

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

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 Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or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>	Nik Wills
<b>ORGANISATION</b>	Stark
<b>ORGANISATION CATEGORY</b>	Metering
<b>E-MAIL ADDRESS</b>	nwills@stark.co.uk
<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>For a domestic-first MMP, the proposed scope appears reasonable and aligned to the stated objective of keeping the first phase narrow. Stark's main observation is that the domestic boundary should remain clear and that any later microbusiness or non-domestic development should require a separate and evidenced case. In this context, SDR is important because the consultation treats it as one of the two core MMP data-sharing arrangements, alongside SEC Other User access, and therefore as part of the initial operating baseline rather than a later enhancement.</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>For the domestic MMP, Stark understands the rationale for a renewal-led transition rather than full migration of existing SEC Other User consents. However, existing SEC Other User arrangements already operate within an established SEC privacy and assurance framework, including the SEC Privacy Controls Framework and privacy assessments against SEC Section I obligations. Stark therefore considers that any additional CCS-layer process should demonstrate a clear incremental benefit and should not duplicate or complicate existing SEC controls. Stark would also not support treating this renewal model as a precedent for any later non-domestic rollout, because broader non-domestic authority is already commonly managed through portfolio authority or delegated broker / TPI authority, whereas SEC-specific DCC access remains governed by the SEC privacy and permission framework</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>Stark has reservations about preferring occupier over bill payer / account holder as a general principle. While the domestic rationale is understandable where half-hourly data may reflect the behaviour of the person living at the premises, the bill payer or account holder may often provide a clearer point of accountability for service take-up, complaints, disputes and revocation. This is particularly relevant beyond the domestic MMP, because in non-domestic settings consent is already commonly granted through a central energy manager or through delegated written authority held by a TPI or broker across all relevant sites. If an occupier-based model is retained for domestic MMP, Stark would recommend making clear that it should not be assumed to apply in non-domestic cases, where the relevant UK GDPR and authority analysis is materially different.</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>For the domestic MMP, Stark has no strong objection to this as a practical household-specific arrangement. Our observation is simply that it should remain limited to domestic use and should not be treated as a precedent for non-domestic authority, which is already generally handled through central customer authority or delegated written authority.</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>For domestic half-hourly data, the proposed high-confidence identity verification approach appears understandable and consistent with the MMP's consumer-protection focus. Stark's main point is that this should remain a domestic MMP design choice. If future non-domestic scope is ever considered, it should not assume that business authority can simply be handled by extending the same domestic IDV model, particularly where authority is already commonly evidenced through LOAs, mandates, internal delegation and portfolio-based customer authority.</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>For domestic half-hourly data, the proposed high-confidence identity verification approach appears understandable and consistent with the MMP's consumer-protection focus. Stark's main point is that this should remain a domestic MMP design choice. If future non-domestic scope is ever considered, it should not assume that business authority can simply be handled by extending the same domestic IDV model,</p>	

particularly where authority is already commonly evidenced through LOAs, mandates, internal delegation and portfolio-based customer authority.

**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.

For domestic MMP, this appears reasonable in principle, and the business process diagrams already show ATP-led and portal-led revocation and renewal flows. Stark's observation is that, if future non-domestic scope is ever considered, renewal and revocation would require separate treatment because business authority, portfolio administration and representative change are different in nature from domestic consumer journeys. In practice, non-domestic consent is already often administered through portfolio authority or delegated broker / TPI authority, which again suggests that a CCS-based non-domestic model is not obviously necessary.

**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.

In principle, the proposed token validation and introspection model is coherent within the domestic CCS architecture. Stark would simply note that the operational impact of repeated checking should remain proportionate and not add unnecessary customer or participant burden.

**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.

Broadly, this appears understandable as a domestic resilience measure, provided the boundaries are clearly defined. Stark would welcome clarity on what constitutes a significant outage, how retry and fallback should operate, and how revoked or disputed consent is treated

**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.

The proposed FAPI 2.0 and mTLS approach appears reasonable as a trust and interoperability baseline for the domestic CCS model. Stark's broader observation is that the security model should remain proportionate to the use case in scope and should not automatically imply a need for the same consent architecture in later non-domestic contexts.

## Technical Design

<b>Q11</b>	Do you have any comments on the proposed overall solution architecture and the component descriptions?
<p>For the domestic MMP, the proposed architecture appears coherent and the Annex E diagrams provide a clear consumer-centric baseline. Stark's main point is that later roadmap items for microbusiness and non-domestic should not be assumed to fit naturally into the same model without separate design and legal justification. The fact that non-domestic authority is already commonly exercised through energy managers or delegated written authority is, in Stark's view, a key reason why such an extension does not currently appear necessary.</p>	
<b>Q12</b>	Do you agree with the proposed approach to matching MPxN to the address? If not, please provide your rationale.
<p>No strong objection for domestic MMP. Stark would only note that non-domestic and mixed-use situations are materially different and should not automatically be treated the same way if later scope is ever considered, particularly where business premises, authority models and the status of the data under UK GDPR differ from household contexts.</p>	
<b>Q13</b>	Do you have any comments on the non-functional requirements detailed within Annex D?
<p>In principle, the domestic solution will clearly depend on resilience, monitoring, availability and operational discipline. Stark would only add that proportionality remains important, because more controls are not always equivalent to better outcomes if the effort or complexity outweighs the practical benefit.</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>The proposed split between centralised trust and consent functions and decentralised data sharing appears understandable for the domestic MMP. Stark's main observation is that later business or non-domestic models, if ever considered, should not be assumed to fit this model without separate assessment of lawful basis, necessity, accountability and data minimisation. The existence of established portfolio and delegated authority mechanisms in non-domestic markets is relevant to that assessment.</p>	
<b>Q15</b>	Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E?
<p>The diagrams are useful and make clear that the current design is strongly consumer-centric, with domestic account and guest journeys, domestic queried-consent handling and standard ATP / EDP onboarding. From Stark's perspective, that clarity is helpful because it reinforces that the current design is framed around</p>	

domestic MMP rather than business arrangements. In practice, established non-domestic consent is typically already handled through portfolio authority or delegated written authority rather than through a comparable consumer-style journey.

## UX Design

<p><b>Q16</b></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>Stark is not best placed to comment in depth on domestic consumer archetypes given we do not currently serve domestic customers. We would simply note that if the roadmap retains later microbusiness or non-domestic items, those would likely need their own distinct design personas rather than being treated as extensions of household consumer types. That would reflect the fact that non-domestic authority is already commonly exercised through established portfolio or delegated models.</p>	
<p><b>Q17</b></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 detailed domestic comment. The consultation and annexes clearly frame this as part of the domestic and consumer inclusion work, which appears appropriate for the MMP.</p>	
<p><b>Q18</b></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>In principle, yes. Stark would simply note that if customers are already uncertain, adding too much information or too many steps can reduce engagement rather than build trust, so the balance between transparency and usability remains important.</p>	
<p><b>Q19</b></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 detailed domestic comment beyond noting that proportionality appears important. From Stark's perspective, this is a key point: for undecided customers in particular, each extra consent or verification step can become a reason not to engage.</p>	
<p><b>Q20</b></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>As a domestic baseline, this appears reasonable and consistent with the proposed portal visibility model.</p>	
<p><b>Q21</b></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>

In principle, yes. The consultation notes that revocation notifications and related mechanics are still being developed, which suggests there is value in making service impacts clear.

**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 detailed domestic comment beyond support in principle. The roadmap already identifies inclusive, assisted and offline journeys as later development items within the domestic solution.

**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. This appears to be a domestic design matter within the stated MMP scope.

## 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 broadly support the proposed REC drafting architecture for the CCS MMP, including a dedicated CCS Arrangements Schedule, CCS Service Definition, Customer Experience Guidelines, consequential REC amendments and a CCS API Technical Specification.</p> <p>This appears proportionate for an initial, domestic-first release focused on half-hourly metered data, but the drafting should remain explicit that this is the MMP baseline only and should not imply wider future scope at this stage.</p> <p>If non-domestic roadmap items are retained, Stark suggests that the established business-market position — including portfolio authority and delegated written broker / TPI authority — should be explicitly recognised before any new CCS-based requirement is considered necessary. Existing SEC Other User privacy and assessment controls should also be taken into account to avoid unnecessary duplication.</p> <p>Overall, the key drafting priorities are clarity of scope, clear allocation of responsibilities, and flexibility for future evolution.</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>Stark has no strong objection to the proposed initial funding model for the MMP, including continued use of the REC cost recovery model and recovery of organisation-specific qualification or breach investigation costs where appropriate.</p> <p>This appears proportionate for an early-stage service where participation is likely to be limited initially and where RECCo is seeking to avoid disproportionate costs falling on early adopters.</p> <p>Our main observation is that the model should remain proportionate as the CCS evolves. If additional layers of consent governance, qualification, onboarding or assurance are added over time, there is a risk that participation becomes a deterrent rather than an incentive, particularly where customer demand is not yet firm.</p> <p>Stark would therefore support the proposed approach for MMP but would encourage periodic review before any wider user-pays model is expanded.</p>	
<p><b>Q26</b></p>	<p>Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.</p>
<p>In principle, the proposed accreditation approach appears aligned with the broader trust framework, and Annex E already shows accreditation, sandbox testing and directory publication as core steps. Stark would simply note that proportionality remains important, particularly if future scope broadens and the operational burden grows. This is relevant where business markets already have established authority routes and may not</p>	

require an additional CCS accreditation layer. Existing SEC Other User privacy assessment arrangements should also be recognised when considering whether any additional CCS-layer burden is genuinely necessary.

**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.

In principle, yes. Stark supports a minimum security baseline for CCS Users, including Cyber Essentials Plus or ISO 27001, given the sensitivity of the data involved.

The consultation also makes clear that where ISO 27001 is relied upon, the relevant systems and processes used for CCS participation must be in scope.

Our main point is that the requirement should be applied proportionately, particularly for existing SEC Other Users already subject to sector-specific privacy and assurance controls. Where equivalent assurance evidence already exists, RECCo should seek to reuse it where possible and avoid unnecessary duplication, while still ensuring that downstream data protection and operational controls are adequately covered.

**Q28**

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

Stark has no strong objection to the application of the existing REC change process to the CCS arrangements. The consultation sets out a reasonable position that the CCS will be introduced through a REC Change Proposal and thereafter managed through established REC change control, without requiring a separate bespoke change framework for the MMP.

Stark would simply suggest that, if future microbusiness or non-domestic items remain in the roadmap, they should be assessed on their own merits rather than presumed to follow naturally from the domestic MMP.

The existing non-domestic consent position should form part of that assessment before any future CCS expansion is taken forward through REC change.

**Q29**

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

Stark has no strong objection to applying the existing REC Performance Assurance Framework to the CCS arrangements. Using the established REC assurance model for the MMP appears proportionate and avoids creating a separate regime at launch.

Our main point is that assurance should remain risk-based and proportionate, with a focus on consumer trust, data protection and operational integrity. Where equivalent controls already exist; for example for SEC Other Users.

RECCo should seek to avoid unnecessary duplication while still covering any CCS-specific gaps.

**Q30**

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

Stark has no strong objection in principle to the proposed issue and dispute resolution approach for the MMP. The consultation materials and Annex E clearly describe a domestic, consumer-oriented queried-consent and escalation model, with disputes raised through the CCS and investigated by the relevant ATP, which appears understandable for the initial scope.

## 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>Stark considers the roadmap useful in distinguishing the domestic MMP from later microbusiness and non-domestic items, but our view is that this separation should be applied more firmly. The consultation is clear that the CCS MMP is a domestic, half-hourly metered-data solution, and that domestic rationale should not be treated as creating an automatic pathway into non-domestic permissions or authority models. Stark does not consider that a sufficient case for non-domestic CCS development has been made. Non-domestic markets already operate through established authority mechanisms, including portfolio authority and delegated written broker / TPI authority, which materially reduce any current need for a separate CCS-based permissions framework.</p> <p>In Stark's view, non-domestic roadmap items should not remain in the roadmap as implied future development.</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>An additional point for next steps is that the roadmap could be clearer that future microbusiness and non-domestic items are not simply later phases of the domestic model, but potential developments that would require their own separate assessment. The consultation already distinguishes these items from the initial MMP and places them in later roadmap horizons, so there is an opportunity to strengthen that distinction in the roadmap narrative itself. As a roadmap improvement, it would be helpful to state more explicitly that any future microbusiness or non-domestic development would need its own customer problem statement, lawful-basis analysis, authority model assessment, proportionality test and evidence of market need, rather than being inferred as a natural continuation of the domestic CCS approach. That would align with the consultation's broader emphasis on phased delivery, proportionality and future expansion only where justified.</p>	



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

# 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](https://retailenergycode.co.uk)



[consumerconsent@retailenergycode.co.uk](mailto:consumerconsent@retailenergycode.co.uk)