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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](mailto: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 Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or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

<b>NAME</b>	Louis Daillencourt
<b>ORGANISATION</b>	Novoville – Shared Works
<b>ORGANISATION CATEGORY</b>	Tech/Software Provider
<b>E-MAIL ADDRESS</b>	<a href="mailto:louis@novoville.com">louis@novoville.com</a>
<b>RESPONSE CONFIDENTIALITY</b>	Non-confidential (recommended)

## Questions

### Scope of the CCS

<b>Q1</b>	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.</p> <p>We agree that beginning with half-hourly metered data and existing arrangements (SEC Other Users and BSC SDR) is proportionate and pragmatic. Starting with a clearly defined dataset reduces delivery risk and supports faster standardisation.</p> <p>We particularly support the hybrid architecture and the decision not to centralise energy data itself, but instead to centralise consent validation and identity controls.</p> <p>From a digital infrastructure perspective, clarity of scope at MMP stage is essential to ensure interoperability with third-party applications.</p>
<b>Q2</b>	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 with the proposed renewal-based transition approach.</p> <p>Mandating bulk migration of historic consents could create operational friction and potential consumer confusion. A renewal-based model is consistent with consent lifecycle integrity and reduces systemic risk.</p>

## REC Policy Positions

<p><b>Q3</b></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.</p> <p>Aligning consent with the individual occupying the premises is appropriate where access to consumption data reflects occupancy behaviour.</p> <p>We note, however, that in wider property ecosystems there may be distinctions between occupier, bill payer, and property owner. Over time, it may be useful to consider how consent frameworks can interoperate with property-level digital records while preserving consumer primacy for energy data.</p>	
<p><b>Q4</b></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>Yes, provided that the authority confirmation model is clearly documented and auditable.</p> <p>Clarity around representation and delegated authority will be important in multi-occupancy contexts, particularly in rented properties.</p>	
<p><b>Q5</b></p>	<p>Do you agree with the proposed approach and standard for identity verification? <i>If not, please provide your rationale.</i></p>
<p>We support the centralised IDV model at this stage.</p> <p>We particularly welcome the openness to federated identity approaches (e.g., Open Banking or government-backed ID). Alignment with broader UK digital identity principles will support long-term cross-sector interoperability.</p>	
<p><b>Q6</b></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>Providing both routes supports inclusion and proportionality. The guest approach should maintain equivalent identity assurance where consent is granted.</p>	
<p><b>Q7</b></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>Allowing consent management through ATP interfaces while maintaining a central ledger balances user experience flexibility with regulatory oversight.</p> <p>API-first design is important to support integration into third-party services that consumers already use.</p>	
<b>Q8</b>	<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>Yes.</p> <p>A real-time consent validation model is consistent with GDPR principles and enhances trust in the ecosystem.</p>	
<b>Q9</b>	<p>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.</p>
<p>We agree in principle, provided that outage definitions, duration thresholds, and audit mechanisms are clearly defined to avoid ambiguity.</p> <p>Operational resilience will be critical given the CCS's role as a trust framework.</p>	
<b>Q10</b>	<p>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.</p>
<p>Yes.</p> <p>Adopting established security standards supports interoperability and reduces implementation ambiguity. Use of recognised open standards strengthens long-term extensibility.</p>	

## Technical Design

<b>Q11</b>	Do you have any comments on the proposed overall solution architecture and the component descriptions?
<p>We support the hybrid model and clear delineation between:</p> <ul style="list-style-type: none"> <li>• Central consent ledger and IDV</li> <li>• Decentralised energy data exchange</li> </ul> <p>This separation is sensible and reduces systemic concentration risk.</p> <p>From a digital infrastructure perspective, API clarity and well-defined consent schemas will be key to enabling responsible third-party integration.</p>	
<b>Q12</b>	Do you agree with the proposed approach to matching MPxN to the address? If not, please provide your rationale.
<p>The proposed approach appears proportionate.</p> <p>Over time, interoperability between energy address identifiers (REL/MPL) and wider property identifiers (e.g., UPRN) may be beneficial to reduce fragmentation across digital property and energy systems. However, we recognise this is outside immediate MMP scope.</p>	
<b>Q13</b>	Do you have any comments on the non-functional requirements detailed within Annex D?
<p>Security, availability, and resilience standards are appropriate given the CCS's critical function.</p> <p>Scalability assumptions should anticipate significant third-party integration once the ecosystem matures.</p>	
<b>Q14</b>	Do you have any comments on the split between centralised and decentralised elements of the overall solution outlined in Annex D?
<p>We support the hybrid model.</p> <p>Centralising trust, identity, and consent validation while decentralising data flows strikes an appropriate balance between oversight and flexibility.</p>	
<b>Q15</b>	Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E?

No substantive concerns.

Clarity around webhook synchronisation between ATP systems and the central ledger will be important for audit alignment and dispute resolution.

## UX Design

<b>Q16</b>	<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>We broadly support the UX principles, including transparency around:</p> <ul style="list-style-type: none"> <li>• Who is requesting access</li> <li>• What data is requested</li> <li>• Duration of consent</li> <li>• Revocation consequences</li> </ul> <p>One additional perspective that may merit consideration is interaction between consumer energy consent and longer-lived property records.</p> <p>Where consumers move property, consent termination flows are well covered. However, future ecosystem evolution may benefit from mechanisms that allow consumers to understand how energy consent interacts with other digital records associated with a property, without compromising data protection boundaries.</p> <p>We support assisted and equivalent journeys for digitally excluded users.</p>	
<b>Q17</b>	<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>See Q 16</p>	
<b>Q18</b>	<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>See Q 16</p>	
<b>Q19</b>	<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>See Q 16</p>	
<b>Q20</b>	<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>

See Q 16	
<b>Q21</b>	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?
See Q 16	
<b>Q22</b>	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?
See Q 16	
<b>Q23</b>	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?
See Q 16	

## Governance Design

<p><b>Q24</b></p>	<p>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>
<p>We support the structured REC drafting approach and clarity around Service Definition and API specifications.</p> <p>Maintaining transparent and predictable governance processes will be important for encouraging responsible third-party participation.</p>	
<p><b>Q25</b></p>	<p>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>
<p>The initial funding model appears reasonable.</p> <p>Cost recovery mechanisms should remain proportionate to avoid unintended barriers to innovative market entrants.</p>	
<p><b>Q26</b></p>	<p>Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.</p>
<p>We agree with the accreditation model.</p> <p>Clear, predictable accreditation pathways are essential for digital ecosystem growth.</p>	
<p><b>Q27</b></p>	<p>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.</p>
<p>Minimum cyber standards are appropriate given the sensitivity of consent infrastructure.</p> <p>Alignment with existing widely recognised certifications reduces ambiguity.</p>	
<p><b>Q28</b></p>	<p>Do you have any comments on the application of the existing REC change process to cover management of the CCS arrangements?</p>
<p>Applying existing REC governance and performance assurance frameworks to the CCS is sensible.</p> <p>Consistency of governance supports regulatory confidence and ecosystem stability.</p>	

<b>Q29</b>	Do you have any comments on applying the existing REC performance assurance framework to cover assurance of the CCS arrangements?
See Q 28	
<b>Q30</b>	Do you have any comments on the proposed issue/dispute resolution paths defined for the management of CCS issues?
See Q 28	

## Product Roadmap

<b>Q31</b>	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 welcome the structured Product Pillar approach.</p> <p>In particular, the inclusion of:</p> <ul style="list-style-type: none"><li>Identity, Access &amp; Verification</li><li>Consent Lifecycle Management</li><li>Cross-Sector Interoperability &amp; Future Data Capabilities</li></ul> <p>is positive.</p> <p>As digital property and energy systems evolve in parallel, interoperability between sector-specific consent systems and durable property-level digital records may become increasingly important. Early architectural openness will reduce future integration costs and support consumer-centric digital infrastructure across sectors.</p>	

## Additional Comments

<b>Q32</b>	Please provide details of any additional issues you feel have not been adequately captured within the consultation document.
<p>We commend Ofgem and RECCo for addressing fragmented consent practices and strengthening consumer trust.</p> <p>As digital infrastructure develops across the energy, retrofit, and property sectors, there is growing value in ensuring that consent frameworks remain interoperable with wider digital identity and property data systems, while preserving clear legal boundaries.</p> <p>The CCS provides a strong foundation for energy data governance. Continued openness to cross-sector alignment will support long-term consumer empowerment and innovation.</p>	



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# Thank you for responding

Your response is greatly appreciated.  
If you have any questions or  
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latest news, please contact us below.



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