

A vertical blue bar on the left side of the page.

THI Consultation Response Form **Consumer Consent Solution (CCS)** **Design Consultation**

Published 11 February 2026
Response Deadline 25 March 2026

Link to the Consultation

[View the Consumer Consent Solution Design Consultation here.](#)

How to Respond

Please complete this document and send your responses to consumerconsent@retailenergycode.co.uk

Where possible, we kindly request that responses are submitted as a Word (.docx) document.

Please be assured that your responses will not be edited or amended in any way.

We've asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

We will publish non-confidential responses on our website at <https://retailenergycode.co.uk/consultations/>

Your response, data and confidentiality

Responses can be submitted in one of three ways:

- **Non-confidential** – the full response along with the submitting organisation's name and category will be published; or
- **Confidential** – responses will only be shared with RECCo and its CCS project team, the REC Code Manager and the Authority (where relevant). We will respect this request for confidentiality, subject to any obligations upon us to disclose information. Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or
- **Anonymous** – the full response will be published, but the submitting organisation's name will be omitted (the organisation category will still be published). Details of the response may be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation, and the organisation name will be shared with RECCo and its CCS project team, the REC Code Manager, and the Authority (where relevant).

If you submit a non-confidential response but wish to keep part of your response confidential or anonymous, please clearly mark those sections as "confidential" or "anonymous" as appropriate.

All responses will be treated as non-confidential unless otherwise indicated.

RECCo recommends submitting only financial or commercially sensitive information as confidential, and using anonymous for other cases where the submitting organisation does not wish to be identified. This approach ensures that response details can be included in any consultation summary report(s) and that RECCo's comments on the responses can be published.

Respondent Details

NAME	Yumann Siddiq
ORGANISATION	Ohme
ORGANISATION CATEGORY	Third Party Intermediary (TPI)
E-MAIL ADDRESS	Yumann.siddiq@ohme-ev.com
RESPONSE CONFIDENTIALITY	Non-confidential (recommended)

Questions

Scope of the CCS

Q1	Do you agree with the proposed MMP scope, including the core functional components and the inclusion of SEC Other Users and the BSC SDR?
	<p>Ohme broadly agrees with the proposed MMP scope. As consent to sharing of smart meter data is the first use case for the consumer consent solution (CCS), inclusion of SEC Other Users and Elexon’s SDR is appropriate. We note that the SDR may not be available at MMP go-live in March 2027 and could be implemented as late as 2028. RECCo should provide clarity on the sequencing and confirm how ATPs that are dependent on the SDR route should plan their implementation accordingly.</p> <p>Likewise, while it is positive to see other programmes that will be dependent on consumer consent in the CCS roadmap, we urge further clarity on interaction with these programmes to ensure alignment and avoid duplication of effort for market participants engaged across multiple initiatives.</p>
Q2	Do you have any comments on the assumption that SEC Other Users would not need to migrate existing consents to the CCS and would instead move to using the CCS as existing consents are renewed?
	<p>We broadly support this assumption as a pragmatic route to reducing duplication of existing consents. RECCo should clarify the process by which existing SEC Other User consents, once expired, will be renewed through the CCS, especially if current Other User consent does not require aligned identity verification (IDV).</p>

REC Policy Positions

<p>Q3</p>	<p>Do you agree with the position that consent for access to half-hourly metered data should be provided by the occupier rather than the bill payer, where these are different individuals? If not, please provide your rationale.</p>
<p>In principle, we agree that where the bill payer does not reside at the property, the occupant is the data subject whose data is being shared and is therefore the consenting party. However, we ask RECCo to further explore and test the practical implications and potential solutions to the challenge of granting consent in multi-occupancy settings with a broad range of ATPs before concluding any route – with priority on least friction.</p>	
<p>Q4</p>	<p>Do you agree with the position that for multi-occupancy households, a ‘lead occupant’ may provide consent on behalf of other occupants only where they confirm they have the authority to do so and have obtained agreement from all other adult occupants? If not, please provide your rationale.</p>
<p>No, while Ohme understands the rationale for the lead occupant model, without further clarity and assurance, we do not agree with this position as it currently stands. We urge clarity on:</p> <ul style="list-style-type: none"> • Self-verification and liability: The model relies on self-declaration by the lead occupant. While we do not advocate for any additional verification steps at this stage, we require assurance from RECCo that ATPs will not face liability where a consumer has inaccurately self-declared as lead occupant. ATPs should be able to rely on the CCS-recorded consent and be insulated from liability where consent was obtained in good faith through the CCS process. We note that paragraph 7.24 of the consultation envisages ATPs assisting with dispute resolution – while we can assist, this should not extend to bearing liability for the accuracy of lead occupant declarations. • Automatic termination upon dispute: The proposal to automatically terminate consent and suspend data access upon a dispute raised by another individual against a consent record could cause operational issues for ATPs delivering active and ongoing flexibility services, disrupting consumer experience with commercial consequences. We strongly recommend the introduction of a short investigation period before automatic termination takes effect, allowing the ATP to validate the consent record before services are suspended. • Data aggregation and anonymisation: Likewise, we question the point at which smart meter data across multiple occupants becomes sufficiently aggregated and no longer ‘personal data’. We understand that the drive to auto-terminate consent and data access upon dispute is due to the requirement for personal data to be held with only ‘clear and unambiguous’ consent under GDPR. We urge further consideration on where smart meter data should be classified as personal data when it relates to more than one person within the household and revision of the auto-termination provision as above. • Consumer experience guidelines: We urge RECCo to ensure that the CEGs do not introduce friction for single-occupancy scenarios as a consequence of designing for multi-occupancy complexity. The two scenarios should be handled distinctly in guidance. 	
<p>Q5</p>	<p>Do you agree with the proposed approach and standard for identity verification? <i>If not, please provide your rationale.</i></p>

Ohme has significant concerns about the practical implications of the proposed photo ID-based IDV approach on consumer onboarding journeys, as follows:

- **Friction and drop-off risk:** The proposed journey involves two redirection steps - firstly to the CCS portal and then to a third-party photo IDV service. Each redirection introduces friction and materially increases the risk of consumer drop-off. For Ohme, this is of particular concern because consumers have already purchased and installed their chargepoint before reaching the consent step. Any drop-off at this stage risks the consumer's participation in flexibility services and our ability to recover associated costs.
- **Embedded IDV:** We urge RECCo to explore whether photo IDV can be embedded within the CCS portal rather than requiring an additional redirect. We understand that some IDV providers may offer SDK or embedded integration options and encourage RECCo to prioritise this approach in its procurement.
- **Federated and delegated IDV:** Paragraph 5.18 of the consultation notes that in future, the CCS may be able to rely on IDV checks carried out by ATPs where these have met the minimum threshold. Ohme strongly supports earlier adoption of this federated or delegated IDV model. We urge RECCo to accelerate consideration of this option and to engage with ATPs on the standards that their existing IDV processes would need to meet in order to qualify.
- **Reverification:** We ask RECCo to confirm that, where a consumer has a CCS account and has previously been verified and matched to their MPAN, subsequent consent grants can be completed with minimal re-verification, as described in paragraph 5.24 of the consultation.

Q6

Do you agree with the position that consumers should have the option to establish an account with the CCS or grant consent via the 'guest' approach?
If not, please provide your rationale.

We support this dual approach in principle, but request further clarity on its application in practice. As our app is the primary interface through which consumers interact with their chargepoint and manage their energy services, our customers will not want to be redirected to create a separate account on an unfamiliar CCS platform as part of that experience. The guest approach is therefore well-suited to existing ATP onboarding flows.

However, we request further clarity on the practical distinction between the guest and account approaches when both require photo IDV, while the guest approach will presumably offer fewer benefits, e.g. no audit trail of consent actions. If the distinctions are narrow and the guest approach requires photo-IDV regardless, we urge RECCo to consider how the guest IDV can be carried forward, even without a formal CCS account, to avoid repeated IDV prompts creating poor UX.

We also request that RECCo confirm how it intends to handle the consolidation of guest journey actions into a CCS account if a consumer subsequently decides to register, as referenced in paragraph 5.28 of the consultation.

Q7

Do you agree that consumers should have the option to revoke or renew consent directly with the relevant ATP or via their CCS account?
If not, please provide your rationale.

Yes - as above, the Ohme app is the primary interface for our customers and therefore it is appropriate that they can manage their consent preferences within the same environment they use to manage their chargepoint and its services. We support the proposed webhook mechanism for ATPs to notify the CCS of consent revocation or renewal events.

We urge RECCo to publish detailed technical specifications for webhook implementation as early as possible to allow ATPs sufficient time to build and test these integrations ahead of MMP go-live.

We also require assurance that consent revocation initiated via the CCS consumer portal will generate an immediate and reliable notification to the relevant ATP. The notification must be near real-time to allow ATPs to suspend operational activity without delay. Any significant lag between a consumer revoking consent on the CCS portal and the ATP being notified creates a period of risk during which data may continue to be accessed, or operational decisions made on the basis of revoked consent.

Q8

Do you agree with our position that EDPs should explicitly check that active consent is in place within the CCS each time they share data with an ATP?
If not, please provide your rationale.

Yes, we agree with this principle as a safeguard against data being shared after consent has been revoked. This is an important consumer protection measure.

However, we have concerns about the performance implications of the zero-trust introspection model for time-sensitive data flows. Flexibility services are time-sensitive and any latency introduced by the consent introspection step directly affects the responsiveness of such services. We request that RECCo set clear performance requirements for the introspection endpoint, including maximum response time SLAs and that these are reflected in the non-functional requirements for the CCS.

We also urge clarity on how the introspection model operates for EDPs that send data to ATPs on a scheduled or batch basis, rather than in response to individual ATP requests. Here, we question whether the introspection requirement applies at the point of each individual data provision event or whether an alternative approach, e.g. introspection once per session or per defined time window, might be appropriate.

Finally, we note that the dispute mechanism proposed in response to Q4 - which we recommend should include an investigation window before consent is automatically terminated, should be reflected in the introspection framework. If a consent is under active investigation, the introspection outcome should reflect that status clearly to avoid EDPs declining data requests during a dispute that may ultimately be resolved in favour of the ATP.

Q9

Do you agree that if the CCS is unavailable, the EDP should continue to share data unless the CCS outage extends for a significant period of time?
If not, please provide your rationale.

Yes, Ohme supports this proposal. Additionally, we do not agree with RECCo's characterisation that 'mission-critical services' will not use the CCS. Flexibility and demand-side response services are time-sensitive and even short interruptions to data access could have real commercial and operational consequences. In aggregate, these disruptions and consequences could impact the level of sustainable delivery and consumer buy-in required for delivering Government's ambitions in the Clean Flexibility Roadmap.

We therefore urge RECCo to clearly define 'significant period' in the REC drafting and suggest that the threshold for suspending data sharing during an outage should be proportionate to the operational dependency that ATP services have on continuous data access. We also request clear and detailed Business Continuity and Disaster Recovery arrangements to be published, so that ATPs and EDPs can plan accordingly.

Q10

Do you agree that the FAPI 2.0 standard should be adopted for the CCS, which includes use of mTLS for all data sharing?
If not, please provide your rationale.

Ohme recognises the benefits of adopting FAPI 2.0, but ask RECCo to confirm the specific cryptographic methods proposed under the FAPI 2.0 implementation and that these align with methods already in use by accredited organisations operating under ISO 27001 frameworks to minimise additional implementation burden.

Technical Design

Q11	Do you have any comments on the proposed overall solution architecture and the component descriptions?
<p>Ohme welcomes the overall architecture and supports the hybrid model that preserves decentralised data exchange between ATPs and EDPs, avoiding the need to route energy data through a central system.</p> <p>We support the centralised consent ledger as the authoritative record of consent, provided it is updated in near real-time when consent events occur via ATP-managed journeys. Any lag between a consent being recorded in an ATP's own systems and being reflected in the central ledger creates a window of risk in which an EDP might decline a data request on the basis of an apparently absent or stale consent record. We ask RECCo to specify latency requirements for ledger updates triggered by webhook notifications.</p> <p>We would also note that the proposed solution does not appear to address in detail what commercial or contractual information may be considered sensitive within the Directory and Registry.</p>	
Q12	Do you agree with the proposed approach to matching MPxN to the address? If not, please provide your rationale.
<p>We support use of the REL address for MPAN matching as this aligns with ECOES which many ATPs already use. We urge RECCo to prioritise securing the necessary licence extension from DCC and Ordnance Survey in time for MMP go-live.</p> <p>We caution against use of the Meter Point Location (MPL) address as the fall-back option as its inaccuracies are documented by Ofgem, Government and industry¹. Therefore, we urge RECCo to treat the REL licence extension as a dependency that must be resolved before MMP go-live, rather than a best-efforts aspiration.</p>	
Q13	Do you have any comments on the non-functional requirements detailed within Annex D?
<p>Click or tap here to enter text.</p>	
Q14	Do you have any comments on the split between centralised and decentralised elements of the overall solution outlined in Annex D?
<p>Ohme welcomes the decentralised approach to data exchange. This preserves the opportunity for direct bilateral relationships between ATPs and EDPs and avoids the cost and single-point-of-failure risk of routing all data through a central system.</p> <p>We are content with the centralised consent ledger model as the authoritative record of consent, provided the real-time update requirements noted in Q11 are met.</p>	

¹ [retail_energy_location_-_commentary_document_0.pdf](#)

Q15

Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E?

We note the following observations:

- **Figure 1 (IDV):** We are concerned about the number of redirections shown in the IDV flow. Each redirect step materially increases consumer drop-off rates. We urge RECCo to explore embedded or SDK-based IDV integration as an alternative or complement to the redirect model. We also note that the diagram does not show fallback or error handling paths for failed IDV, which should be included in any revised version.
- **Figure 2 (Consumer Consent Management):** The diagram does not explicitly show how notifications from the CCS reach the consumer when a consent is revoked or modified via the ATP webhook route. This requires clarification, as it has implications for ATPs' own customer communications obligation.
- **Figure 3 (Data Sharing Interactions):** As noted in our response to Q8, this diagram should be supplemented with performance requirements for the introspection step. We would also welcome the addition of an error path showing what happens when introspection fails, e.g. due to CCS unavailability - to confirm that the fallback behaviour described in the main consultation document is reflected in the technical design.

UX Design

<p>Q16</p>	<p>We have identified four groups of people who will use the consent system, each with different needs (Annex F – Behavioural Archetypes). Have we missed any important user groups? Are there any needs we haven't considered for any of these groups? If yes to either, please tell us what's missing and why it matters.</p>
<p>The four behavioural archetypes identified broadly capture the range of consumer engagement styles relevant to the CCS. However, we suggest that the "Comfortable Data Enthusiast" archetype may underrepresent the degree to which even technically confident consumers are sensitive to friction in app-based journeys. Even highly engaged customers will abandon consent flows that require more than two or three steps or that redirect them away from a familiar app environment.</p>	
<p>Q17</p>	<p>Do the proposed inclusion requirements adequately address the needs of vulnerable customers, digitally disadvantaged consumers, and consumers with limited English proficiency (Annex F – Accessibility and device constraints)? If not, what additional requirements should be included?</p>
<p>We have no specific additional requirements to propose at this stage, but note that the practicalities of providing assisted journeys that are genuinely equivalent - particularly for the consent grant step which requires photo IDV, will require careful design. We encourage RECCo to engage with ATPs on how assisted IDV journeys can be delivered in practice without creating disproportionate operational burden.</p>	
<p>Q18</p>	<p>Do you agree that consumers need to know who is requesting consent, what data they want, and for how long? If not, what's missing? Is there a risk of information overload?</p>
<p>Yes, Ohme agrees that consumers need to understand who is requesting consent, what data will be shared and for how long. We advocate for a layered information model: key facts - who, what, how long and the consumer benefit - presented upfront, with the option to access further detail for those who wish to explore it. Technical details about data access mechanisms should not be surfaced at the consent stage unless strictly necessary.</p> <p>As consumers are primarily motivated by understanding the benefit to them of sharing their data, rather than the technical details of how that access works, information overload risk arises when technical detail is presented at the consent stage rather than being made available on request.</p>	
<p>Q19</p>	<p>Where should additional verification steps or friction be introduced to protect consumers? Where might such steps create disproportionate barriers? (Refer to figures 7–10: User journey stage)</p>
<p>Additional verification steps could be justified at the point of initial consent grant where no prior CCS identity record exists or when a consumer's address details have changed. These represent genuine risk points where fraud or misuse is plausible.</p>	

However, friction becomes disproportionate when it is applied repeatedly to the same consumer for the same property and data access purpose. Requiring full photo IDV on each occasion under the guest route and requiring address re-confirmation even when nothing has changed creates unnecessary barriers that will drive drop-off - particularly in app-based journeys where consumers expect streamlined interactions.

We urge RECCo to ensure that once a consumer has been verified and matched to their MPAN that the verification burden for subsequent consent grants is minimised to the greatest extent possible with data protection requirements.

Q20	Do you agree that showing consumers which organisations hold consent, what data is shared, when consent was granted, and when it expires provides adequate visibility? If not, what's missing? What limitations should be communicated to manage expectations?
------------	--

Yes, this list provides adequate visibility for consumers. We highlight the importance of plain-language descriptions of the data being shared to ensure consumers can genuinely understand what they have consented to.

Q21	Do you agree that consumers need to understand which services will be affected, what happens to their data, how long changes take, and whether revocation is reversible? If not, what's missing? Is there a risk of information overload at the point of revocation?
------------	--

Yes, Ohme agrees that consumers should understand the consequences of revoking consent, including which services will be affected and what will happen to previously shared data.

For flexibility services in particular, service disruption could a tangible consequence of consent revocation that consumers should understand before confirming the action. On the question of information overload at the point of revocation, we advocate for a concise and clear summary of the immediate consequences, with the option to access more detail. The revocation confirmation screen should be unambiguous but not alarming.

Q22	Do you agree that assisted journeys should enable consumers to grant consent, review active consents, revoke consent, and receive the same information as digital users? If not, what additional outcomes are needed to achieve equivalence?
------------	--

Yes, Ohme agrees that equivalence of outcome is the appropriate standard for assisted journeys. Consumers who are unable to use digital channels should not be disadvantaged in their ability to exercise their data rights.

However, we urge clarification on where responsibility for assisted journeys lies. It is our assumption that for ATPs operating primarily through app-based interfaces, the design of assisted journeys will primarily be RECCo's responsibility through the central CCS portal. We urge RECCo to address this assumption and provide clear guidance on the interaction between ATP-managed journeys and the CCS-managed assisted channel.

Q23	For consumers who are unable or choose not to use digital services, what outcomes should an assisted or alternative consent service journey deliver to be considered fair and equivalent?
------------	---

These outcomes should mirror those available in the digital journey and those that are necessary to ensure that non-digital consumers are not excluded from the protections the CCS is designed to provide.

Governance Design

Q24	Do you have any comments on the proposed REC drafting approach, including the creation of a new REC CCS Arrangements Schedule, a new CCS Service Definition, the Customer Experience Guidelines, consequential changes to existing REC artefacts, and the new CCS API Technical Specification?
<p>Ohme broadly supports the proposed approach and highlight the importance of ensuring that the CCS Arrangements Schedule clearly delineates the boundary between RECCo's obligations and those of individual ATPs and EDPs. In particular, it should be clear that ATPs operating CCS-compliant consent journeys as part of broader app-based consumer experiences are not expected to replicate CCS portal functionality but rather to integrate with it in a manner consistent with the CEGs.</p> <p>We also recommend that the CCS API Technical Specification be published (or at least in draft) as early as possible and before the Summer 26 REC drafting consultation to allow ATPs sufficient time to assess implementation requirements.</p>	
Q25	Do you agree with the proposed initial funding model, including the ability for the cost of qualification and breach investigation activities to be recovered from the individual organisations? If not, please provide your rationale.
<p>Yes, Ohme agrees with RECCo's proposal to continue the RECCo Cost Recovery Model for the initial period post-MMP, with organisation-specific costs for accreditation and breach investigation recovered under Hybrid Model B. This approach avoids creating a financial barrier to early voluntary adoption.</p> <p>We would note that accreditation requirements for the CCS should, where possible, be aligned with or carried over from accreditation processes already completed by organisations under other relevant industry codes or future digitalisation schemes. These include BSC qualification, the Flexibility Markets Asset Register (FMAR), Smart Data Repository (SDR) and the Data Sharing Infrastructure, to avoid duplication of compliance effort for organisations participating across multiple programmes.</p>	
Q26	Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.
<p>Ohme broadly agrees with the overall structure. We support the drive to automate accreditation checks where possible and to minimise duplication with other industry code accreditation processes.</p> <p>We ask RECCo to confirm the extent to which accreditation completed under other programmes, e.g. BSC qualification, FMAR and DSR accreditation can be carried forward or recognised within the CCS accreditation process to reduce the cumulative burden on organisations operating across multiple schemes.</p>	
Q27	Do you agree that a minimum standard should be set whereby all CCS Users should be Cyber Essentials Plus certified or ISO 27001 accredited? If not, please provide your rationale.

Yes, Ohme agrees that a minimum-security standard is appropriate. The equivalence of ISO 27001 for organisations that hold it, but not Cyber Essentials Plus is a reasonable and practical position.

Q28

Do you have any comments on the application of the existing REC change process to cover management of the CCS arrangements?

We note that the rapid pace of evolution across energy data and flexibility markets and the associated commercial and regulatory landscape may at times outstrip the timescales of the standard REC change process. Therefore, we urge RECCo to consider whether an expedited change pathway could be made available for CCS changes that are time-sensitive, e.g. where a change is required to enable a specific market development or to address an urgent operational issue, while maintaining appropriate governance safeguards.

More broadly, we note that the CCS is positioned to underpin a wide range of upcoming data and digitalisation platforms, including FMAR, SDR and DSI. This interconnectedness should be explicitly recognised in the change governance framework, with appropriate mechanisms for coordinating CCS changes with related programmes to avoid conflicts or gaps.

Q29

Do you have any comments on applying the existing REC performance assurance framework to cover assurance of the CCS arrangements?

Ohme generally supports the application of the REC PAF to the CCS. However, we have the following specific concerns:

- **Consumer surveys:** We note that it will be difficult for consumers to disaggregate their experience of the CCS portal from their experience of the ATP's consent prompts. Given that the consent journey spans both environments, survey design should account for this and findings should be interpreted accordingly.
- **CEG compliance:** We urge RECCo to ensure that industry has the opportunity to review the CEGs and the compliance checklist before they are formalised, and that the checklist is proportionate in its requirements for ATPs delivering consent as part of a wider app-based consumer journey, where the CCS forms only one component of a more complex user experience. Likewise, as with the consumer surveys, we question the use of mystery shoppers to test consumer journeys.

Q30

Do you have any comments on the proposed issue/dispute resolution paths defined for the management of CCS issues?

Ohme has specific concerns about the proposed process for queried consents where the consent record shows the consent was not granted by the querying consumer.

- **Automatic termination:** We disagree with the proposal that raising a dispute automatically terminates the consent and suspends data sharing immediately. For ATPs delivering ongoing active services, immediate termination without investigation creates unjustified service disruption for consumers and commercial risk for ATPs. We strongly recommend the introduction of a brief but defined investigation window before termination

takes effect, consistent with Article 18 of UK GDPR which refers to restriction of processing while validity is checked, rather than immediate termination.

- **Investigation timescales:** We welcome RECCo's commitment to defining investigation timescales in the REC drafting. We urge that these timescales be proportionate and tiered: shorter timescales where the ATP can quickly validate or revoke a consent internally and longer timescales for more complex cases, such as multi-occupancy disputes requiring contact with the original consent granter.
- **Alignment with other schemes:** We urge alignment of any escalation route to the Energy Ombudsman with SSES dispute resolution processes to ensure consistency for consumers and organisations operating across both frameworks. We also call for explicit alignment with SSES and other relevant requirements around service continuity of smart charging and flexibility services during the period when a consent is suspended pending investigation.

Product Roadmap

Q31	Do you have any comments on the approach to defining the future roadmap within the consultation or the content of the draft roadmap in Annex G?
<p>We highlight the following priorities for earlier advancement than the current roadmap indicates:</p> <ul style="list-style-type: none"> • Tariff data: Earlier inclusion of tariff data within the CCS scope would enable a broader range of consumer-facing services and should be treated as a near-term priority. • Export and generation data: As flexibility markets and distributed energy resources grow, consent for access to export and generation data will become increasingly important and should be brought forward in the roadmap. • Federated IDV: As noted in our response to Q5, we strongly support earlier adoption of federated or delegated IDV to reduce friction for consumers and remove duplication with ATP KYC processes. • FMAR integration: Integration with the FMAR is essential for ATP operations in the flexibility market and should be progressed in parallel with CCS development. <p>More broadly, we suggest that as the CCS is likely to underpin a wide range of data and digitalisation platforms, an additional guiding principle of 'growth' should be added to the product pillars framework, reflecting the expectation that the CCS will expand to support an increasingly dynamic commercial landscape.</p>	

Additional Comments

Q32	Please provide details of any additional issues you feel have not been adequately captured within the consultation document.
<p>The CCS is being developed alongside market-wide half-hourly settlement, FMAR, DSI, SDR, Tariff Interoperability and SSES Regulations, each with their own timelines and compliance demands. The cumulative burden on organisations engaged across multiple programmes is significant. Given that the CCS is expected to underpin most of these initiatives, its sequencing and readiness has direct implications for the broader portfolio.</p> <p>We ask RECCo and Ofgem to be more transparent about who holds overarching coordination responsibility across these programmes, whether interdependencies have been formally assessed and whether the overall delivery picture is considered achievable. If this view has not yet been established, we would call on Ofgem to do so urgently.</p> <p>Likewise, the consultation does not adequately address the consumer communications risks of the MMP rollout. Early CCS users will primarily be energy suppliers and a poor or confusing initial consumer experience risks creating lasting negative associations with data sharing that could then disadvantage ATPs who integrate upon delivery of the SDR.</p>	

We ask RECCo to clarify whether CCS consumer communications and CEG development is being coordinated with the consumer-facing guidelines under SSES. Without coordination, consumers risk receiving inconsistent messages about data sharing and flexibility participation and communications developed by one programme may embed framing that creates biases disadvantageous to others.

Thank you for responding

Your response is greatly appreciated.
If you have any questions or
want to keep up to date with our
latest news, please contact us below.



LinkedIn



retailenergycode.co.uk



consumerconsent@retailenergycode.co.uk