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 Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or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

NAME	Aaditya Goswami
ORGANISATION	SSE Energy Supply Ltd.
ORGANISATION CATEGORY	Energy Supplier
E-MAIL ADDRESS	aaditya.goswami@sse.com
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?
<p>As it stands, the proposed MMP does not achieve the CCS’s intended objective of simplifying the consent journey for customers.</p> <ul style="list-style-type: none"> <li>The solution is restricted to record <i>explicit consent</i> only, even though many data-sharing scenarios operate under alternative lawful bases, such as contractual necessity, legal obligation, or Power of Attorney. As a result, the CCS risks creating a fragmented environment in which consumers could still experience multiple data-request routes, undermining the CCS’s aim to simplify the landscape.</li> </ul> <p>The lack of broader visibility is likely to cause confusion for consumers, given that they will only see a partial view of their data-sharing relationships. ATPs must also maintain dual processes for consent-based vs non-consent-based access, increasing cost and complexity.</p> <ul style="list-style-type: none"> <li>The provision of consent by end users rather than billpayers, as well as the multi-occupancy model, are not fit for purpose. There is significant risk of occupancy mismatches and inconsistency in the recording and validity of consent, as further described in answer 12.</li> </ul> <p>Ultimately, treating the proposed solution as a marketable product is likely to further complicate the consent journey and lead to counterproductive outcomes for consumers. Rather than a marketable product, the proposed solution should be treated as a beta product to test and explore specific use cases. We urge that non-domestic implementation should remain out of scope for the CCS at present. It is important that the</p>	

MMP demonstrates robust and valuable use cases with applicability for the non-domestic sector prior to implementation.

**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?

The proposed approach is sufficient to test pilot use cases with limited data – However, for the CCS to evolve for wider deployment, it would require a process that enables the migration of consents. The risk of inconsistent recording of consent increases as the scope of the solution is scaled.

## 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>We disagree with this position. At present, we have no operational means of reliably identifying the occupier, and non-domestic suppliers do not routinely hold this information. Introducing an expectation that suppliers or ATPs must establish and verify occupier identity represents a fundamental expansion of data collection obligations, requiring parties to gather information they neither currently hold nor have a clear, lawful route to obtain. Landlords are also unable to pass this information on in a standardised or reliable manner.</p> <p>In the non-domestic sector, this approach would be even less workable. Businesses typically operate through delegated authority structures rather than individual occupiers, and consent is provided by the billpayer or another authorised representative. The contract for energy supply is with the billpayer, not with the occupier, and relying on information from a party who is not party to the contract introduces governance, accuracy and accountability risks. For these reasons, the proposed model would not be fit for purpose.</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 disagree with this position. The "lead occupant" model creates unavoidable service instability. The proposed approach allows for one occupant to grant consent for all consumers, but any other matched occupant can revoke that consent immediately, regardless of whether the service is still required. This approach may enable consent sabotage within shared households (intentionally or accidentally). It further introduces the risk of GDPR conflict, as consent could be revoked by individuals who may not have been party to the ATP/supplier-customer relationship.</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 disagree with the proposed approach. The heavy reliance on photo ID verification may lead to the unintentional exclusion of vulnerable groups of consumers.</p> <p>The approach would be further invalid for non-domestic implementation in the future. Businesses often rely on authority delegated to individual, rather than a specific individual's identity. If the proposed model is adopted for non-domestics too, it forces all service access through named individuals, creating governance and continuity risks for businesses.</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>

No comment.	
<b>Q7</b>	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.
The proposed model does not provide a cohesive view of the consents provided by customers – as a result, customers will lack the necessary information required to manage their consents effectively via the CCS account. Without the broader integrated view of consents, customers would be unable to make fully informed decisions on the revocation of consent.	
<b>Q8</b>	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 this approach – however, this is insufficient to ensure validity of consent without further measures to ensure it is recorded appropriately within the CCS i.e. that it has not expired, been revoked, or is otherwise no longer valid but has failed to update/reflect within the CCS.	
<b>Q9</b>	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.
We agree with this approach. We note that the recommended 99.9% service availability target does not strike the appropriate cost balance - a lower threshold would be sufficient and deliver better value for money.	
<b>Q10</b>	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.
No comment.	

## Technical Design

<b>Q11</b>	Do you have any comments on the proposed overall solution architecture and the component descriptions?
No comment	
<b>Q12</b>	Do you agree with the proposed approach to matching MPxN to the address? If not, please provide your rationale.
<p>We disagree with the proposed approach. The CCS checks identity using photo ID, but it only checks occupancy by matching the person's stated address to the national meter database (MPxN). It does not check tenancy records, supplier records, billing data, or ownership. Furthermore, if the REC Enquiry Service holds incorrect, outdated, or missing information, the CCS may fail to match the consumer to the property even if they do live there.</p> <p>This creates a risk that people who are not the real tenant or energy user could successfully gain access to the household's energy data. If these records are incorrect, missing, or cannot be matched, legitimate consumers may be blocked from granting consent, while inaccurate matches would also allow inappropriate access. Fallback checks, exception handling, and clear remediation routes for customers affected by inaccurate industry address data are required.</p>	
<b>Q13</b>	Do you have any comments on the non-functional requirements detailed within Annex D?
No comment	
<b>Q14</b>	Do you have any comments on the split between centralised and decentralised elements of the overall solution outlined in Annex D?
No comment	
<b>Q15</b>	Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E?
No comment	

## 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>Businesses often require complex and often bespoke data sharing agreements involving suppliers as well as third parties. As an example, a supplier may work with an agreed third party to develop a 24/7 Green tariff proposition for a grid-connected data centre – incorporating the CCS into these DSAs would hold no value for the customer business in this scenario.</p> <p>Therefore, beyond behavioural archetypes, robust use-cases with demonstrable value must be developed to justify broader implementation of the CCS in the non-domestic sector.</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 comment</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>We agree that consumers need to know all of the above – however, without the broader view of consents provided (as described in answer 1), the information provided to consumers would be insufficient and potentially misleading.</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 comment</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 noted in answer 1, the proposed solution does not provide adequate visibility. While testing the pilot product with customers, it is critical to communicate that additional consents may be held by suppliers and third parties as per contracts/ DSAs that are not within the scope of the CCS MMP.</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?
No comment	
<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?
No comment	
<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?
No comment	

## 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?
No comment	
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 disagree with the proposed approach. Considering the uncertainty around how the CCS will be used, by whom, and how often, it is inappropriate to mutualise these costs across the markets. From a non-domestic perspective, the proposed approach forces businesses to fund a solution that they are unlikely to interact with for the foreseeable future. A “User Pays” funding model would more appropriately recover costs from the customers that can sooner expect to realise the benefits of the CCS.	
Q26	Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.
No comment	
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.
No comment	
Q28	Do you have any comments on the application of the existing REC change process to cover management of the CCS arrangements?
No comment	
Q29	Do you have any comments on applying the existing REC performance assurance framework to cover assurance of the CCS arrangements?

No comment

**Q30**

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

The proposed paths are insufficient. At present, any dispute triggers automatic termination of the consent record. ATPs/suppliers must investigate and recreate consent even where the original consent was valid. No prevention mechanisms exist to stop repeated or malicious revocation.

This may significantly impact ATP/suppliers providing optimisation, flexibility, and energy-efficiency services. It also increases cost to serve and reduces consumer benefit from stable data-driven services.

We recommend implementing a “suspended” status rather than immediate termination, introduce investigation and dispute processes. Providing minimum termination timelines and service continuity protections would be additionally beneficial.

## 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?
Further consultation is required prior to non-domestic implementation, as the current product is not fit for purpose.	

## Additional Comments

<b>Q32</b>	Please provide details of any additional issues you feel have not been adequately captured within the consultation document.
No comment	

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