

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 Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or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>	Kirsty Maddock
<b>ORGANISATION</b>	National Grid Electricity Distribution
<b>ORGANISATION CATEGORY</b>	Network Operator
<b>E-MAIL ADDRESS</b>	kmaddock@nationalgrid.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>There could be greater clarity in the provision of diagrams of the interoperability of EDP/Industry/Other Parties. We are not certain enough in the design to agree/disagree. We do agree however, that the inclusion of the SEC Other Users and the SDR is correct. The CCS should not limit itself as we do not believe this was Ofgem's intent.</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>Although there is the expectation that existing SEC Other Users will choose to engage with the CCS Project on a voluntary basis and use the CCS for the granting of new consents as the service is rolled out, this is not mandated by an obligation. Therefore, the business case of the CCS is immediately undermined.</p> <p>This would also lead to confusion of the Other Users. Would the above need be communicated to consumers? I.e would consumers assume that they have already given/revoked consent through the SEC Other Users and therefore feel that no further action is required of them? It shouldn't be assumed that consumers will know the difference between SEC Other Users and CCS.</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. The ability to take behavioural information from the energy data (including patterns of when at home, etc) makes this data personal to the consumer. Therefore, it is important that only the energy consumer is able to consent to the sharing of their data.</p> <p>However, how can we ensure that the data obtained is not then sold on to a party who has not also got similar consents? (i.e tenant consent – landlord obtains)</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>We do feel that the CCS are absolved of responsibility with the use of the 'check box' activity, however we feel it pertinent that the responsibility does lie with the ATP.</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 are pleased to see that, in line with GPG 45, the level of confidence required for granting of consent within the CCS MMP will be high. As this resembles the level required by organisations such as the NHS and financial services, it is encouraging to see that consumers data will be appropriately protected.</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. However, whilst we agree with both options, our preference would be for consumers to establish an account. This would enable consumers to receive notifications asking them to 'reconfirm' consent as and when needed. It would also provide the CCS and ATP with relevant traceability.</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>Again, to minimise friction, it would be practical if consumers were able to use either option to revoke or renew their consent, according to their preference. However, as in our answer to Q6, it would make more sense for a customer to control their own consents directly. In addition, if the</p>	

consumer has to contact the ATP to revoke consent, not only could this be an added frustration but also there would be a reliance upon the ATP to update the CCS in a timely manner.

**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.

Yes. To ensure data cannot be shared in error following revocation of the associated consumer consent, EDPs should explicitly check consumer consent before sharing data with an ATP. We understand that when a consumer revokes consent directly through the CCS, this change will be communicated to the relevant EDP and ATP but this notification should not be relied upon. In particular as we are currently unsure of how this communication will happen and feel this needs to be confirmed.

**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.

No. The EDP should not continue to share data in the event of a CCS outage due to the inability for the EDP to check the validity/status of the token. The availability requirement of 99.9% should ensure minimal downtime therefore delays should be infrequent. As above, to ensure data cannot be shared in error following revocation of the associated consumer consent, EDPs should always explicitly check consumer consent before sharing data.

**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 believe this to be appropriate.

## Technical Design

<b>Q11</b>	Do you have any comments on the proposed overall solution architecture and the component descriptions?
<p>Not at this stage. Although we would be interested to see whether there are any changes to the architecture upon procurement of a technical provider for the CCS.</p> <p>There could also be greater clarity in the provision of diagrams of the interoperability of EDP/Industry/Other Parties.</p>	
<b>Q12</b>	Do you agree with the proposed approach to matching MPxN to the address? If not, please provide your rationale.
<p>EES cannot provide greater clarity for whether an MPxN is wholly correct (i.e erroneous switch/meter mix up).</p>	
<b>Q13</b>	Do you have any comments on the non-functional requirements detailed within Annex D?
<p>These seem appropriate however until RECCo award the technical creation, we cannot make further comment on the design.</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>Please see our answer to Q13.</p>	
<b>Q15</b>	Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E?
<p>Please see our answer to Q13.</p>	

## 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>People who are unsure/afraid/wary of sharing data – will need constant/clear/significant reassurance of what the service offers, why the information being requested, exactly what it will be used for and how. People who do not use online services at all. In the same way as some people refuse to use online banking. The 'reluctants' and the 'refusers'.</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. Please see our answer to Q16.</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>Yes, it is important that consumers know who is requesting consent, what data they want to use and for how long. It is also important that there is an explicit explanation of why this particular data would be needed to provide the service that the consumer is looking for the ATP to provide. There should be no risk of information overload as long as the information is displayed in a clear, concise and easy to understand manner. There is also little control of where consumer data may be sold on to.</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>We would defer answering this question until the technical provider is in place and we have had sight of the confirmed technical specification.</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>The inclusion of data usage purposes should be added. Consumers need a clear description of why their data is being used and for what reason, in order to provide a clear understanding.</p>	

<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?
We believe consumers should have ALL information to hand. If we are to trust the consumer to give consent, we should also trust them with all information surrounding this consent.	
<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?
Yes.	
<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?
Said consumers should be granted documentation that details all of the above.	

## 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 agree that the above proposed documentation is appropriate for governance of the CCS.	
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 do not have a comment to make at this time.	
Q26	Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.
Yes. The CCS requires robust accreditation.	
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.
Yes. The CCS requires robust accreditation.	
Q28	Do you have any comments on the application of the existing REC change process to cover management of the CCS arrangements?
Whilst we implement Ofgem's SCR and SDS, we will monitor the REC change process for its applicability in this scenario.	
Q29	Do you have any comments on applying the existing REC performance assurance framework to cover assurance of the CCS arrangements?
This seems appropriate in line with qualification.	

<b>Q30</b>	Do you have any comments on the proposed issue/dispute resolution paths defined for the management of CCS issues?
No. It seems appropriate; however, we would be interested in the application of a Risk Register and Performance Assurance Techniques.	

## 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?
It is hard to determine whether this is fitting, without all service providers onboarded.	

## Additional Comments

<b>Q32</b>	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](https://retailenergycode.co.uk)



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