation, and introduction of the proposed Retail Energy Code (REC) and Electricity Supply Standard Licence Condition (SLC) drafting;
 - Ongoing maintenance of the TI Application Programming Interface (API) Technical Specification during the implementation phase;
 - Additional consequential changes to the REC to cover performance assurance and funding arrangements;
 - Testing activities including participant testing and end-to-end testing of the overall solution;
 - Onboarding Suppliers and RTI Users¹ and establishment of data within the TI Register;
 - Go-live expectations and early life support.
3. For the avoidance of doubt, all dates are indicative and remain subject to the outcome of this consultation and other dependencies.

During the consultation period

4. To support industry review of the consultation documentation, a webinar will be held shortly after publication. This webinar will be open to all interested stakeholders and will be communicated to stakeholders through the usual

¹ Further information on TI User and RTI User is set out in Annex B – Policy Overview.



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communication channels, e.g. newsletters and bulletins. Any organisation wishing to be added to the TI distribution list should contact

tariffinteroperability@retailenergycode.co.uk.

5. The webinar will provide a general overview of the TI Arrangements and allow for any clarification questions to be raised by industry parties, ensuring that feedback received through consultation responses is specific, targeted and relevant to the desired policy outcomes for TI.
6. During the consultation period, we will engage with industry through the Tariff Interoperability Working Group (TIWG); holding meetings on a monthly basis to discuss implementation considerations. Any consultation issues identified through these discussions, resulting in the need for clarifications to be provided, will be shared with the wider industry via existing REC communication means e.g. the REC Issues Group, weekly REC Change Bulletins and weekly REC News Bulletin (which can be subscribed to on the REC Portal).

Responding to consultation responses

7. Following closure of this consultation, we will analyse the responses to the consultation and where additional clarification on the content of the response is required, we will reach out to stakeholders on a bilateral basis to hold further discussions.
8. Following initial review of the responses by RECCo and DESNZ, we may consult with the TIWG on our position regarding specific feedback.
9. A formal response document, confirming the final agreed position, will be developed by DESNZ and RECCo and published alongside formal introduction of the proposed SLC and REC drafting.

Implementing new Electricity Supply Standard Licence Condition (SLC)



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10. Following review of consultation responses by DESNZ, we propose to introduce a new SLC 'Making available information related to Charges for the Supply of Electricity' into the Electricity Supply Licence on 31 March 2026.
11. The new SLC is proposed to have effect from 01 January 2027.
12. We consider that introducing the new SLC on 31 March 2026 provides clarity to Suppliers on the obligations that will be in place from January 2027. This will allow Suppliers to prioritise and plan accordingly.
13. Implementing the new SLC at the same time as the new REC TI Arrangements Schedule (see below) also provides a mechanism for this REC Schedule to cross reference the definitions used in the SLC on which Electricity Suppliers are required to comply with the TI arrangements.

Changes to the REC Schedules

14. The new REC TI Arrangements Schedule (including the template User Agreement) and the new definitions to be included in REC Schedule 1 (Interpretations and Definitions) will, subject to the outcome of the consultation, be introduced as part of the REC by DESNZ on 31 March 2026. At this point, the new REC Schedule and changes to existing REC Schedule 1 (Interpretations and Definitions) will form part of the REC baseline and will be subject to the standard REC change process.

New REC TI API Technical Specification and changes to the EMDS

15. It is our position that the TI API Technical Specification and the associated changes to the Energy Market Data Specification (EMDS), i.e. the Data Item Catalogue, REC Market Message Catalogues and Standards Definition Document, should not form part of the initial, formal changes to the REC, and should instead be baselined and published on the REC Portal to enable Suppliers and TI Users to commence development of their own solutions.



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16. The new REC TI Arrangements Schedule (included in Annex D) requires Suppliers to build and test their individual solutions using this baselined version of the TI API Technical Specification.
17. During the transition period (from introduction of the new REC TI Arrangements Schedule on 31 March 2026 until go-live in January 2027), we propose to use the TI governance arrangements to capture and discuss any required changes to the baselined TI API Technical Specification that are identified through design, build and test activities. We will set out the approach for managing changes to this baseline following review with TIWG. Information on the approach will be published on the REC Portal for transparency.
18. To support the integrity of the design, build and test activity, the scope of changes to the TI API Technical Specification will be limited to design defects that would otherwise block or delay go-live or compromise outcomes for consumers once the arrangements have become operational. They are not intended to facilitate material change to the design.
19. Proposed changes will be visible to industry participants, with the TIWG used to consider and make recommendations on approval / rejection of each change. Any changes to the baseline would be approved by DESNZ. We propose to establish a lower-level implementation working group to support technical discussions on testing artefacts, defects and proposed design changes.
20. We believe that this approach offers the greatest level of adaptability to ensure any critical changes to the TI API Technical Specification identified during testing can be applied in a timely manner.
21. At a point in time prior to go-live in January 2027 (see indicative date below) we will declare a change freeze against the baselined TI API Technical Specification and the associated Energy Market Data Specification artefacts, where no further changes will be allowed. This will ensure a stable position is in place for the final implementation of the new functionality.



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22. Following the change freeze, DESNZ will undertake a short consultation (c. 4 weeks) on the latest version of TI API Technical Specification and the associated Energy Market Data Specification artefacts, before introducing these artefacts into the REC. It is currently expected that the change freeze will occur in October 2026, and final artefacts will be introduced into the REC in November 2026. These dates will be further refined with TIWG.

Additional consequential changes to the REC

23. The REC Performance Assurance Reporting Catalogue (PARC) will be updated to reflect new reporting requirements for Suppliers given their crucial role in supporting the TI arrangements. The PARC is part of the REC baseline, and we propose to update it using the existing REC change management process². We expect to develop the detailed reporting proposals over the coming months, in discussion with TIWG. RECCo will then raise a REC Change Proposal in Q1 2026. When progressing this change, we will take into account the timescales needed by Suppliers and RECCo to build, test and implement the new reporting requirements.

24. It is not RECCo's intention to create a specific TI charge for RTI Users. However, future circumstances (e.g. service expansion, market conditions etc) may require a charge. RECCo must ensure that any such charges are cost reflective. To facilitate charging, should this become applicable in the future, RECCo will amend the REC Charging Methodology and REC Charging Statement using the existing REC change management process. RECCo will raise a REC Change Proposal to reflect the TI arrangements, and the zero charge for RTI Users at commencement, during early 2026. The REC change process allows for non-REC Parties such as RTI Users and potential RTI Users to engage and provide consultation responses for consideration. RECCo will proactively engage with

²



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potential RTI Users when the changes to the charging arrangements are progressed, so that they have the opportunity to contribute.

Implementation Testing Approach

25. The timeline set out within this consultation provides for a nine-month period from the formal decision to implement the changes to REC Schedules on 31 March 2026, through to the go-live date in January 2027. During this implementation period, Suppliers and TI Users will build and test their solutions. In addition, RECCo will build the central functionality to support the TI Arrangements e.g. the TI Register and the monitoring and reporting capabilities.
26. To provide assurance that the full end-to-end solution design works in practice, it is proposed that a period of end-to-end testing is included within the implementation period. This will require one or more Supplier(s) and RTI User(s) to onboard to the RECCo test environment to test the interactions with the TI Register and their ability to share tariff pricing data and issue/receive event notifications.
27. To ensure that this testing is effective, we are seeking Suppliers and organisations wishing to become RTI Users to volunteer to participate in testing. If any organisation would like to volunteer to support end-to-end testing, please confirm as part of your consultation response. It should be noted that the draft REC TI Arrangements Schedule places an obligation on Suppliers to participate in testing where required by RECCo. If we do not have a sufficient number of volunteers, testing may be mandated.
28. In addition to this central testing, we propose to make a sandbox environment available to allow Suppliers, TI Users and RTI Users to test their own API builds against the TI Register test environment.
29. To support issue resolution during testing, we propose to establish an implementation working group. Further details of the scope and composition of this group will be discussed and agreed through TIWG. We welcome views, through this consultation, on the proposed high level testing approach set out in



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the paragraphs above, and the proposal to establish an implementation working group. This will feed into ongoing considerations regarding the governance and assurance requirements applicable to the implementation activities and specifically what assurances DESNZ and RECCo require from Suppliers to confirm readiness for go-live in January 2027 e.g. whether there will be a formal review of test completion or reliance on a management assertion from each Supplier.

30. An overall test approach, including the enduring testing arrangements, will be developed and published in due course. This will include a detailed test approach and plan with additional detail regarding test environments, test scenarios and test data to facilitate testing activities. This will be discussed and refined through TIWG.
31. RECCo is not currently planning to provide Supplier, TI User or RTI User test stubs (e.g. simulators/dummy recipients) or the RECCo monitoring tool to support individual party testing and development of their API solutions. This will be discussed further and agreed with TIWG as part of the overall testing approach.

Onboarding Supplier and RTI Users

32. The proposed approach, set out in the draft REC TI Arrangements Schedule, is that Suppliers will be required to provide their API endpoint and contact details to RECCo by 30 November 2026. This will enable RECCo to populate the TI Supplier Register with the required information to support implementation for January 2027.
33. When providing API endpoint and contact data, Suppliers will be provided with security credentials enabling access to the restricted area of TI User Register. Additional guidance will be provided in relation to the use of the TI Register during the implementation phase.
34. When the SLCs become effective in January 2027, all Suppliers mandated through their Electricity Supply Licence must be in a position to share tariff



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pricing data and issue event notifications in accordance with the REC. There will be no formal phasing in of REC obligations. As noted above, RECCo will assure that Suppliers have met their implementation requirements for go-live.

35. From a TI User perspective, TI User will be able to access public tariff pricing data from the go-live date without needing to register or engage with RECCo. Organisations wishing to become RTI Users and access consumer specific tariff information will need to undertake onboarding activities, including signing a User Agreement, provide technical information to facilitate receipt of event notifications from Suppliers, provide contact information, and be added to the TI User Register.
36. Onboarding of RTI Users will commence ahead of go-live. Our initial view is that it should start from December 2026, and it will then continue throughout January 2027 onwards. There is no requirement for RTI Users to onboard by a specific date as this is an enduring process with new users registering at any point.

Go-Live and Early Life Support

37. From January 2027, RECCo will provide a two-month period of hyper care through dedicated surgeries.
38. Stakeholders operating under the new arrangements will be invited to attend these surgeries and provide feedback to inform a lessons learnt exercise.

Ongoing Stakeholder Engagement

39. During the implementation phase, RECCo will continue to hold regular TIWG meetings and run a structured triage and change management process for issues raised during industry testing activities. As noted above, further information will be provided on the approach for managing change to the baselined TI API Technical Specification from 31 March 2026, following review with TIWG.
40. In addition, we will put in place mechanisms to support wider industry engagement with guidance and FAQs published on the REC Portal. We will



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continue to develop our stakeholder engagement strategy so that Suppliers and potential TI Users are kept informed of important updates, for example in relation to testing, delivery plan and changes to the TI API Technical Specification baseline. Any organisation wishing to be added to the TI distribution list should contact tariffinteroperability@retailenergycode.co.uk.

41. RECCo will support bilateral discussions with participants and hold design surgeries where required to support onboarding activities and error resolution. Further information on how organisations can engage in these activities will be shared by RECCo in due course.

Summary of Timeline

42. The table below provides a summary of the key activities set out within this Annex.

Timescale	Activity
Nov – Dec 2025	Industry consultation.
Jan – March 2026	Review consultation responses and develop detailed implementation approach in discussion with TIWG (including test approach and plan)
Jan – March 2026	Raise consequential changes to the REC covering Performance Assurance Reporting Catalogue (Suppliers) and Charging Methodology and Charging Statement (RTI Users). These will be progressed via the standard REC change management process.
31 March 2026	The following artefacts approved: <ul style="list-style-type: none"> • New Electricity Supply SLC approved with an effective from date of January 2027. • New REC TI Arrangements Schedule included within the REC baseline. • Updated REC Schedule 1 with new TI related definitions included within the REC baseline.



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	<ul style="list-style-type: none"> TI API Technical Specification and associated EMDS changes (REC Data Item Catalogue, REC Market Message Catalogue and Standards Definition Document) baselined.
Q2 2026	Supplier, TI User and RECCo build and test activities commence.
Q3 2026	End-to-end testing of TI solution. Any changes to the TI API Technical Specification baseline are reviewed with TIWG and approved by DESNZ as described in a published change management approach (to be developed in discussion with TIWG).
October 2026	Change freeze in place where no further changes to the TI API Technical Specification will be allowed. DESNZ issue a final consultation on the TI API Technical Specification and associated changes to the EMDS.
November 2026	TI API Technical Specification and associated EMDS changes introduced into the REC. Suppliers commence onboarding e.g. provide endpoint and contact information to RECCo.
30 November 2026	Cut off for Suppliers to provide endpoint and contact information. RECCo will escalate any non-compliant Suppliers through the existing performance assurance mechanisms.
Nov-Dec 2026	Suppliers to provide confirmation of readiness for go-live. Approach TBC.
December 2026	Organisations wishing to become RTI Users can initiate registration and onboarding activities ahead of January 2027 go live.



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January 2027	Go-live of the TI Arrangements. All Suppliers, required by their Electricity Supply Licence to do so, must be in a position to share tariff pricing data and issue event notifications in accordance with the REC Schedule.
Jan – Feb 2027	Hypercare period with additional support in place to facilitate issue resolution.