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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 Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or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	Jane Lucy
ORGANISATION	Perse
ORGANISATION CATEGORY	Tech/Software Provider
E-MAIL ADDRESS	jane@perse.energy
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>Yes, but with four qualifications. Firstly, conditional that all ATPs who wish to be part of the directory are given the opportunity to be accredited and registered in time for Go Live, to ensure the goals of fair access and prevention of anti-competitive practices are achieved. Secondly, subject to the technical concerns expressed herein being appropriately addressed. Thirdly, also subject to some clarifications and potential concerns around consent and identity management. Fourthly, we are not clear on the cost to deliver this. You acknowledge that some decisions will likely have a cost impact but do not quantify them. We are therefore unable to agree whether the proposed MMP is value for consumers and has properly balanced benefits versus costs (which will end up on consumer bills, at a time when many are already struggling with their energy costs).</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 agree that SEC Other Users should not have to migrate existing consents. However, at this stage, we do not agree that they should move to using the CCS as existing consents are renewed. We have three primary concerns. Firstly, whilst you have said that existing mechanisms that Other SEC Users have had approved by the SEC and use today “could be valid”, you have not yet agreed that they are. Our view is that they should be recognised given the SEC processes are already stringent. Secondly, you do not agree that SEC privacy assessments are sufficient to have addressed your concerns. We really struggle with your position on this. It took years for industry to agree the approaches that the SEC has taken. It has also operated for years and it is</p>

unclear to us what evidence there is that those processes have been insufficient i.e. how many breaches have there been? How many consumer complaints have there been? We are wary of the risk of people perceiving a risk without evidence of the same, or at least evidence that tips the balance of benefit versus risk. In terms of that balance, when we wrote the technical and legal recommendations of the DESNZ funded Smart Meter Data Repository we noted that at that time, only 31% of DCC Users had completed the User Entry Process. This reduced to just 8% for Other SEC Parties, being just 13 entities in total. The existing security and privacy processes in SEC are already barriers to entry. For those who have successfully passed the requirements, it is not clear why you need to add additional barriers to them. Your approach is also not aligned to your goal of “not reinventing the wheel.” Thirdly, your roadmap is not yet clear enough for ATPs to be confident to commit to this as their long-term solution.

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>Yes, but as long as you stand behind by your comments that other lawful bases still exist and should still be recognised by industry outside of the CCS. In the case of a bill payer, our view is that they are entitled to rely on contract as the relevant lawful basis and ATP access to data must be facilitated by central industry databases in the same timeframe.</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. We are struggling to understand how energy consumption data, where there are multiple occupants, is personal data given it is not impossible to attribute the data to a single individual, as you even acknowledge. ATP access to this data should be facilitated but we need a separate framework for when it is not personal data.</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>Our response is conditional on you standing behind your intent to recognise lower levels of requirements for less granular data i.e. monthly or annual consumption.</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>Yes</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>Yes</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?</p>

	If not, please provide your rationale.
No. The risks relating to cost and service availability are of concern. The ATP will be liable to ensure the consent is valid. EDPs do not need to check each time. It is disproportionate given the lack of evidence of abuse.	
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. We don't agree with the "zero trust" position and this bypasses that.	
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.
Yes	

Technical Design

Q11	Do you have any comments on the proposed overall solution architecture and the component descriptions?
No	
Q12	Do you agree with the proposed approach to matching MPxN to the address? If not, please provide your rationale.
Q13	Do you have any comments on the non-functional requirements detailed within Annex D?
<p>We would need to see actual commitments around responsivity, availability, demand and capacity, accuracy and SLAs etc to have a view. Yes, these things are all important, but we can't currently determine whether you will realistically support the market needs or not.</p>	
Q14	Do you have any comments on the split between centralised and decentralised elements of the overall solution outlined in Annex D?
<p>We have some concerns around the centralised IDV and our view will depend on the timing and breadth of the CSS roadmap around recognised IDV processes. Unless and until then, the market will need to support decentralised IDV processes. We do not see this as supplier led, but rather ATP led.</p>	
Q15	Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E?
No	

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>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>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 and yes. Whilst this information should be available to people, it does not have to be provided to them all in full up front. Otherwise, you risk people not reading it if it feels like the terms and conditions we blindly accept with products from the likes of Google, Facebook and Apple, in order to simply “get on with it”. There is also the risk that people won’t recognise or could find the description of some of the data items confusing (no one outside of the energy market really knows or cares what an MPAN is, nor why they should know or care. Listing these all out instead of using a collective term like “meter details” could undermine confidence). We suggest that a short summary with a link to more information could be a better alternative. We also suggest that if the purpose is obvious i.e. it is an implicit part of a service such as a comparison and switching journey where the purpose is to facilitate comparison and switching, then it does not need to call out that obvious purpose, only if the purpose is broader than that.</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>As above, we have some concerns around the IDV (single solution for MMP/ photo identification requirement/ lack of recognition of existing SEC approved processes/ lack of clarity around matching individual to property/ firm recommendation not to use REL data). It is difficult to understand what additional steps are being proposed given these existing barriers and friction.</p> <p>In terms of which of the existing proposed steps risk creating disproportional barriers, as indicated in earlier responses, it is unclear why the starting point for CCS was not to look at existing SEC approved processes and ask the question of “how can we further reduce barriers?”. We are unclear as to the evidence as to why more</p>	

<p>strict processes needed to be introduced. What work has been done to measure and understand barriers in SEC processes (volumes of Other SEC Users and data requests made versus those expected at the outset; volumes of residential demand flexibility delivered versus what we need etc)? What evidence has been analysed as to tangible risk or actual consumer harm from those existing SEC processes?</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>We believe the intent is that the ATP will have some input into how they are described, in order to cater for entities such as ourselves who power third party brands, with whom the consumer will be more familiar with i.e. it will make sense for us to explain the connection between Perse and Compare the Market.</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>This does sound at risk of information overload. This information is important but can be contained via a link for more information, as well as FAQs. However, at least one line of information about what service they will lose is important to ensure they are making an informed decision to revoke.</p>	
<p>Q22</p>	<p>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?</p>
<p>Yes. Downloadable FAQs/ content may also be helpful.</p>	
<p>Q23</p>	<p>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?</p>
<p>Recorded telephone calls, in line with the requirements for telesales.</p>	

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	
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.
Yes, but we do think costs need to be transparent for industry support on value for consumers. Also, visibility on future costs will be essential for buy-in from ATPs to move from existing services (such as approved by the SEC) to this.	
Q26	Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.
Yes, save and except we believe that existing SEC Other Users should be recognised.	
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	
Q28	Do you have any comments on the application of the existing REC change process to cover management of the CCS arrangements?
No	
Q29	Do you have any comments on applying the existing REC performance assurance framework to cover assurance of the CCS arrangements?
No	

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

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?
Only that this will be critical for industry buy-in. It is difficult to fully support the proposal without more information on what comes next and when.	

Additional Comments

Q32	Please provide details of any additional issues you feel have not been adequately captured within the consultation document.
We encourage testing of the address to meter matching element as early as possible as this aspect could fundamentally undermine the product, and associated consumer and industry confidence.	

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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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