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 Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or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	Nicola Hoang
ORGANISATION	[Organisation]
ORGANISATION CATEGORY	[OrgCategory]
E-MAIL ADDRESS	[e-mail]
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 support the intent to standardise consent capture and assurance through a central trust framework, particularly the use of a centralised consent ledger, token-based validation, immediate revocation, and a hybrid model in which data continues to flow bilaterally outside the CCS. If implemented appropriately, these elements create opportunity to lower barriers to innovation associated with privacy assurance and addresses fragmentation to increase consumer trust and participation in energy data sharing.

However, inclusion of SEC Other Users (OUs) in the MMP needs careful consideration as it creates material intersects with existing SEC obligations and role-based access. Unless there is an explicit cross-code alignment plan (SEC-REC) that resolves authority, revocation precedence, liability, and assurance overlaps, there is a real risk of contradictory duties for market participants and systemic confusion for consumers. The CCS must not impose undue technical obligations, create duplication or undermine the SEC and supporting Privacy Control Framework (PCF). The DCC cannot carry risk for data access it does not control, for example, if CCS revokes consent but DCC is still required by SEC to provide data, this creates compliance risks and reduces consumer protection.

We recognise the BSC SDR potentially represents an important future data source and understand why it has been included in the MMP. However, it is important that this does not inadvertently lead to a CCS design that is optimised only for greenfield EDP implementations, as this would restrict the ability of the solution to integrate other types of EDPs with established technical architectures, security models, and data sharing agreements such as the DCC. RECCo should first determine what

a robust enduring solution looks like, including reviewing existing capabilities in the sector which can be re-used to reduce duplication and costs before committing to building the MMP (which should be a stepping stone to that enduring end-state). Finally, we believe some of the proposed technical requirements go beyond the original intent of the CCS by imposing minimum technical thresholds on the sharing of energy data between EDPs and ATPs which are already covered by established frameworks such as the SEC. This is a change in scope which industry may perceive as overreach and as such we recommend it be reviewed separately before being included in the design. There must be a clear separation between consent management and data sharing otherwise it will create governance incoherence and unacceptable risks for MMP.	
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?
[Q2 Response]	

REC Policy Positions

Q3	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.
[Q3 Response]	
Q4	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.
[Q4 Response]	
Q5	Do you agree with the proposed approach and standard for identity verification? *If not, please provide your rationale.*
[Q5 Response]	
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.
[Q6 Response]	
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.
[Q7 Response]	
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.
[Q8 Response][Q8 Response]	

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.
[Q9 Response]	
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 agree with the need for security standards to support communication between EDPs and ATPs with the CCS for consent data. For example, DCC's existing security model is already equivalent or better than FAPI 2.0/mTLS. That said, enforcement of such standards for energy data sharing itself is a possible over extension of the original scope and objectives of the CCS which proposed a hybrid model with decentralised data sharing. There must be a clear separation between consent management and energy data sharing, and the CCS construct must not undermine existing data sharing agreements already in place or it will result in incoherent governance and operational complexity. In addition, it would be good to get more information the CCS PKI services. There are existing PKI solutions already deployed in the smart meter network and a programme to renew BT as the trusted service provider (TSP). DCC's PKI service manages over 400m certificates and has been operating for over 10 years without issue and we would be happy to work with RECCo in case there is opportunity to leverage this capability to increase economies of scale and reduce overall system and consumer costs.	

Technical Design

Q11	Do you have any comments on the proposed overall solution architecture and the component descriptions?
[Q11 Response]	
Q12	Do you agree with the proposed approach to matching MPxN to the address? If not, please provide your rationale.
[Q12 Response]	
Q13	Do you have any comments on the non-functional requirements detailed within Annex D?
[Q13 Response]	
Q14	Do you have any comments on the split between centralised and decentralised elements of the overall solution outlined in Annex D?
[Q14 Response]	
Q15	Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E?
[Q15 Response]	

UX Design

Q16	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.
[Q16 Response]	
Q17	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?
[Q17 Response]	
Q18	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?
[Q18 Response]	
Q19	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)
[Q19 Response]	
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?
[Q20 Response]	
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?
[Q21 Response]	

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?
[Q22 Response]	
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?
[Q23 Response]	

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?
[Q24 Response]	
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.
[Q25 Response]	
Q26	Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.
[Q26 Response]	
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.
[Q27 Response]	
Q28	Do you have any comments on the application of the existing REC change process to cover management of the CCS arrangements?
[Q28 Response]	
Q29	Do you have any comments on applying the existing REC performance assurance framework to cover assurance of the CCS arrangements?
[Q29 Response]	

Q30	Do you have any comments on the proposed issue/dispute resolution paths defined for the management of CCS issues?
[Q30 Response]	

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?
[Q31 Response]	

Additional Comments

Q32	Please provide details of any additional issues you feel have not been adequately captured within the consultation document.
[Q32 Response]	

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