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 Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or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	Clive Nicholas
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ORGANISATION CATEGORY	
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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?

As the gas industry's Central Data Service Provider (CDSP), Xoserve is responsible for ensuring that the correct parties are appointed, connected to, and have access to the right information for each supply point on the gas network. We are, therefore, responding on the assumption that Xoserve will be an Energy Data Provider (EDP) under the new Consumer Consent Solution (CCS). As such, we strongly support any measures that enhance consumer trust and data protection.

We agree that the proposed Minimum Marketable Product (MMP) represents a pragmatic starting point for the new CCS, which will provide a central consent portal, with standardised authentication and verification processes, and decentralised data exchange between Authorised Third Parties (ATPs) and EDPs. The limited initial scope (half-hourly metered data relating to domestic customers & core functional components) will allow industry participants to familiarise themselves with the operational processes, the consent management framework and technical interfaces before further expansion. However, care needs to be taken to ensure that the MMP has the necessary foundations and flexibility to enable extension of its scope to cover additional gas and electricity datasets, use cases and customer segments in the future. As such, a key MMP deliverable should be a clearly established platform and processes to enable EDPs to define the available datasets for ATP consumption.

It is essential that the CCS supports both gas and electricity market data and ensures interoperability with gas central systems. As such, we would welcome bilateral discussions with

RECCo to ensure that the CCS design appropriately accommodates gas market participants and avoids unintended duplication or operational disruption.	
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 understand the rationale for avoiding large-scale migration of historical consents into the CCS and agree that allowing existing consent arrangements to expire naturally is a proportionate approach. However, it will be important that this approach does not create ambiguity for Energy Data Providers (EDPs) when determining whether consent is valid. Clear guidance should therefore be provided to ensure that it is clear to EDPs when legacy consent arrangements outside the CCS do and don't apply once the CCS is operational.	

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.
Energy data systems generally identify supply points using technical identifiers (such as MPxN identifiers) rather than the identity of the individual consumer. It is important that the CCS provides Energy Data Providers with a clear and authoritative record of consent that can be relied upon when responding to data requests. The CCS should, therefore, ensure that the mechanism used to capture occupier consent remains specific to gas or electricity consumption and is clearly linked to the relevant supply point so that data providers can validate consent without ambiguity.	
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.
The key requirement for Energy Data Providers (EDPs) is that the CCS maintains a clear and authoritative record confirming that valid consent has been granted for the relevant supply point. Provided that the CCS performs the necessary checks and records the consent appropriately, EDPs should be able to rely on the consent status supplied by the CCS without needing to validate the underlying household arrangements themselves.	

We understand the proposed 'lead occupant' approach for multi-occupancy households and the need to provide a practical mechanism for granting consent where multiple individuals reside at a property. We also welcome the initial outline of how disputes over consent will be managed provided in section 8 of the consultation.	
Q5	Do you agree with the proposed approach and standard for identity verification? *If not, please provide your rationale.*
Robust identity verification processes are necessary to ensure that consent to access energy data is granted by an appropriately authorised individual and that Energy Data Providers can rely on the CCS confirmation of consent. We agree that identity assurance should be proportionate to the sensitivity of the data being accessed and aligned to existing supplier authentication processes where possible.	
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.
We recognise the benefit of providing consumers with flexible ways to grant consent, including both an account-based approach and a 'guest' journey. Offering multiple routes for consumers to provide consent may help maximise accessibility and participation. However, it is important that the same standards of identification verification apply regardless of the access route chosen.	
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.
We support providing consumers with multiple channels through which they can manage their consent, including the ability to revoke or renew consent either directly with the relevant Authorised Third Party (ATP) or via the CCS. However, it is important that any revocation or renewal of consent is promptly and reliably reflected within the CCS so that Energy Data Providers receive an authoritative and up-to-date consent status before sharing data.	
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.
We agree with the principle that Energy Data Providers should verify that valid consumer consent exists before sharing any personal data with an Authorised Third Party and the design of the CCS should target maximum system availability and resilience to facilitate this. Any such requirement would need to be implemented carefully to ensure that consent verification processes are reliable and scalable and do not impose operational delays or additional system risk.	

Clear guidance will also be needed of any specific circumstances where exceptions to such a requirement may be necessary or appropriate.	
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.
If EDPs bear the ultimate legal risks and responsibility for data sharing, then they should be able to cease data sharing immediately during a CCS outage if they judge the risk to be unacceptable, without penalty, and measures should be put in place to mitigate such risks where possible. We would also welcome a discussion regarding the allocation of GDPR compliance risks and liability in the event that an EDP shares data during a CCS outage and the consent record subsequently shows the consent had been revoked. In the event that the CCS is unavailable, the Energy Data Provider will need clear guidance on the circumstances under which data sharing can continue and any procedures that must be followed once the CCS is back online. This guidance should seek to ensure an appropriate balance between customer protection and continuity of service. In the context of the question, it is not clear what is considered to be a "significant period of time".	
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 support the adoption of established industry security standards such as FAPI 2.0 and Mutual Transport Layer Security (mTLS) for securing data sharing interfaces to promote interoperability, security and consistency. There should be an ongoing dialogue with Energy Data Providers to ensure transparent and timely sharing of detailed technical specifications so that they can design, test and implement the necessary interfaces within their existing system architectures.	

Technical Design

Q11	Do you have any comments on the proposed overall solution architecture and the component descriptions?
We welcome the publication of the proposed CCS solution architecture and the description of the various system components involved in managing consumer consent and facilitating energy data access. It is important that the architecture clearly defines the interaction between the CCS and Energy Data Providers (EDPs), including the interfaces used for consent validation and any associated operational responsibilities. In particular, the MMP should include clear processes / developer packs to support proactive EDPs. As the CCS develops further, it will also be important to ensure that the architecture remains capable of supporting participation from both electricity and gas data providers, taking into account the differences in market systems, institutional structures and characteristics across the two markets.	
Q12	Do you agree with the proposed approach to matching MPxN to the address? If not, please provide your rationale.
We recognise the importance of ensuring that consumers can accurately identify their supply point when granting consent for access to energy data. When developing the MPxN matching approach, it will be important to ensure that the solution works effectively across both electricity and gas markets, which often have different supply point characteristics. The matching approach should be sufficiently robust to minimise the risk of incorrect supply point identification so that Energy Data Providers have confidence that consent has been granted for the correct supply point and consumer trust is maintained.	
Q13	Do you have any comments on the non-functional requirements detailed within Annex D?
We support the inclusion of clearly defined non-functional requirements for the CCS, particularly in relation to system availability, performance and security. Given the reliance that Energy Data Providers will place on the CCS to validate consent before sharing energy data, high levels of operational resilience and availability are important. Clear service level expectations and performance metrics would be an important element of this reassurance.	

Q14	Do you have any comments on the split between centralised and decentralised elements of the overall solution outlined in Annex D?
We recognise the benefits of adopting a hybrid architecture that combines centralised consent management with decentralised data provision by Energy Data Providers (EDPs). A centralised consent service can provide a single authoritative source of truth for consumer consent and support consistency across market participants. At the same time, maintaining decentralised data provision ensures that data remains under the control of the organisations responsible for maintaining the underlying energy data systems. It is important that the division of responsibilities between the CCS and EDPs is clearly defined and we would welcome discussions on the development of standardised data formats and structures.	
Q15	Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E?
We welcome the inclusion of technical and business process diagrams to illustrate the proposed CCS architecture and operational interactions between participating organisations. As the CCS design progresses, it will be important that these diagrams clearly reflect the role of Energy Data Providers in validating consent and providing energy data to Authorised Third Parties. In particular, clear definition of the interfaces used for consent checks, data requests and responses will help ensure that organisations responsible for providing energy data can design and implement the necessary integrations. Providing detailed and stable technical specifications alongside these diagrams will also be important to support effective system development, testing and implementation across the industry.	

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.
N/A - we have not provided views on User Experience design.	
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?

N/A - we have not provided views on User Experience design.	
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?
N/A - we have not provided views on User Experience design.	
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)
N/A - we have not provided views on User Experience design.	
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?
N/A - we have not provided views on User Experience design.	
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?
N/A - we have not provided views on User Experience design.	
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?
N/A - we have not provided views on User Experience design.	
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?
N/A - we have not provided views on User Experience design.	

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?

We welcome the structured approach proposed for incorporating CCS arrangements within the REC framework. The creation of dedicated CCS artefacts, including the CCS Arrangements Schedule, CCS Service Definition and API Technical Specifications, should provide clarity regarding the roles and responsibilities of participating organisations.

As the drafting develops, it will be important that the obligations of Energy Data Providers (EDPs) in relation to consent validation, data provision and operational interaction with the CCS are clearly defined. This will help ensure that the responsibilities of organisations providing energy data are clearly understood and can be implemented effectively. The mechanisms though which EDPs and other gas sector affected parties can input into relevant CCS change processes, working groups and consultations should also be clearly stated.

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.

We recognise the rationale for recovering the cost of qualification and breach investigation activities from the organisations concerned. However, it will be important that the charging approach for these activities is transparent and proportionate, and that the circumstances under which such costs may be recovered are clearly defined.

In particular, clarity will be important regarding the triggers for breach investigations and how costs will be allocated where investigations involve multiple parties or where no breach is ultimately identified, as well as the measures that will be taken to mitigate such costs.

Q26	Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.

We support the principle of a CCS accreditation model to ensure that organisations interacting with the CCS meet appropriate technical, operational and security standards.

A clear and proportionate accreditation process can provide assurance that Authorised Third Parties and other CCS users operate in a way that protects consumer data and maintains confidence in the CCS framework.

It will be important that the accreditation requirements are clearly defined and that organisations responsible for providing energy data (both gas and electricity) have sufficient clarity regarding their obligations and any associated compliance requirements, and the burden on all participants is minimised where possible.

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 agree that Cyber Essentials Plus certification or ISO 27001 accreditation is an essential part of the necessary CCS Accreditation model to maintain consumer trust and ensure that consented data is accessed and used safely, securely, and lawfully. We can confirm that Xoserve is already compliant with both of these requirements.	
Q28	Do you have any comments on the application of the existing REC change process to cover management of the CCS arrangements?
We support the proposal to utilise the existing REC change process to manage future modifications to the CCS arrangements. Using established governance processes should provide transparency and allow industry participants to assess the potential impacts of proposed changes. However, we would welcome greater clarity on the mechanisms though which Energy Data Providers (EDPs) and other gas sector affected parties can input into relevant CCS change processes (e.g. formal consultation and/or working group participation) so that issues can be identified at an early stage. Where changes affect the technical interfaces or operational obligations of EDPs, it will be important that sufficient implementation time is provided to allow system development, testing and deployment.	
Q29	Do you have any comments on applying the existing REC performance assurance framework to cover assurance of the CCS arrangements?
Applying the existing REC Performance Assurance Framework to CCS arrangements is a sensible approach, as it provides an established mechanism for monitoring compliance and addressing performance issues. However, we would encourage timely transparency of Performance Assurance Board discussions where possible – particularly those relating to the gas sector or with implications for Energy Data Providers (EDPs). Given the reliance that EDPs will place on the CCS to validate consent before sharing energy data, high levels of operational resilience and availability are important and performance in these areas should be monitored on an ongoing basis, with relevant KPIs published to ensure transparency. We agree that customer surveys will be an important element of performance assurance, but would argue that regular engagement with EDPs and other relevant stakeholders should also be an important element of performance assurance and industry trust.	
Q30	Do you have any comments on the proposed issue/dispute resolution paths defined for the management of CCS issues?

We support the establishment of clear issue management and dispute resolution processes for CCS-related matters that allow all affected parties to raise disputes. Transparent and well-defined escalation paths, with clarity regarding the appropriate route for raising a dispute, depending on the nature of that dispute, will be important for resolving operational issues efficiently when they arise.

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?
We welcome the inclusion of a future roadmap outlining potential enhancements to the CCS over time. As further phases of the CCS are considered, it will be important that early visibility is provided regarding anticipated changes that may affect organisations responsible for providing energy data to support effective planning of any necessary system changes. Further, as the scope of the CCS expands, there will need to be ongoing consideration of differing characteristics across gas and electricity and their implications (e.g. level of smart meter penetration, seasonality, I&C complexity etc) to ensure that its expanded form remains fit-for-purpose in relation to both gas and electricity sectors.	

Additional Comments

Q32	Please provide details of any additional issues you feel have not been adequately captured within the consultation document.
We have no additional comments at this time, but would welcome ongoing discussions as the solution develops further.	

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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