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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 Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or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	Carolyn Burns
ORGANISATION	ESG Global
ORGANISATION CATEGORY	Tech/Software Provider
E-MAIL ADDRESS	Carolyn.burns@esgglobal.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?
We broadly agree....	
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?
We would like to seek greater clarity on how the SEC and PCF obligations that govern the SEC Other User and the CSS consent align. Unless there is a SEC Modification or a request to amend the PCF then all existing SEC obligations will continue to apply to SEC OU's regardless of the CSS consent standards and processes. We should avoid not only gaps between the 2 but also duplication.	

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>It would be helpful to understand how this difference would be identified and who needs to maintain the details of the occupiers and the relationship to the bill payer. We would not support this responsibility falling to the energy supplier without the CCS working with energy suppliers to impact assess the complexity and effort to deliver this requirement.</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>As per our answer to Q3.</p>	
<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>
<p>No comment</p>	
<p>Q6</p>	<p>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.</p>
<p>No comment.</p>	
<p>Q7</p>	<p>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.</p>
<p>We agree with this approach.</p>	
<p>Q8</p>	<p>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.</p>
<p>It's a little tricky to answer this question without knowing the requirements for which our clients and therefore our software would need to implement as EDP as suppliers are out of scope for MMP. It's also</p>	

tricky trying to predict the solution for how it will work with the interaction to TIS? In terms of TIS, we would not be supportive of the EDP (assume this is the Energy Supplier) explicitly checking the CCS before sending data to the ATP (assume this the TIS User/Optimiser). The TIS user can set webhook notifications which also have NFR's to send the update i.e. tariff, price change, change of supplier and it doesn't seem sensible to check CCS before each notification is sent. It would also highly likely require updates to the TIS NFR's if this solution design was approved. It was our understanding from the TIS solution design that consent would be set and if required, revoked, but during the period of active consent the Energy Supplier would exchange data to the TIS user as per the TIS requirements.

It's our expectation that TIS Energy Supplier (EDP for CCS), will hold their own version of consent against the customer to TIS User (ATP for CCS) and the TIS Energy supplier will only need to validate consent on first request and process request to revoke once received. The CCS will therefore be bidirectionally aligned to internal records and mapping i.e. CCS show push notification to TIS energy supplier to revoke consent and vice versa.

We would ask for the CCS and TIS to publish a joint solution design showing the end-to-end requirements and architecture.

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, but also noting our comment on TIS above.

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.

We haven't been asked to implement FAPI 2.0 by an industry change programme before but please note it is something we can implement. We would encourage RECCo/CCS team to cross check this proposed standard with the other codes and NESO to ensure a cross code and industry wide acceptance noting Ofgem's desire for architectural coordination across the sector and most recently the joint publications from DESNZ and Ofgem's Energy Digitalisation Framework and the vision for a coordinated and connected energy system.

Technical Design

<p>Q11</p>	<p>Do you have any comments on the proposed overall solution architecture and the component descriptions?</p>
<p>➤ Section6 diagram (Figure3) details the trust framework. Based on the key, It states that:</p> <ol style="list-style-type: none"> 1. The integration between an ERP and CMS is encryption only. 2. The integration between ATPs and CMS is encryption + token. 3. The integration between ERP and ATP is encryption + token + certificates. <p>Although Annex A advises FAPI2.0 as the standard- please confirm this is correct, and if so the reasoning behind the different requirements based upon data sharing (as the data transit I'm assuming is similar).</p> <p>➤ There is no acknowledgement of the considerable changes being made to TLS lifespan, domain validation and ECU separation from this year to 2029. Recommend this is assessed in terms of management across the architecture. We would be keen to support any discussions on this comment in a bilateral meeting or future working group.</p>	
<p>Q12</p>	<p>Do you agree with the proposed approach to matching MPxN to the address? If not, please provide your rationale.</p>
<p>No comment</p>	
<p>Q13</p>	<p>Do you have any comments on the non-functional requirements detailed within Annex D?</p>
<p>As per our answer to question Q8 – it is difficult to assess the NFR's without having any clear and specific requirements to work through. Generally, we would encourage a pragmatic approach to NFR's and consideration that typically the higher the availability and quickest response times = higher costs. We would also request that the NFR's for CCS are mapped to TIS and those that are not applicable or require amending are clearly updated in both programmes.</p>	
<p>Q14</p>	<p>Do you have any comments on the split between centralised and decentralised elements of the overall solution outlined in Annex D?</p>
<p>No comments.</p>	

Q15	Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E?
No further comments.	

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>No comment.</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>No comment. Except please see our general comment on management of costs and budget.</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>No comment.</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>No comment.</p>	
<p>Q20</p>	<p>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?</p>
<p>No comment.</p>	
<p>Q21</p>	<p>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?</p>
<p>No comment.</p>	

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?
No comment.	
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?
No comment. Except please see our general comment on management of costs and budget.	

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?
No comment.	
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.
No comment.	
Q26	Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.
No comment.	
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.
We support this.	
Q28	Do you have any comments on the application of the existing REC change process to cover management of the CCS arrangements?
No comment.	
Q29	Do you have any comments on applying the existing REC performance assurance framework to cover assurance of the CCS arrangements?
No comment.	

Q30	Do you have any comments on the proposed issue/dispute resolution paths defined for the management of CCS issues?
No comment.	

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>The information provided in Annex G is helpful in order to understand the vision on CCS but without actual scope, requirements, implementation dates, approach to testing etc.... it is impossible to actually plan ahead on this level of detail. Please don't assume that the 'heads up' approach in Annex G is sufficient for an accelerated deliverable (design, build, test) by those that need to conform to the future phases of CCS.</p> <p>Cross code alignment to the SEC is in 'next' phase however, if you are including DCC Other Users in MMP we would recommend that it is moved into MMP and not future roadmap.</p> <p>It would be good to see on the roadmap an item for how you identify, track and measure success of the CCS v's cost of implementation and ongoing support. What is success? When can success be considered to be tracked from i.e. from a future phase? How can the success criteria be measured and published?</p>	

Additional Comments

Q32	Please provide details of any additional issues you feel have not been adequately captured within the consultation document.
<p>We would encourage CCS MMP and future roadmap to have business case and value for money checks against each and every optional item/feature listed in Annex G. Whilst the thorough and comprehensive approach taken by the programme to date is welcomed, we must all be very conscious of costs and budgets for what is ultimately the energy customers who will be paying for this. The roadmap should not be gold plated and there might need to be an acceptance that the cost of implementation not only to RECCo but to all impacted participants might mean there is insufficient case to approve e.g. is mystery shopper UK an essential cost for the roadmap? Who is going to play the role of critical friend in CCS when it comes to scope and decisions? We are aware of the non for profit set up and our point is not about profit but on value for money against those that end up paying for the work...energy supplier and energy customers.</p>	

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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.



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