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 Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or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	Joshua Winterton
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ORGANISATION CATEGORY	Third Party Intermediary (TPI)
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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?

We support the MMP scope and the inclusion of both SEC Other Users and the BSC SDR. Having multiple data sharing arrangements from day one is the right approach.
However, we note the MMP is limited to domestic consumers. As an AI-powered energy switching platform targeting UK SMEs, we urge RECCo to provide a clear, committed timeline for extending the CCS to microbusiness and non-domestic consumers. The "Next" horizon in Annex G contains no dates. Microbusinesses face the same data access challenges as domestic consumers - arguably worse, given the opacity of the non-domestic broker market. We would welcome a published target date for microbusiness inclusion, ideally within 12 months of MMP go-live.

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?

A phased migration through natural renewal is sensible. A forced migration would create unnecessary disruption and delay the MMP. The important thing is that all new consents go through the CCS from launch, creating a single source of truth going forward.
We would note that this approach creates a temporary two-track system where some consumers have CCS-governed consents and others have legacy consents with the same provider. ATPs should not be disadvantaged during this transition - i.e. a legacy consent held by an incumbent should not be treated as superior to a CCS consent held by a new market entrant.

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.
Agree. The occupier is the person whose behaviour generates the data and who is most affected by how it is used. In the non-domestic context (when CCS extends to SMEs), this principle should carry forward - the person on-site at the business premises should be able to consent, even if a separate entity pays the bill.	
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.
Agree. The lead occupant model is a reasonable compromise for domestic multi-occupancy. When extending to non-domestic, an analogous concept will be needed - e.g. a designated representative for a business premises, particularly for multi-tenant commercial buildings where different businesses share a single meter point.	
Q5	Do you agree with the proposed approach and standard for identity verification? *If not, please provide your rationale.*
We agree that centralised IDV is the right architectural choice. It levels the playing field, creates a single consumer identity across the ecosystem, and avoids fragmentation. However, we have concerns about the friction created by the "high confidence" (photo ID) requirement for all HH data access. For use cases like energy price comparison - where a consumer wants to check whether they are on a competitive rate - requiring photo ID creates a significant barrier. We encourage RECCo to consider whether a tiered IDV approach is appropriate: high confidence (photo ID) for ongoing data access and sharing, medium confidence for one-time, read-only comparisons where data is not stored. We also note that the guest approach requires full re-verification every time. Early delivery of the guest-to-account consolidation (currently in "Next") would significantly improve the consumer experience.	
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.
Strongly agree. Both options must be available. The guest approach is essential for reducing barriers to first-time consent, which directly supports the design principle of effective competition. Mandating account creation would increase drop-off rates and disadvantage new market entrants. We recommend that the guest approach be the default UX path, with account creation offered as an optional upgrade.	
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.
Strongly agree. Dual-channel consent management is essential. Consumers should never be locked into managing their data through a single party. The webhook-based sync mechanism is the right technical approach. We would welcome clear documentation of the webhook event schema and expected response times.	
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.
Agree. Real-time consent validation is the right approach for consumer trust. We would welcome clarity on the expected latency of the introspection endpoint, as this directly impacts the consumer experience on self-service platforms where consumers expect real-time responses.	
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.
Agree. Consumer services should not be disrupted by CCS downtime. We would welcome a clear definition of "significant period" and the process for communicating outage status to ATPs and EDPs.	
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.
Agree. FAPI 2.0 is proven in Open Banking, provides cryptographically-bound tokens, and the mTLS requirement ensures mutual authentication. This is the right security standard for energy data. We would welcome a comprehensive SDK or reference implementation, a well-documented sandbox environment with realistic test data, and clear certificate lifecycle management documentation. These resources will be particularly important for new market entrants and smaller technology companies whose participation is essential for effective competition.	

Technical Design

Q11	Do you have any comments on the proposed overall solution architecture and the component descriptions?
The hybrid model (centralised consent, decentralised data sharing) is the right architecture. We particularly welcome the machine-readable directory for API and dataset discovery, the webhook-based event model for real-time consent synchronisation, and the principle that downstream use of data by ATPs is outside CCS scope. One area we would highlight: the architecture should explicitly account for AI-powered and automated platforms as a first-class integration pattern. The monitoring and assurance framework should distinguish between legitimate high-volume automated consent processing and suspicious activity. Pattern baselines should reflect the diversity of ATP operating models.	
Q12	Do you agree with the proposed approach to matching MPxN to the address? If not, please provide your rationale.
Agree. Address-to-MPxN matching via Enquiry Services is the right approach. We would note that address matching is a known pain point in the non-domestic market, where business premises may have multiple meter points, shared supplies, or non-standard addresses. When CCS extends to non-domestic, the MPxN matching logic will need to handle these edge cases. Early consideration in the architecture would avoid costly rework later.	
Q13	Do you have any comments on the non-functional requirements detailed within Annex D?
The NFR framework is comprehensive. We would highlight that latency targets should be published and contractually binding, as API latency directly impacts conversion rates on self-service platforms. We would also welcome transparency in aggregate drop-off data across the ecosystem to identify systemic friction points.	
Q14	Do you have any comments on the split between centralised and decentralised elements of the overall solution outlined in Annex D?
Agree with the split. Centralising consent and identity while decentralising data sharing is the right balance between trust and performance. No central data lake reduces privacy risk, direct ATP-to-EDP data flows avoid bottlenecks, and ATPs can optimise their own data retrieval pipelines.	
Q15	Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E?
The diagrams clearly illustrate the consent lifecycle and integration patterns. We note that the diagrams reflect a primarily human-mediated flow. We encourage RECCo to ensure the technical architecture also supports more automated consent flows - for example, where a consumer has granted standing consent for periodic rate checks, the renewal process should be automatable via API without requiring the consumer to re-enter the consent journey each time.	

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.
The four behavioural archetypes are well-researched. We would add a fifth consideration for the non-domestic roadmap: business decision-makers who are not the energy user. In SMEs, the person switching energy is often the business owner or office manager making a business cost decision, not a personal data decision. The consent UX for non-domestic should reflect this framing. For the MMP archetypes, we note that "Digitally Confident Maximisers" represent a significant portion of self-service platform users. We encourage RECCo to ensure the CEGs do not mandate unnecessary friction for this archetype - the design benchmark should be the floor, not the ceiling.	
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?
Supportive of the WCAG 2.2 Level AA standard and the decision to exceed it in specific areas. We would welcome clarity on whether ATPs must provide their own assisted (non-digital) consent channel or whether the central CCS telephone/postal service will serve as the industry-wide assisted channel. For smaller ATPs and new market entrants, building a dedicated call centre for assisted consent would be disproportionately expensive.	
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?
Agree that who, what, and how long are the minimum for informed consent. The risk of information overload is real. We recommend a layered approach: essential information on the consent screen, with expandable sections for detail. This approach is used successfully in Open Banking consent screens and balances transparency with usability.	
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)
Additional friction is appropriate for first-time consent granting, long-duration or broad data access, and changes that expand scope. It creates disproportionate barriers for consent renewal where terms are unchanged (should be one-click), read-only one-time data access for comparison purposes, and returning consumers who have already been verified. We encourage early delivery of the persistent account option to reduce repeated verification burden.	
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?
Agree - these four data points provide adequate visibility. We would add one suggestion: include a plain-language description of the service the consumer signed up for, not just the ATP's organisation name. "Meet George - energy price comparison" is more useful than "Meet George Ltd" alone.	
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?

Agree. Clear revocation consequences are essential. Revocation should be simple and not require the consumer to understand technical details. If a consumer revokes and later wants to re-engage with the same ATP, they should be able to re-grant consent without starting from scratch - their CCS identity should persist even after all consents are revoked.	
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?
Agree in principle. Consumers using assisted channels should achieve the same outcomes. However, the implementation of assisted journeys should be centralised through the CCS's own assisted service rather than requiring every ATP to build parallel phone/postal channels. This ensures consistency while avoiding disproportionate costs for smaller market participants.	
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?
The assisted journey should deliver parity of outcome, not parity of channel. A telephone-based journey with verbal confirmation and postal confirmation letter would be appropriate. Key requirement: assisted consent must still be recorded in the CCS central ledger with the same token-based data sharing process.	

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?
Supportive. The creation of a dedicated CCS Arrangements Schedule within the REC is the right approach. We would welcome early publication of draft Customer Experience Guidelines (CEGs) - ideally before the Summer 2026 consultation - to give ATPs time to design compliant consent flows.	
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.
Strongly agree. Centralised funding with no transaction fees for early adopters is the right approach. Transaction-based pricing would create a barrier for new market entrants - exactly the opposite of the design principle of effective competition. We support cost recovery for accreditation and breach investigation, provided costs are transparent and proportionate.	
Q26	Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.
Agree. We would make two requests: (1) Proportionality for smaller organisations - the data protection assessment should be scaled to the size and complexity of the ATP's operations. (2) Clear timelines - published SLAs for accreditation processing, so new market entrants can plan their launch timelines.	
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.
Agree. Cyber Essentials Plus or ISO 27001 is a reasonable minimum. CE+ is achievable for smaller organisations without disproportionate cost. We would welcome clarity on whether CE+ certification must be in place before accreditation begins or can be obtained during the process.	
Q28	Do you have any comments on the application of the existing REC change process to cover management of the CCS arrangements?
No significant concerns. The existing REC change process is well-established and applying it to the CCS avoids creating parallel governance structures.	
Q29	Do you have any comments on applying the existing REC performance assurance framework to cover assurance of the CCS arrangements?
Supportive. Performance assurance monitoring for ATPs should account for the diversity of operating models. An AI-powered self-service platform will have different usage patterns (higher volume, more automated, spikier traffic) than a traditional broker model. Baselines and thresholds should reflect this diversity.	

Q30	Do you have any comments on the proposed issue/dispute resolution paths defined for the management of CCS issues?
Supportive. The three-tier resolution path is appropriate and the 30-day investigation window is reasonable. We welcome automatic termination of disputed consent as it prioritises consumer protection. However, in cases where the consumer themselves granted consent but has forgotten, a brief "Do you recognise this service?" prompt before termination might reduce false positive disputes.	

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 support the three-horizon approach but note the complete absence of dates for "Next" and "Later" creates uncertainty for organisations planning integration strategies.
We specifically request: (1) A published target date for microbusiness/non-domestic consent support. (2) A published target date for Tariff Interoperability dataset inclusion. (3) A published target date for delegated authority access models.
These three capabilities are interdependent and would together enable a fully digital, consent-based energy switching service for SMEs - explicitly one of the use cases the CCS is designed to support. Without committed timelines, organisations building for this use case cannot plan development roadmaps or make investment decisions.
We also encourage RECCo to accelerate white-labelled consent portals (currently "Later") - an embedded consent journey within an ATP's own platform would significantly reduce redirect friction and improve consumer experience.

Additional Comments

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

Meet George is an AI-powered, self-service energy switching platform for UK SMEs. We charge a transparent 1p/kWh fee with no hidden commissions and no sales calls. We are building for the CCS ecosystem and intend to apply for ATP accreditation when non-domestic support is available.
We are particularly invested in the CCS because it addresses the market failures we see daily: fragmented consent processes, opaque data access, and incumbent advantages that disadvantage new market entrants. A standardised consent framework is foundational infrastructure for a transparent, digital-first energy market.
Our overarching feedback is that the CCS design is strong and well-considered. Our primary request is for committed timelines on non-domestic expansion. The SME energy market is where the most significant consumer harm occurs - opaque broker commissions, complex contract structures, and limited price transparency. The CCS has the potential to transform this market, but only if non-domestic support is prioritised alongside the domestic MMP.
We would welcome the opportunity to participate in working groups as the design progresses, particularly on non-domestic use cases and the technical specification for ATP integration.

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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