

Tariff Interoperability 2025-26 Minimum Viable Product Consultation

Government response to the 2025 consultation on Tariff Interoperability proposals to support consumer-led flexibility

May 2026

OGL

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Contents:

Executive Summary.....	4
Draft Electricity Supply Standard Licence Condition	7
Draft Retail Energy Code Tariff Interoperability Arrangements Schedule.....	16
Draft TI API Technical Specification and Energy Market Data Specification Changes ...	34
Draft Standards Definition Document.....	44
Implementation Timeline.....	46

Annexes:

- Annex A – Electricity Supply Standard Licence Conditions
- Annex B – Retail Energy Code Tariff Interoperability Arrangement Schedule and updates to Retail Energy Code Schedule 1: Definitions and Interpretations
- Annex C – Tariff Interoperability API Technical Specification
- Annex D – Energy Market Data Specification
- Annex E – Standards Definition Document

Executive Summary

1. The Smart Secure Electricity Systems (SSES) Programme is creating the technical and regulatory frameworks to empower consumers to participate in Consumer-Led Flexibility (CLF). This will enable them to take advantage of cheaper electricity and incentivising a more efficient use of the electricity system.
2. The Tariff Interoperability Project (TI) supports this by standardising how suppliers share tariff data. This will give consumers more choice, enabling their Energy Smart Appliances (ESAs) to easily access and respond to time-of-use and dynamic tariffs through a standardised interface.
3. Government committed to proceeding with Time of Use Tariff (ToUT) interoperability in its ‘Delivering a smart and secure electricity system: implementation’ consultation response in April 2025. Since then, we have worked alongside the Retail Energy Code Company (RECCo) to articulate how this could work in practice and held the TI Arrangements Consultation between December 2025 and January 2026 to get industry feedback.
4. This document sets out the outcome of this consultation and confirms the final design. We have set out the next steps for how we will deliver TI, including changes to industry codes and licences to begin implementation.

Key Decisions and Outcomes

5. The TI Arrangements consultation sets out how the policy objectives would be achieved. There were 25 respondents to the 18 questions, for which we are grateful. Respondents included suppliers, optimisers and trade bodies, some of which represented a collection of industry stakeholders.
6. Government welcomes the broadly positive and supportive response from the majority of stakeholders, and the strong endorsement of the project’s strategic objectives. The majority of comments related to ensuring the technical detail set out in the consultation delivered on the government’s policy intent in practice.
7. The most significant elements of feedback related to the practicality of the proposed delivery timetable and to the synergies between the TI proposals and

government's wider digitalisation agenda. In summary, stakeholders suggested delivery timelines were too tight and that there would be duplication of efforts as the consumer consent aspect of the TI Arrangements, would be delivered in parallel to the Consumer Consent Solution (CCS, also being delivered by RECCo) which addresses the same need.

8. As a consequence, we are changing the TI delivery approach by splitting phase 1 of the project into two sub phases as set out below:
 - Phase 1a – will enable consumers who know and can share current supplier and tariff name to optimise. This will be done by introducing a standardised TI Application Programming Interface (API) for sharing public Tariff Pricing Data. This will be delivered as planned by Feb 2027.
 - Phase 1b – will build on 1a and enable consumers who don't know their supplier and tariff to consent to share their data with service providers. It will introduce requirements to share Consumer Specific Tariff Information and will start delivery post-Minimum Marketable Product phase of the CCS project. This means we avoid duplicate build as the TI solution will be built directly into the CCS arrangements. We are moving delivery of this element to November 2027.
9. Reflecting this change, the Retail Energy Code (REC) drafting has been updated to remove elements relating to the Consumer Specific Tariff Information. This will subsequently be added as part of Phase 1b. Furthermore, we have reviewed and responded to all consultation responses, including those that now will be included in Phase 1b. Our position relating to these comments will feed into the further development of TI Phase 1b.
10. TI will be implemented through changes to REC and Electricity Supply Standard Licence Conditions (SLC). For Phase 1a, we will provide industry the certainty it needs to start building and testing systems by introducing new Electricity Supply Standard Licence Condition provision 11C (SLC11C). We will also introduce version 1 of the TI Arrangements Schedule, which will be approved by DESNZ and implemented into the REC in May 2026, alongside the baselined TI API Technical Specification.

11. No further changes to the SLC are planned to deliver Phase 1b. Electricity Supply SLC11C will point suppliers to the REC, which will house details of the solution to be delivered.
12. Government and RECCo will continue to work with industry to deliver the revised plan. The integration with CCS both introduces change to the TI design and adds a dependency on CCS design. To manage this, we will establish tailored working group sessions dedicated to the TI and CCS integration elements. These will focus on how suppliers will integrate with the CCS and how the consent element of the TI solution will work.
13. Finally, in light of consultation feedback, we are also making drafting changes to the SLC and REC to refine the scope to more clearly reflect policy intent. This includes:
 - Extended exemption criteria to also cover out-of-contract tariffs.
 - Expanded bespoke definition to exclude Third-Party Intermediary (TPI) commission being considered bespoke.
 - Amended SLC drafting to reflect policy position of all import and export TOU tariffs being in scope.
 - Included Block Tariffs in the Tariff API Specification to enable industry to comply on a voluntary basis and clarified this in the SLCs.
14. This will make it clear what the expectations are for those subject to the SLC obligations.

Next Steps

15. We will introduce changes to the Retail Energy Code and Supplier Licence Conditions in May 2026. This will begin the implementation period for phase 1a of the TI work which will be delivered in February 2027. Following this we start implementing phase 1b which will be delivered by November 2027. Phase 2, which is an extension to include complex tariffs, gas suppliers and other features, will be delivered alongside this with work to be started February 2027 and delivered in 2028.



Department for
Energy Security
& Net Zero

Indicative Timeline	2026	2027	2028
Tariff Interoperability Phase 1a	May 2026 – Feb 2027 - build and test Feb 2027 – Phase 1a goes live		
CCS aligned Phase 1b	2026 - Q1 2027 – CCS Dependency – Phase 1b alignment means consent elements of the TI solution will be built directly into the CCS arrangements Q1 2027 – CCS changes implemented into REC and Phase 1b implementation begins		
		Q1 2027 – Q4 2027 – Phase 1b CCS aligned design, consultation, build and test Nov 2027 – Phase 1b goes live	
Tariff interoperability Phase 2		Feb 2027 – Late 2028 – Phase 2 design, consultation build and test ~Late 2028 – Phase 2 goes live	

Draft Electricity Supply Standard Licence Condition

Our November 2025 consultation sought views on the Draft Electricity Supply Standard Licence Condition. In this section we summarise responses to those questions and set out the government's final position.

Overview:

16. Government and RECCo consulted on introducing a new condition within the Electricity Supply SLC, the new condition will require electricity suppliers to make tariff data available. The detail of how suppliers make tariff data available is then outlined within the REC.
17. The proposed condition within the SLC specifies at a high-level what suppliers are required to do. The proposals were that suppliers:
 - Make Tariff Pricing Data available via a supplier-wide standardised API.
 - Make Tariff Pricing Data available for domestic consumers.
 - Make Tariff Pricing Data available for non-domestic consumers where electricity consumption is not determined by a Current Transformer Electricity Metering arrangement.
18. Within the consultation document we also proposed that suppliers would not be required to:
 - Make bespoke contract data available.
 - Make tariff/contract data available for consumers where electricity is determined by a Current Transformer Electricity Meter.
 - Make complex tariffs (e.g. Block tariffs) available.
19. Additionally, the consultation document outlined that there would be an exemption for non-domestic suppliers who provide electricity to no more than 100,000 meter points or where the only information they would be required to make available is deemed contract data. The consultation also proposed that suppliers would be able to apply for derogation if they considered that they were not in a position to comply with the TI requirements.

Q1: Do you agree with proposals for exemption / derogation (11C.3 / 11C.8)?

Summary of responses

20. In relation to Question 1 there was strong support for the proposed clauses on exemptions and the ability for suppliers to apply for derogation. Out of 19 responses, 13 were supportive of our proposals, 4 were unsupportive and 2 did not specify. Many respondents noted that the exemption criteria and derogation were proportional and as a result small non-domestic suppliers would not be required to bear disproportionate API development costs.
21. Several respondents proposed that the exemption criteria should be expanded to include default and out-of-contract rates, as this would prevent non-domestic suppliers from having to adhere to the TI requirements solely to make these types of contracts available. One respondent also noted that the exemption criteria should be set at a system level rather than supplier and affiliate level as this would prevent larger suppliers with multiple systems having to adhere to the TI arrangements solely to make out-of-contract rates available. The rationale being that consumers on out-of-contract rates are unlikely to be the primary users of TI and being very few in number. This would mean that requiring suppliers to build and maintain APIs for this group would impose costs disproportionate to the expected benefits.
22. One respondent did not support the inclusion of Condition SLC 11C.3(A) which prevents the exemption from applying if the licensee or affiliate has previously been required to adhere to the arrangements. The respondent raised a concern that this would create disproportionate costs by requiring suppliers to adhere to the TI arrangements if they no longer provided contracts to domestic consumers.
23. A few respondents noted that the threshold for exemption was set too high and as a result there would be too much flexibility potential lost.
24. In relation to the derogation, the majority of respondents were supportive of its inclusion within the SLC. However, several respondents requested that Ofgem's consideration of derogation requests should be concluded quickly and should have a timeframe attached.

25. A few respondents also noted that unmetered supplies should not be required to be made available as these are static and do not respond to price signals.

Government response

26. Government welcomes the strong support for including an exemption and a derogation within the SLC. Government will include an exemption for non-domestic only suppliers who supply electricity to no more than 100,000 Relevant Non-Domestic Premises based on number of meter points. Government will also include the ability for suppliers to apply for derogation.
27. Government acknowledges the proposal to expand the scope of the exemption and therefore will also include an exemption for suppliers if the only information they have to make available is deemed and/or Out-of-contract¹ rates. This will avoid requiring non-domestic suppliers to develop and maintain the API solely to support a small number of consumers who have not renewed their contracts and are less likely to be the intended users of TI.
28. We will continue to include SLC 11C.3(A) which prevents the exemption from applying if the licensee or affiliate has previously been required to adhere to the arrangements. The intention of the exemption is to prevent disproportionate API development costs. However, if a supplier or affiliate has already developed their API, then the costs to adhere to the TI arrangements are reduced. If a small supplier no longer provides domestic tariffs and believes the on-going API maintenance costs would be disproportionate, they can apply for derogation.
29. Government acknowledges the concerns of those respondents that the exemption criteria is being set too high. However, we believe that this exemption criteria are proportionate. The 100,000 meter point threshold is aligned to Ofgem's definition of a large non-domestic supplier and analysis shows that a proportionate amount of non-domestic consumers on non-bespoke contracts will be able to optimise their Energy Smart Appliance (ESA) devices via the TI arrangements. The exemption criteria are important as they will prevent small non-domestic suppliers from having to bear disproportionately high API development costs compared to the optimisation benefits that will be realised.

¹ Out-of-contract Contract means a Non-Domestic Supply Contract which continues to apply to a Micro Business Consumer in circumstances where that Non-Domestic Supply Contract has been terminated or has expired through the passage of time and the same licensee continues to supply electricity to that Micro Business Consumer. - [SLC](#)

30. Government acknowledges the request for exemptions to be set at a system level, however we believe that this proposal creates a risk that the exemption criteria would capture too large a proportion of non-domestic suppliers and result in a loss of flexibility potential. If suppliers fall outside the scope of the exemption but believe they would still bear disproportionately high API development and maintenance costs, they can apply for derogation.
31. We acknowledge the concerns several respondents raised with the derogation process and timeframes for stipulate how long a derogation process would take. However, Government notes that Ofgem already have guidance and processes in place for managing derogation requests. We will not amend the existing Ofgem processes when introducing TI.
32. Government will make clear within the SLC that unmetered supplies do not need to be made available.

Q2: Do you agree with the definition of bespoke charges (11C.9)?

Summary of responses

33. In relation to Question 2 there was a mix of responses regarding whether respondents agreed with the definition of bespoke charges. Out of 15 responses to this question 8 agreed that the definition was fit for purpose.
34. Of those that did not agree with the definition the respondents were split. Several respondents noted that the definition was too vague and should be more narrowly defined so that only contracts which are not machine readable should be considered bespoke. The rationale being that many bespoke pricing structures can still be used by 3rd parties for optimisation purposes. One respondent also raised that the bespoke definition should not capture contracts which includes a Third-Party Intermediary commission which for all other intents and purposes could be viewed as tariff-like products which are widely available to a range of consumers.
35. Several other respondents believed that the bespoke definition should be expanded so that additional contracts are not required to be made available by non-domestic suppliers. One respondent believed that out-of-contract, pass-through and flex contracts should be included within the definition as this would

help recognise the different commercial arrangements within the non-domestic market.

Government response

36. Government appreciates respondents helping to clarify the differences between tariffs that are offered to domestic consumers and contracts that are offered to non-domestic consumers. It is government's intention that non-domestic suppliers should only be required to make contract data available for TI if they are not bespoke to the consumer – by which government means that the contract should be widely available on the open market. The rationale for this decision is that bespoke contracts contain commercially sensitive data and requiring them to be made available within the Minimum Viable Product (MVP) would create an additional complexity potential impacting delivery timeframes.
37. Government will clarify within the supplier licence conditions that the inclusion of a Micro Business Third-party intermediary (TPI) commission by itself does not constitute a bespoke contract if it would otherwise be considered widely available on the open market. This measure will help ensure that only truly bespoke contracts are exempt from having to be made available.
38. Government has considered expanding the bespoke definition so that it also includes out-of-contract and pass through contracts. However, we have decided not to make these changes because if they are widely available and compatible with the technical requirements within the REC, then there are no commercial sensitivity and no additional complexity. Extending the bespoke definition to include these contracts would further limit flexibility benefits.
39. Government also reiterates that whilst we are not requiring bespoke contract data to be made available, the API will support bespoke contract data and suppliers can opt to make this data available if they choose to.
40. Feedback suggests that bespoke contracts make up a significant portion of the non-domestic market. We are committed to realising flexibility benefits as much as is practical and will review whether to require bespoke contracts be made available again before introducing phase two of TI.

Q3: Do you agree with the definition of relevant non-domestic premises (11C.9)?

Summary of responses

41. Many respondents showed broad support for the definition of Relevant Non-Domestic Premises. Out of 14 responses 9 agreed with the definition outlined within the draft SLC.
42. Of those who supported the definition, several respondents acknowledged that as part of Market-wide Half Hourly Settlement (MHHS) Meter Classes are being phased out. Several respondents also confirmed that in order for TI to effectively distinguish between smaller non-domestic consumers and non-domestic consumers with complex energy needs, a definition based on using a Current Transformer Electricity meter was an appropriate differentiator. Several others also highlighted that non-domestic suppliers can easily understand which consumers have a Current Transformer Electricity Meter which in turn makes it easy to understand which contracts have to be made available in accordance with the TI requirements.
43. A few other respondents did, however, raise concerns with the proposed definition, flagging that SSES is introducing a load controller licence which utilises a different definition creating a lack of alignment across the programme. Additionally, a few respondents highlighted that whilst the proposed definition may be appropriate for TI purposes, they were concerned that it could set a precedent for other areas of energy policy. A few respondents suggested that to prevent this, a wider consultation should be held to fully understand the impacts outside of TI policy.

Government response

44. Government welcomes the broad consensus in favour of the definition of Relevant Non-Domestic Premises within the draft Electricity Supply Standard Licence Conditions. Government will use “Non-Domestic Premises at which the quantity of electricity supplied to the premises is not determined by a Current Transformer Electricity Meter” as the definition to make clear the types of non-domestic consumers for which suppliers must make data available.
45. We further acknowledge that, within the SSES programme, different definitions are being used. However, we do not consider utilising different definitions to be an issue as the definitions are for two different licence activities with different

objectives. As a result we have made the decision to utilise definitions which are the most appropriate in each given area.

46. Government acknowledges the concerns of respondents that this definition could set a precedent across other areas of energy regulation. However, we are confident that across government and delivery partners, evidence-based decisions are made which fully assess the requirements of the energy market, stakeholders and consumers. We are confident that if a more appropriate definition is required to differentiate between small non-domestic consumers and those with complex energy needs for an alternative regulatory need, then those introducing the change will not be negatively influenced by the inclusion of the TI SLC.

Q4: Do you have any other comments on the proposed clauses of the new condition to be introduced into the Electricity Supply Standard Licence Conditions?

Summary of responses

47. There were 14 responses to Question 4. The majority of respondents were in favour of the new SLC and were supportive that the SLC would correctly outline supplier requirements at a high-level.
48. A few respondents noted that additional clarity could be provided within the SLC around those tariffs which do need to be made available and those which do not.
49. A few respondents also flagged that alternative drafting would ensure that suppliers do not create tariffs which do not align with the API technical specification in order to avoid having to make tariff data available.
50. A few respondents were not clear on whether export tariffs are required to be made available therefore expressed that there is a lack of clarity around supplier requirements.
51. Additionally, several respondents suggested that the timeline for compliance will be challenging. They raised concerns with suppliers having to adhere to the SLC by 1 January 2027 and requested additional time before compliance is required. They proposed a phased approach to compliance whereby smaller

suppliers have a longer development time before being required to adhere to the TI requirements.

Government response

52. Government welcomes the broad consensus in favour of the new Electricity SLC.
53. We will provide additional clarity within the SLC to make clear that unmetered supplies and block tariffs are not required to be made available. This will ensure its clear to electricity suppliers which types of tariffs have to be made available
54. We acknowledge the concern raised that suppliers may not be required to make data available if their tariffs do not align with the API Technical Specification. However, we believe that requiring suppliers to only offer tariffs that adhere to the API Technical Specification would place too high of a commercial restriction on suppliers to develop alternative tariff offerings. We will monitor tariffs which are not being made available through TI arrangements and if a significant proportion are not being required to be made available, we will seek to address this in future updates to TI.
55. We acknowledge that requiring export tariff data to be made available will help ensure maximum consumer-led flexibility benefits. We will therefore, update the SLC to make clear that export tariff data has to be made available.
56. We acknowledge the concerns around implementation timelines. As per the executive summary we have taken measures to introduce public Tariff Pricing Data and Consumer Specific Tariff Information in a phased approach. Government's decision to phase delivery will allow suppliers more time to develop their systems and help to address their concerns around implementation timelines.

Draft Retail Energy Code Tariff Interoperability Arrangements Schedule

Our November 2025 consultation sought views on the Draft Retail Energy Code Tariff Interoperability Arrangements Schedule. In this section we summarise responses to those questions and set out the government’s final position.

Overview:

57. Government and RECCo consulted on a new REC Tariff Interoperability Arrangements Schedule as well as new Tariff Interoperability definitions to be included in REC Schedule 1: Definitions and Interpretations. The proposed changes to the REC set out the detailed requirements for suppliers, Tariff Interoperability Users (TI Users) and Registered Tariff Interoperability (RTI) Users for provision and access to tariff data, including both public Tariff Pricing Data and Consumer Specific Tariff Information.

58. As noted above, the proposals linked to Consumer Specific Tariff Information have been descoped and a further consultation to implement the changes required to deliver Phase 1b will be published later this year. To support this future development, we have included consultation comments and Government’s response to the elements of the REC Schedules that relate to Phase 1b within this document.

Q5: Do you have any comments on the proposed REC TI Arrangements Schedule drafting (including the template User Agreement) and the proposed new TI related definitions that will be moved to REC Schedule 1 (Interpretations & Definitions)?²

Summary of responses linked to Phase 1a requirements

59. There were 18 responses to this question. We note that this question was very broad in scope and where respondents raised points that related to other, more

² This question relates to the draft TI Arrangements Schedule issued for consultation, which included provisions relating to the sharing of public Tariff Pricing Data and Consumer Specification Tariff Information. In line with the phased delivery approach set out in the executive summary, we have set out consultation comments and the Government responses separately for Phase 1a and Phase 1b elements.

targeted questions in the consultation, these have been captured against those questions.

60. The TI Arrangements Schedule was generally supported by respondents with some respondents raising specific issues for consideration.
61. To facilitate the provision of tariff information by suppliers and increase the benefits of the TI arrangements for consumers, several respondents said that the scope of the REC Schedule and associated TI API Technical Specification should be expanded to include Type of Use Tariffs, Block Tariffs and Time of Use Tariffs that differentiate based on days of the week/weekend/seasons.
62. A few respondents noted concerns that supplier and REC Code Manager data retention requirements of three months were not sufficient for issue resolution, while other respondents suggested that this could lead to large amounts of data being stored, particularly in relation to requests for public Tariff Pricing Data, which would increase costs and may not be required.
63. A few comments were received regarding the structure and readability of the REC Schedule itself, proposing the use of business process diagrams rather than the current interface tables.
64. Several respondents suggested that the proposed daily API monitoring report from suppliers to the REC Code Manager was disproportionate and not in line with existing supplier monitoring under the REC.
65. One respondent questioned whether access to TI Arrangements should be restricted based on the requesting TI User's geographical location.
66. To mitigate malicious attacks, one respondent suggested that suppliers should be able to suspend access to the TI arrangements from an individual TI User IP Address where a certain limit was breached, e.g. 1,000 calls per second. This would be additional to the existing proposal in the new REC Schedule to allow a supplier to suspend access to its service as a preventative measure where it was receiving more than 10,000 calls/second across all TI Users.
67. A few respondents also raised concerns about API call volume management, noting that without a mechanism to incentivise responsible use, excessive call volumes could disrupt data availability.

Summary of responses linked to Phase 1b requirements

68. In relation to the Phase 1b requirements, two respondents said that it was unduly restrictive to limit RTI User authorisation to United Kingdom (UK) based companies and requested that this requirement be relaxed.
69. A few respondents said that references to consumer consent should be amended to customer consent as it is the bill payer rather than the occupant that holds the account with the energy supplier and is in the position to agree to data being shared.
70. One respondent requested clarification on whether RTI Users should be restricted in all circumstances from publishing information made available via the TI arrangements or if it would be acceptable to publish information where agreed with the relevant consumer.
71. One respondent requested additional clarity be added to the paragraph 1.9 requirement to issue notifications where a supplier is ceasing to share Tariff Pricing Data. It said that it should be clearer that this may relate to a supplier who is ceasing to participate in the TI arrangements entirely (where not obliged to participate through their Supply Licence) or may relate to a supplier who is ceasing to share data relating to a specific metering point, where Tariff Pricing Data has previously been shared on a voluntary basis.
72. Finally, one respondent questioned whether suspending or revoking an RTI User's access to the TI Arrangements also revoked the consent in place from a consumer.

Government response linked to Phase 1a requirements

73. Government welcomes the general support from respondents for the proposed new REC Schedule and the detailed comments provided on specific matters. In response to the feedback received, we have made several amendments to the drafting. These changes are summarised below, and the updated REC drafting is provided in Annex B.
74. We will make changes to the scope of the API set out within the TI API Technical Specification to include Type of Use Tariffs, Block Tariffs and Time of Use Tariffs that differentiate based on days and hours. We have not received evidence that



demonstrates that it is necessary at this stage to incorporate tariffs that differentiate on a monthly/seasonal basis. However, this could be added in a later phase if required. As noted in Government's response to Question 4, Block Tariffs are not mandated, so the scope of the TI API Technical Specification has been extended to allow TI Energy Suppliers to provide these on a voluntary basis only.

75. We will amend the supplier and REC Code Manager data retention requirements to ensure that data is retained for a reasonable time period and to ensure that the requirements focus on the data that is most relevant for issue resolution. We have therefore extended the data retention requirements to 15 months – 3 months live and 12 months in retrievable archive, (see Annex B, updated REC Schedule, paragraphs 1.13 and 2.9(b)). This approach aligns with other data requirements in the REC e.g. requirements on Central Switching Service Users set out in REC Schedule 25³. We have also reduced the burden on suppliers by removing the requirement to retain data on TI User API requests and responses. Instead, TI Energy Suppliers will be required to retain a record of the changes to the tariffs that they must make available to TI Users (see Annex B, updated REC Schedule, paragraph 2.9(b)) and, when Phase 1b is introduced, retain data for the prescribed period in relation to the provision of Consumer Specific Tariff Data to RTI Users.
76. We note the concerns raised regarding the structure of the REC Schedule. This structure reflects the existing REC approach where interface tables are included within the Schedule and additional guidance, including business process diagrams are provided alongside the legal obligations. We intend to develop this additional guidance information alongside the delivery of the TI arrangements.
77. In relation to performance assurance reporting, we agree that the proposed requirement for suppliers to provide a daily API monitoring report to the REC Code Manager would be disproportionate. We continue to consider that monitoring of the TI arrangements is necessary to support its efficient and effective operation. However, the introduction of a daily API report for TI does not align with the current approach for supplier reporting under the REC. We have therefore amended the REC Schedule to include a requirement for suppliers to provide a monthly report, via the REC Portal, alongside other performance

³ [Central Switching Service Schedule](#)

assurance reporting. RECCo will progress a consequential change to the REC Performance Assurance Reporting Catalogue (PARC) to introduce the new monthly reporting requirement. This will also capture the reporting requirements set out in Electricity Supply Licence SLC11C at DESNZ's request and to help ensure that monitoring data is collected in the most efficient way possible. RECCo will still develop and implement a monitoring tool which will imitate the activities of a TI User and monitor the live operation of TI Energy Suppliers.

78. We do not consider that it is practical or necessary at this point, to permit suppliers to restrict TI User access from certain geographical locations. However, we do agree that suppliers should be permitted to block API calls from an Internet Protocol (IP) Address that exceeds a certain threshold. We agree that 1,000 calls/second appears to be reasonable and will keep this under review in live operation (see Annex B updated REC Schedule, paragraph 2.8(c)). We consider that this approach has the benefit of allowing access to be restricted at an individual TI User level without disrupting other TI Users that are calling a supplier's service.
79. Government acknowledges the concern about incentives on TI Users to limit API call volumes and notes that the rate limiting provisions set out in the REC TI Arrangements Schedule, including the ability for suppliers to block individual IP addresses exceeding 1,000 calls, provide a proportionate control mechanism at this stage. This will be kept under review in live operation.
80. We have made a number of drafting updates to address specific comments on the REC Schedule, for example, we have simplified the drafting by removing references to Tariff and 'Non-Domestic Supply Contract' and either used an updated definition of 'Tariff Pricing Data' or used the new term 'Tariff Id' depending on the context. To match the update to the Electricity Supply Licence (see Question 4 above) we have also included export within the definition of 'Tariff Pricing Data'. These changes are shown in the red-line update to the REC Schedule shown in Annex B.

Government response linked to Phase 1b requirements

81. In relation to the Phase 1b requirement for RTI Users to be UK based companies, we propose to relax this requirement and instead require compliance with REC obligations on data protection and information security. This includes

restrictions on processing and transfer of personal data, including limitations on processing locations and applicable assurance measures.

82. In response to a request for clarification, we do not consider that the TI arrangements should restrict the ability of an RTI Users to seek bilateral tariff access arrangements with suppliers, noting that this restriction is not in place for a TI User. However, where a bilateral arrangement is being relied upon for access to data, the requirements and protections afforded by the legal requirements in the Electricity Supply Licence and the REC would not apply.
83. We agree that references to 'consumer consent' should be amended to 'customer consent' in Phase 1b. It is the customer, i.e. the account holder, that has the direct relationship with the supplier and is able to agree to information about the account being shared. While the customer and the consumer are typically the same person, this is not always the case. This change is not required for Phase 1a.
84. We have reconsidered the proposed restriction on RTI Users publishing information made available via the TI arrangements. We recognise that some suppliers may have restrictions in place with the consumer on data use, but this may not be the case in all instances. We have therefore updated our proposals to allow RTI User to publish Tariff Pricing Data, but only in the circumstance where they have express agreement from the consumer.
85. We propose to amend the drafting for Phase 1b to clarify the requirements for issuing a notification when a supplier is ceasing to participate in the TI arrangements. This change will allow a supplier to provide a notification if they choose to cease voluntary participation generally and / or if they choose to cease sharing Consumer Specific Tariff Information for specific metering points. To facilitate this, we propose to change the 'Cessation' TI Event Notification so that it includes meter point identifier ('MPxN') as an optional field.
86. We propose to update the Phase 1b REC Schedule drafting to clarify that while a RTI User's suspension/removal from the TI arrangements does not revoke a consumer's consent, Consumer Specific Tariff Information, for example TI Event Notifications, will not be provided while suspension is in place.

Q6: Considering the scope of the tariffs which are applicable under the Minimum Viable Product (MVP), we welcome views from Suppliers on the number of your existing tariffs which would fall outside the scope of the MVP, along with a rationale for why these would be excluded.⁴

Summary of responses

87. There were 10 responses to this question.
88. Several respondents said that for non-domestic consumers only a small percentage of their tariffs would be in scope based on the exclusions set out in Electricity Supply Licence SLC11C and the TI API definition. One respondent said that only its non-domestic deemed contract tariffs would be required.
89. Several respondents said that for domestic consumers, generally their tariffs would be included. One respondent noted that their Type of Use Tariffs (e.g. where separate unit rates apply to electric vehicle charging) was not included and another raised concerns that bundled products (where the tariff is restricted to certain consumers) were not captured within the scope of the TI API definition. One respondent noted that domestic tariffs with ‘fair usage’ or ‘peak save credit’ may be out of scope and another respondent requested additional guidance on what tariffs would be mandated.
90. Several respondents argued that this first phase of the TI arrangements project should cover as many tariffs as possible, with requests from some to include more complex tariffs within scope e.g. Block Tariff based on consumption bands.

Government response

91. Government thanks respondents for the data provided. While we note the small sample, this has nonetheless helpfully informed our decision making.
92. Further consideration on the scope of the tariffs that are captured in this first phase of delivery is set out in Government’s response to Question 5. Where changes have been made, these have been reflected in the updated TI API

⁴ This question relates to the scope of tariffs included in Phase 1 of the TI arrangements and is therefore equally applicable to Phase 1a and Phase 1b.

Technical Specification in Annex C. The scope reflected in the Phase 1a delivery is expected to remain unchanged for Phase 1b, as this will focus on the extension to include access to Consumer Specific Tariff Information. As noted in the December 2025 consultation document, Government's intention is to further extend the scope of the tariffs that can be accessed through the TI arrangements project in Phase 2.

Q7: Do you agree with the proposed timeframes for issuing event notifications as set out in Paragraph 4.5 of the draft REC TI Arrangements Schedule?⁵

Summary of responses

93. There were 12 responses with 8 expressing support for the consultation proposals and 4 providing specific comments.
94. A few respondents said that the 60-minute requirement for sending a 'Tariff Change' TI Event Notification should start from when the supplier agrees a new tariff with the consumer, rather than when the consumer requested a new tariff. This is because requests from consumers may not always be fulfilled, e.g. where the tariff was not applicable to the consumer's specific circumstances.
95. One respondent requested views on compatibility of TI Event Notifications and the Supply Licence SLC31I obligations to provide domestic customers with sufficient notification of a unilateral price increase, an increase in charges and the terms that will apply at the end of a fixed-term contract.
96. One respondent questioned the feasibility of a TI Energy Supplier processing and sending a 'Consent Revocation' TI Event Notification to the RTI User within 60 minutes of being notified by the consumer, given the various channels through which consent could be received.
97. One respondent suggested that the requirement to send a 'Tariff Update' TI Event Notification 'by 10pm on the day before the tariff becomes effective' was not in line with their expectations and should be amended to 'by 60 minutes

⁵ This question relates to the provision of Consumer Specific Tariff Information, which we propose to implement as Phase 1b of the TI arrangements project. Having taken into account consultation responses, we have set out our position, and note that the Phase 1b requirements will be consulted upon later this year.

ahead of the tariff becoming effective'. This respondent stated that the proposed change would align to the broader requirement in the REC TI Arrangements Schedule paragraph 2.14 to update tariffs available through the public route at least 60 minutes in advance of them being effective. Another respondent suggested that TI Users should be given 6 to 8 hours' notice of a tariff change to facilitate optimisation at a consumer's premises.

Government response

98. Government welcomes the support provided and continues to consider that the timescales for suppliers to send TI Event Notifications to RTI User are appropriate, subject to the following changes. As TI Event Notifications are part of the Phase 1b design, these changes are not reflected in the updated REC TI Arrangements Schedule shown in Annex B. The Government position set out below indicates the current view, which will be reflected in an updated version of the REC TI Arrangements Schedule, to be issued for consultation later this year.
99. Government proposes to amend the 'Tariff Change' TI Event Notification so that this would be triggered by a consumer agreeing a new tariff with its supplier, rather than them requesting a new tariff. This update acknowledges that a request to change tariff from a consumer may not always be able to be fulfilled by the supplier or may, if it requires a change to metering, take time to fulfil.
100. We do not consider that there is a direct link between the requirements to notify consumers of a change to tariff details (as required by Supply Licence SLC31I) and TI Event Notifications. This is because the purpose of the licence obligation is to provide consumers with sufficient notice of a change so that they can undertake any mitigating actions before that change takes effect, whereas the purpose of the TI Event Notification is to inform the TI User of a change that will take effect so that the TI User can update the information it uses for optimisation. However, prompted by this question, Government proposes to clarify in the REC Schedule that, where there is no express consumer agreement to a new tariff, for example where the consumer rolls-off a fixed-term contract and onto a variable term contract, the tariff change should be notified to a RTI User, where a consumer consent in in place, at least 60 minutes before the tariff change takes effect.
101. To allow RTI Users to better interpret TI Event Notifications, Government proposes to include an Effective From Date (EFD) in TI Event Notification

messages so that RTI Users are aware of when a tariff will change or be updated or when a change of supplier or cessation of participation in the TI arrangements will take effect.

102. Government proposes to amend the requirement to send a ‘Revocation of Consumer Consent’ TI Event Notification to 1 working day (from 60 minutes) after receipt from the consumer. This will align with requirements proposed elsewhere in the REC Schedule and reflect that consent revocation can be received through many routes and may take time for the supplier to process. We note that further discussion regarding the management of consent will be progressed as part of the Phase 1b design work, which may impact this requirement further.

103. To align with general tariff update requirements in the REC TI Arrangements Schedule, Government proposes to amend the drafting so that the requirement to send a ‘Tariff Update’ TI Event Notification, which covers a change to the unit rate, standing charge or time variables associated with the consumer’s tariff or non-domestic contract, is sent at least 60 minutes before the tariff change takes effect, rather than by 10pm the day ahead of a change.

Q8: Do you have any concerns with the proposed metrics included in the draft REC TI Arrangements 7 Schedule in Annex D? These which are shown in square brackets, bold and red for ease of reference.⁶

Responses linked to Phase 1a requirements

104. There were 10 responses to this question. Several respondents noted their support for the proposed metrics, while others provided detailed comments on specific proposals.

105. A few respondents commented that the 72-hour API message retry strategy, when a message was not received, was too long and therefore not proportionate.

⁶ This question relates to the metrics applicable to the sharing of public Tariff Pricing Data and Consumer Specification Tariff Information. In line with the phased delivery approach set out in the executive summary, we have set out consultation comments and the Government responses separately for Phase 1a and Phase 1b elements.

106. One respondent suggested that supplier capacity requirements should be scaled based on portfolio size.
107. One respondent challenged that the 3-month notice period for ceasing to participate in the TI arrangements was too long for a supplier opting out of voluntary TI participation.

Summary of responses linked to Phase 1a requirements

108. A few respondents questioned why suppliers were required to action consumer consent revocations within 60 mins of receipt, while RTI Users had 1 working day.
109. A few respondents requested an increase to the 5 working day notification period to suppliers that their security credentials to access the TI User Register would expire.

Government position on Phase 1a requirements

110. Government welcomes the responses provided on the draft metrics in the REC Schedule. We have made the following updates to address these comments in the updated REC Schedule for Phase 1a (see Annex B):
111. We will update the TI API message retry strategy to align with the approach used elsewhere in the REC⁷. Under this revised approach, suppliers and TI Users will, following a message failure, be required to make 3 attempts at 20 sec intervals and then hourly for maximum of 12 hours before contacting the intended message recipient to resolve the matter (see Annex B, updated REC Schedule, paragraph 2.16). We propose to apply this message retry strategy to RTI Users when the REC TI Arrangements Schedule is developed as part of Phase 1b.
112. For operational simplicity, and to reflect that there were no concerns raised by suppliers, we do not propose to scale supplier capacity requirements based on portfolio size.
113. Government does not support updating the three-month notification requirements for non-mandated suppliers that have opted in to the TI

⁷ Paragraph 2.4 in REC Schedule 24 [Switching Data Management](#)

arrangements, if they decide to opt-out. This notice period allows TI Users to manage commercial arrangements with consumers where they have been relying on the information provided under the TI arrangements.

Government position on Phase 1b requirements

114. We propose to update and align the supplier and RTI User timescales to process and act on a consumer consent revocation so that the obligation is to do this as soon as possible, and within 1 working day. This change reflects the view from respondents that 60 minutes for suppliers to undertake this activity is too short given that revocation requests from consumers can be received through many routes and can take time to process.

115. We agree that the 5 working days advance notification from RECCo to suppliers of expiring security credentials to access TI User Register could be too short. We propose that this is increased to 15 working days and note that this will be subject to further consultation on the Phase 1b proposals later this year.

Q9: Set out in paragraph 1.14 of the draft TI Arrangements Schedule is our intention is that the User Register will be publicly available so that consumers can identify whether their current or prospective third-party service provider is registered. We seek views on whether the list of RTI Users, including identifier and organisation name, should remain publicly available or whether access should be limited to Energy Suppliers. Note that, access to RTI User Registration Data (e.g. webhooks and operational contact details) would be limited to Energy Suppliers.⁸

Summary of responses

116. There were 17 responses to this question and the majority supported making the TI User Register publicly available. Views in favour of publication said that this would provide transparency for consumers on the list of authorised RTI

⁸ This question relates to the provision of Consumer Specific Tariff Information, which we propose to implement as Phase 1b of the TI arrangements. Having taken into account consultation responses, we have set out our position, and note that the Phase 1b requirements will be consulted upon later this year.

Users, without needing to go through a supplier, and would increase confidence and trust in the TI arrangements.

117. A few respondents did not agree and noted concerns with publicising the TI User Register.

118. Two respondents that did not support publication said that it could present a security risk because the greater the number of exposed parties the greater the number of attack vectors for malicious third parties. These respondents suggested that special provision could be made for a consumer that wanted to check that a third party is an RTI User.

119. One respondent was concerned that this would create an administration burden for RTI Users.

120. One respondent also stated that publication could create false confidence for consumers, for example if it included RTI Users that are not active.

121. A few respondents suggested an enhancement to the TI User Register so that it listed suppliers that can provide optimisation services.

Government response

122. Government welcomes the broad support for this proposal and continues to consider that the TI User Register should be published as it would provide transparency for consumers on the list of active RTI Users and would help to build confidence and trust in the TI Arrangements.

123. Government does not agree that publication presents a material security risk as the publicly available information on the TI Register would be limited to the name of the organisation. We also do not agree that consumers should only be informed, on request, whether a third party is an RTI User, as this would add unnecessary friction to the consumer experience and could deter take up and reduce benefits.

124. Government does not agree that publication of the TI Register would be an administrative burden for RTI Users, suppliers or consumers. It is proposed that the TI User Register would be maintained by REC Code Manager using information provided by the RTI User at the application stage. Consumers could

choose to access the TI User Register if they wished to so do and it is not a requirement.

125. To address the concern that the TI User Register would provide false confidence, RECCo would remove RTI Users that are not active and determine, with input from its Performance Assurance Board (PAB), if an RTI User that has been suspended, should also be removed from the TI User Register.

126. Government does not support inclusion in the TI User Register of suppliers that can provide optimisation services. This is not the purpose of the TI User Register, and it would be for suppliers to manage this directly with their existing customers or advertise to potential customers. Where a supplier wanted to become an RTI User, it could request do so, and if it met the criteria to become an RTI User, it would be added to the TI User Register.

Q10: Do you agree with our assumption that in the majority of instances TI Users could identify a consumer’s correct Public Tariff Pricing Data if provided with their Tariff Name and Postcode? If not, please provide the additional data items that would be required and reasons why.⁹

Summary of responses

127. There were 18 responses to this question. Whilst some respondents provided a neutral response, there were no respondents agreeing with this assumption, with the majority proposing additional data that would be required.

128. Several respondents said that, as tariff names are not unique, the tariff name and postcode were insufficient to identify a consumer's tariff.

129. Respondents provided views on the additional data items that they considered should be provided to help TI Users identify a consumer’s tariff. This included Payment Method, Region, Fuel Type, Import/Export, Tariff Type, Type of Use, Meter Type, MPxN and Grid Supply Point (GSP) Group Id.

130. A few respondents said that suppliers should be required to have unique tariff names.

⁹ This question relates to the access to public Tariff Pricing Data and is therefore equally applicable to Phase 1a and Phase 1b.

131. A few respondents suggested that the Tariff ID be codified so that it was able to convey the relevant information on the tariff e.g. Payment Method, Region and Fuel Type.

Government response

132. Government has carefully considered the responses provided and has also discussed updated proposals with the Tariff Interoperability Working Group (TIWG).

133. We agree that the provision of additional information is required to allow a TI User to more easily identify a consumer's tariff and associated Tariff Id so that it can send a request to a TI Energy Supplier for the tariff details.

134. We have updated the design (see TI API Technical Specification and Energy Market Data Specification (EMDS) in Annex D) to enable the TI User to filter the request for the list of tariff names and associated Tariff Ids using the following data items:

- Payment Method – allows a TI User to narrow the search if it is aware of a consumer's payment method, e.g. Direct Debit, Prepayment etc,
- Local Distribution Zone (LDZ) Region – allows a TI User to use a gas consumer's location to return tariffs that are applicable to that location. This data item has been created to replace the generic Regions data item. This approach allows the LDZ Region to be used for gas tariffs and the GSP Group Id to be used for electricity tariffs, see below.
- GSP Group Id – an additional data item that allow a TI User to use a consumer's location to return electricity tariffs that are applicable to that location.
- Fuel Type – allows a TI User to separate requests for electricity and gas tariffs, and
- Import/Export - allows a TI User to separate requests for import and export tariffs.

135. In addition to adding the ability to filter requests, we have amended the information that a supplier will be required to provide in its response to TI Users on the list of applicable tariffs and Tariff Ids.

- In addition to the data items noted above, which have been included for the reasons given, we have included Meter Type. Meter Type would allow a TI User to distinguish between tariffs based on the metering in situ. For example, where a specific tariff is restricted to consumers with a smart meter, or until the roll-out of smart metering is completed, if the tariff was specifically linked to legacy metering, such as an Economy 7 tariff. This data item is conditional, so that a supplier would only be required to provide it if a tariff is restricted to a certain meter type(s).
- At this stage, we have not included a data item within the initial response to signify the Type of Use. While we have extended the scope of the API to capture Type of Use tariffs, e.g. where there is a separate unit rate at a metering point for Electrical Vehicles (EV), this has been reflected within the detailed Tariff Pricing Data rather than the initial Get Tariffs Response. Within the detailed Tariff Pricing Data, we have included a new Type of Use data item, with a free text field for suppliers to describe the specific circumstances rather than creating a discrete set of Type of Use enumerations. If a stable set of enumerations for Type of Use becomes evident, then this could potentially be added as a future enhancement to aid the discovery of a consumer's tariff name and Tariff Id.

136. We do not propose to require suppliers to ensure that their tariff names are unique or to define a standard format for Tariff Ids to provide information on tariff characteristics. We consider that this would be complex to implement, design and maintain and have no obvious advantages over our proposal to increase use of the data items noted above, to identify a consumer's tariff name and associated Tariff Id. Each supplier is responsible for defining the format and content of its own Tariff Ids and shall ensure that, when combined with its Market Participant Identifier (MPID), these uniquely identify each set of Tariff Pricing Data.

Q11: Our assumption is that certain suppliers may have more complex tariff arrangements which mean that additional information (e.g. Meter type), beyond Tariff Name and Postcode, will be required for a TI User to determine a consumer's correct Public Tariff Pricing Data. We anticipate that it may be difficult for consumer to provide this

additional information. Do you therefore agree that it is reasonable that consumers who have tariffs with these suppliers will only be able to optimise their ESA by providing consent to the RTI User to access their Consumer Specific Tariff information? ¹⁰

Summary of responses

137. There were 16 responses to this question with the majority agreeing that it would not be possible to identify complex tariffs using tariff name and postcode. Based on the proposed design, most respondents agreed that it was reasonable, for consumers with complex tariffs to provide consent to an RTI User to access Consumer Specific Tariff Information.
138. However, several respondents said that the use of this route should be minimised and that, where possible, tariffs should be identifiable through the public route.
139. As noted for Q10, a few respondents said that suppliers should be required to have unique tariff names.

Government response

140. Government has listened to feedback from consultation respondents and increased the data that a supplier is required to provide within the public Tariff Pricing Data. These changes are described in Government's response to Question 10 above. We consider that these changes will help TI Users to identify a consumer's tariff and associated Tariff Id, so that they can then request the relevant tariff details.
141. We recognise that, for some complex tariffs, it may still not be possible to identify a consumer's tariff name and associated Tariff Id. To support optimisation in these circumstances, Government will consult later this year on Phase 1b of the TI project to facilitate RTI User access to Consumer Specific Tariff Information where a consumer has provided consent. This process will require a supplier to provide a RTI User with a consumer's tariff Id associated

¹⁰ This question is closely related to Question 10 above. Whilst the question was linked to access to Consumer Specific Tariff Information, the changes identified through Question 10 means the Government response is equally applicable to Phase 1a and Phase 1b.



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with their specific MPxN, enabling the RTI User to request the consumer's specific Tariff Pricing Data.

Draft TI API Technical Specification and Energy Market Data Specification (EMDS) Changes

Our November 2025 consultation sought views on the Draft TI API Technical Specification and Energy Market Data Specification (EMDS) Changes. In this section we summarise responses to those questions and set out the government's final position.

Overview:

142. Government and RECCo consulted on the proposed draft TI API Technical Specification and proposed updates to the EMDS. The API Technical Specification sets out how Suppliers would expose tariff data, including the structure of endpoints, request and response formats, and the types of tariffs that need to be supported (for example, static and time-of-use tariffs). The proposed EMDS updates introduce the supporting data items and market messages needed to enable this exchange, ensuring that tariff data is consistent, standardised, and suitable for use in optimisation. Together, these are intended to ensure that tariff data is provided in a consistent and usable format, so that TI Users can reliably access and use it for optimisation within the MVP scope.

Q12: Do you have any comments on the proposed TI API Technical Specification?¹¹

143. There were 17 responses to Question 12.

Summary of responses linked to Phase 1a requirements

144. The most common theme raised by respondents related to gaps in the tariff structures that the specification could represent. Several respondents noted that the API could not adequately capture tariffs that differentiate rates by day of the week (for example, weekend versus weekday rates), consumption bands (where the unit rate varies based on the volume of energy consumed), or type-of-use rates (for example, dedicated rates for EV charging or heat pumps). A few respondents also raised that the specification could not represent seasonal or monthly rate variations.

¹¹ As all market messages are new for TI, they have been given the reference 'MMXXX[n]'. Following consultation and inclusion in the EMDS, a formal reference will be assigned.

145. Several respondents raised concerns about the technical precision and quality of the specification, noting areas of ambiguity or inconsistency including: discrepancies between the date and time formats described in the supporting documentation and those defined in the OpenAPI specification; the absence of an explicit time zone declaration for time values; and inconsistency between the JSON and YAML formats in which the specification was made available. A few respondents requested that the specification be made available as a YAML/OpenAPI document rather than, or in addition to, a PDF.¹²
146. Several respondents identified specific errors within the EMDS Data Item Catalogue and Market Messages Catalogue, including incorrect logical and physical field lengths for decimal and percentage-based data items, and inconsistencies between data item lists and the message structure tables for a number of market messages.
147. Several respondents also raised comments on additional data items and schema enhancements. Suggestions included support for payment method and fuel type as arrays to reflect dual-fuel or multi-payment-method tariffs, inclusion of a currency field and tariff unit enumeration to support future extensibility, and the ability to distinguish between tariffs that are no longer available to new customers but remain active for existing customers.
148. A few respondents raised concerns about the handling of time zone and datetime formats, particularly the risk of ambiguity between Coordinated Universal Time (UTC) and local time for static tariff rate window times, and the need for explicit guidance to ensure consistent implementation across suppliers.
149. A few respondents also raised questions about the overlap between the proposed TI arrangements and the Radio Teleswitch (RTS), requesting explicit guidance on whether smart and RTS Time of Use tariffs are captured within scope.

¹² JSON (JavaScript Object Notation) and YAML (YAML Ain't Markup Language) are both machine-readable data formats commonly used to define API specifications. OpenAPI is an industry-standard framework for describing REST APIs, typically authored in YAML or JSON, which developers can use directly to implement or validate against a specification.

150. One respondent recommended that the specification be aligned with existing or emerging European Union (EU) interoperability standards to support cross-border compatibility.

Summary of responses linked to Phase 1b requirements

151. A few respondents raised concerns about the completeness of the HTTP error response codes, noting that the specification only defined a 404 response for the scenario where a MPxN is unknown, or customer consent has not been granted. A few respondents raised concerns about data integrity and validation, noting that without a mechanism to triangulate or validate meter point and address data, there was a risk of a TI User receiving tariff information applicable to a different consumer.

152. Several respondents raised comments relating to consent, webhook notifications and the provision of Consumer Specific Tariff Information, including concerns about the long-term alignment between the bespoke TI consent design and the CCS, and questions about the Open Authorization (OAuth) flow. These elements relate to the Phase 1b requirements.

Government response linked to Phase 1a requirement

153. In response to feedback on the tariff structures that the specification can represent, government has extended the scope of the TI API Technical Specification to include Time of Use tariffs that differentiate based on days of the week. Time of Use tariffs differentiated by days of the week are not exempted under Electricity Supply SLC 11C, and TI Energy Suppliers will be required to provide these tariffs when requested by TI Users. Government has not extended the specification to support seasonal or monthly rate variations at this stage, as sufficient evidence has not been provided to demonstrate that this is necessary for the MVP. Also, based on industry feedback, type of use has been included to provide flexibility for the range of use cases across the industry. Block tariffs have been added, but provision is optional as per Electricity Supply Licence SLC11C.

154. Government confirms that all timestamps within the TI API Technical Specification are standardised to UTC¹³. For static tariff rate windows, where time-only values are used rather than full datetime values, the EMDS has been updated to confirm that Local Time should be used. In practice, this means that if a supplier markets a Time of Use tariff with a cheap rate from 00:00–07:00, the API will reflect those times exactly as advertised to the consumer, in local clock time, rather than requiring conversion to or from a different time standard. This ensures consumers can trust that the times shown in apps and smart devices match the times on their tariff. Government will also ensure that the specification is published in YAML/OpenAPI format to support supplier and TI User build activities.
155. Government has reviewed the EMDS Data Item Catalogue and Market Messages Catalogue in light of the specific issues identified by respondents. Amendments have been made to the EMDS, including updates to logical and physical field lengths for percentage-based data items and corrections to data item lists and message structure tables for affected market messages. The updated EMDS is included within Annex D. Further detail is set out in government's response to Question 13.
156. In response to feedback on additional data items to be included in the Get Tariffs Response, government has updated the specification to include the data items described in government's response to Question 10, including Payment Method, LDZ Region, GSP Group Id, Fuel Type, Import/Export and Meter Type. Government notes the feedback on further potential additions including currency, tariff unit, commodity type and the distinction between tariffs no longer available to new customers and those that remain active.
157. An RTS exclusion is not required to be included in the licence or the REC, as RTS is planned to be switched off in Summer 2026, ahead of TI implementation, and so there should not be many remaining consumers on RTS tariffs left.
158. Government notes the feedback on alignment with EU interoperability standards and will consider this in the context of future iterations of the specification.

¹³ In accordance with RFC 3339, and that the Z suffix is required on all datetime values.

Responses Linked to Phase 1b Requirements

159. Government acknowledges the feedback on Hypertext Transfer Protocol (HTTP) error response codes and the position is that we are using a single error code so that we are not giving away information on which potential MPxN's exist or do not exist. Government also acknowledges the concerns raised regarding data integrity and validation, and considers that the proposed arrangements address these through a layered set of controls. Format and conformance of all messages exchanged through the TI API are enforced through the API Technical Specification (Annex E) and the Energy Market Data Specification (Annex F), which together define the mandatory and conditional data items, permissible values, and message structures with which supplier must comply. Government notes that the role of the TI Arrangements is to standardise the format, availability and exchange of tariff data, rather than to verify the underlying commercial accuracy of the prices published by suppliers. Accuracy of the tariff information remains a matter for the supplier under their existing Supply Licence obligations, with Ofgem retaining its established enforcement role in this area. Government considers this delineation to be appropriate, as it keeps the TI Arrangements focused on interoperability while preserving the existing accountability framework for retail pricing.
160. Government considers that mandatory data triangulation mechanisms are not required at the MVP stage, as Consumer Specific Tariff Information will be agreed through the customer logging into their supplier account, which will clearly link the request to the relevant MPxN.
161. Elements raised by respondents relating to Phase 1b requirements — including the long-term alignment between the TI consent design and the CCS, and the OAuth flow for In Home Display (IHD) devices — will be considered as part of the dedicated working group sessions for TI and CCS integration that government proposes to establish, and will be consulted on as part of the Phase 1b proposals later in 2026. .

Q13: Do you agree that the proposed changes to the Energy Market Data Specification (EMDS), detailed in the Data Item Catalogue and

Market Messages Catalogue are all required for optimisation and in line with the MVP scope? ¹⁴

Summary of responses

162. There were 16 respondents to question 13, with the majority of respondents agreeing that the proposed changes to the EMDS are required for optimisation and align with the MVP scope. A few respondents disagreed, primarily on whether all proposed data items are necessary for optimisation. Several respondents raised clarification points and technical queries, particularly in relation to data definitions, schema design, and implementation detail.

Summary of responses linked to Phase 1a requirements

163. Several respondents agreed that the proposed EMDS changes were required for optimisation and in line with the MVP scope, with some noting that the changes reflected a consistent approach to bringing together the relevant data items across multiple codes.

164. The most common theme was the identification of specific errors and gaps within the Market Messages (MM) Catalogue. Several respondents raised a number of issues including: the absence of request messages with empty payloads from the EMDS, which have now been added; the need for greater differentiation in the use of TI User and RTI User as target and source designators across several message scenarios.

165. Several respondents identified precision errors within the Data Item Catalogue, including data type and format mismatches between the catalogue and the OpenAPI specification, insufficiently constrained field definitions, and unit price precision being limited to whole pence when optimisation use cases may require sub-penny granularity.

166. Several respondents raised questions about specific data items. In particular, respondents sought clarification on whether the Tariff (Id) was intended to incorporate tariff characteristics such as location and payment method as

¹⁴ As all market messages are new for TI, they have been given the reference 'MMXXX[n]'. Following consultation and inclusion in the EMDS, a formal reference will be assigned.



components, and whether the Tariff Name was required to match the name visible to the consumer on their bill and other communications. Respondents also questioned why the MPID had been used in place of the supplier name, noting this may not be meaningful to consumers.

167. Several respondents sought clarification on the rationale for having separate static and dynamic tariff effective date fields, with some suggesting a unified approach could be used. The addition of a days of week field to the Data Item Catalogue was requested by several respondents, consistent with feedback provided in response to Question 12. One respondent questioned whether the Percentage Green data item was necessary as a dedicated field, suggesting it could instead be captured within the existing tariff comments free text field.

168. One respondent did not agree that all data items were required for optimisation, noting that standing charge rates and selling dates do not directly influence the cost of operating an ESA at different times of day, and that tariff effective dates are consumer-specific and would only be obtainable via the Consumer Specific Tariff Information route.

169. Several respondents noted that it was difficult to clearly identify which parts of the EMDS represented new additions and called for clearer definitions for new data items to avoid interpretation differences across suppliers. A few respondents noted that the proposals focused primarily on flexibility service providers, with limited recognition of use cases for in-home displays, heating systems, battery storage and original equipment manufacturer (OEM) platforms. These respondents recommended the introduction of an explicit indicator to signal whether meter-resident pricing is being actively maintained or whether pricing should be sourced via the TI API.

Summary of responses linked to Phase 1b requirements

170. A few respondents also raised concerns about security in relation to MMXXX8¹⁵, noting that the ability to send a high volume of requests using MPxN values and infer supplier relationships from 404 responses presented a potential for misuse, and recommending that the source for this message be restricted to RTI Users only.

¹⁵ GET MPxN Tariff Details Response

171. Several market messages relating to consent revocation, supplier change notifications and supplier cessation notifications were noted as relating to Phase 1b requirements. In particular, one respondent highlighted that the supplier cessation notification (SSZZZ15) introduces significant complexity for an MVP, noting that such notifications would need to cover both individual MPXN-level events and broader scenarios — such as a Supplier ceasing to be a voluntary TI Supplier or discontinuing voluntary TI features (e.g. sharing gas or export tariff data) — even where an RTI User has no current customers with that Supplier.
172. One respondent raised the need for a central trust mechanism to govern how a supplier issues OAuth credentials to an RTI User, noting this was not addressed in the EMDS or the API Technical Specification.

Government response linked to Phase 1a requirements

173. Government has reviewed the Data Item Catalogue in response to the precision errors identified by respondents. Corrections have been made in the EMDS (which contains the Data Item Catalogue) in Annex D. These corrections include updates to data type and format definitions to ensure alignment with the OpenAPI specification, the introduction of minimum and maximum length constraints for identifier fields, and increased unit price precision to ensure sub-penny granularity is supported where required for optimisation use cases.
174. In response to feedback on the days of week field, government confirms that this field has been added to the Data Item Catalogue and the relevant market messages to support Time of Use tariffs that differentiate rates by day of the week, consistent with the extension to the TI API Technical Specification described in government's response to Question 12.
175. Government acknowledges the questions raised on the Tariff Id and Tariff Name data items. Government does not propose to require suppliers to structure Tariff Ids to incorporate specific tariff characteristics, as set out in government's response to Question 10. Government will provide guidance to clarify that the tariff name returned via the API should be recognisable to the consumer and consistent with other supplier communications, including billing, to avoid consumer confusion.

176. Government has updated the TI arrangements so that TI Users are provided with the company name of each supplier participating in the TI arrangements as well as the supplier MPID. This information will be returned as part of the API request for the list of supplier endpoints from the TI Supplier Register. We agree that including the supplier's name avoids the need for TI Users to check the REC Party Register to identify which supplier is associated with an MPID. We note that the name of the company that holds the supply licence, which is the information recorded by RECCo in the REC Party Register, may not always correspond directly with the company's trading name.
177. Government considers that the separate static and dynamic effective date fields are necessary to reflect the structural difference between static and dynamic tariff rate windows and will provide additional guidance in the specification to explain this design decision. Government acknowledges the feedback from one respondent on the Percentage Green data item and will keep its inclusion under review through the TIWG, but proposes to retain it at this stage.
178. Government notes the feedback that standing charge data and selling dates may not be strictly required for optimisation. Government maintains that these data items support a complete and consistent representation of tariff information within the TI arrangements and are proportionate within the MVP scope.
179. Government notes the feedback from respondents on the importance of broader use cases including in-home displays, heating systems and storage platforms. We note that this is not within the current scope of the TI proposals and is therefore not being progressed as at this stage. It could be considered in the future, for example by raising a REC change using the REC change management process.
180. Government welcomes the broad agreement from respondents that the proposed EMDS changes are required for optimisation and are in line with the MVP scope. In line with the phased delivery approach set out in the executive summary, the EMDS changes have been split to reflect Phase 1a elements, covering the provision of public Tariff Pricing Data.

Government response linked to Phase 1b requirements

181. In line with the phased delivery approach, Phase 1b EMDS elements will be consulted on later in 2026. Phase 1b elements include data items and market messages relating to consent revocation, supplier change notifications and supplier cessation.
182. Government has reviewed the MM Catalogue in light of the specific errors identified by respondents, and we have made the corrections and the updated EMDS will be in an Annex, including addressing the typographical error in MMXXX2¹⁶ and the omission of MMXXX4. Government will also review and clarify the use of TI User and RTI User designators across message scenarios to ensure consistency. Government acknowledges the concern about MMXXX8 and the potential for misuse through high-volume MPxN enumeration requests and will consider restricting the source for this message to RTI Users as part of the Phase 1b design.
183. Government notes the feedback on the need for a central trust mechanism and good technical practices which will be part of the CCS development work for RTI Users and will address this as part of the TI and CCS integration design to be developed through the dedicated working group sessions proposed in the executive summary.

¹⁶ Returns Registered TI Users by MPID

Draft Standards Definition Document

Our November 2025 consultation sought views on the Draft Standards Definition Document. In this section we summarise responses to those questions and set out the government's final position.

Overview:

184. The Standards Definition Document is a REC governed artefact which defines the common standard for documenting all relevant industry data and messaging, associated with several different physical messaging standards. In the Government and RECCo consultation, views were requested on minor changes to the Standards Definition Document. These were considered necessary to incorporate the new standards required to facilitate sending and receipt of TI APIs.

Q14: Do you have any comments on the proposed redline changes to paragraphs 2.11 and 2.14 of the Standards Definition Document set out in Annex F?

Summary of responses

185. There were 11 responses on this question. the majority of respondents supported the proposed changes or said that they have no comments.

186. One respondent suggested that 'RTI User' be added to the list of Market Data Service Abbreviations to that they can send and receive Market Messages and noted that only TI Users had been added.

Government response

187. Government welcomes the support for the proposed changes to the REC Standard Definitions Document.

188. We have made some minor changes to the drafting to align with the defined terms that will be used in the REC. The updated Standards Definition Document is set out in Annex E.



Department for
Energy Security
& Net Zero

189. We agree with the respondent that suggested that RTI User be added to the list of Market Data Service Abbreviations. As this is only required to support Phase 1b, we propose to consult on implementing this change, alongside the other required changes for Phase 1b later in 2026.

Implementation Timeline

Our November 2025 consultation sought views on the proposed implementation timeline. In this section we summarise responses to those questions and set out the government's final position.

Overview:

During the consultation, Government and RECCo sought views on the proposed implementation approach and timeline for delivering the TI arrangements. This included key milestones covering regulatory changes (Electricity Supply Licence Conditions and Retail Energy Code updates), development of technical artefacts (API Technical Specification and Energy Market Data Specification), and industry readiness activities such as testing, onboarding, and go-live support.

The proposed approach set out a structured sequence of activities from consultation through to implementation, including build and test phases, end-to-end testing, onboarding of Suppliers and Registered TI Users, and early life support following go-live. It also outlined dependencies on wider programme elements and the need to align delivery with supplier readiness and system integration constraints.

Q15: Do you have any comments on the overall implementation approach and timeline set out in this annex, including the implementation date of 01 January 2027?

Summary of responses

190. There were 17 responses to this question, with the majority of respondents supporting the overall direction of TI and recognised the role of common standards and governance arrangements in enabling consumer-led flexibility and future smart energy services.

191. Several respondents raised concerns regarding the feasibility of the proposed implementation timeline. In particular, respondents highlighted the short period between finalisation of the API Technical Specification and the proposed implementation date of 01 January 2027, noting that this created delivery risk for suppliers responsible for implementing the solution.

192. Several respondents indicated that they would require additional time following finalisation of the technical specification to complete development and testing activities. Respondents also highlighted overlapping delivery pressures from other major industry programmes, including MHHS and the CCS.
193. Several respondents raised specific concerns regarding the proposed 01 January 2027 implementation date, noting that it falls on a Bank Holiday and coincides with a period in which many suppliers operate change freezes.
194. Several respondents proposed alternative approaches to mitigate delivery risk. The most common suggestion was a phased implementation approach, separating the delivery of public Tariff Pricing Data from Consumer Specific Tariff Information, allowing the public route to be delivered first while the more complex consent-based elements were delivered later. Some respondents also suggested aligning the consent elements of TI with the CCS to avoid duplication of infrastructure.
195. Other suggestions included extending the post-go-live transition period or aligning implementation milestones more closely with wider industry change cycles.

Government response

196. Government welcomes the broad support from respondents for the overall direction of TI and the role of common standards and governance arrangements in supporting consumer-led flexibility and future smart energy services.
197. Government acknowledges the concerns raised by respondents regarding the feasibility of the original implementation timeline, particularly the short period between finalisation of the API Technical Specification and the proposed implementation date of 01 January 2027.
198. Government notes that these concerns were raised primarily by suppliers responsible for implementing the solution, with respondents highlighting the delivery challenges associated with overlapping industry programmes including MHHS and CCS.
199. Government also acknowledges the operational concerns raised regarding the proposed 01 January 2027 implementation date, including the fact that this date

falls on a Bank Holiday and during a period in which many suppliers operate change freezes.

200. As described in the executive summary, Government has considered consultation feedback and revised the implementation approach in order to reduce delivery risk and better align TI with the development of the Consumer Consent Solution.

201. Government will therefore introduce TI through a phased implementation approach, as this supports supplier readiness and reduces the risk of delivery delays by allowing suppliers to build and implement the solution in a more manageable and structured way.

202. Government notes that the API Technical Specification will be baselined in May 2026, giving suppliers a stable reference point for development. After this point, changes will be limited to defect fixes and essential updates, ahead of finalisation following a short consultation in Q3 2026.

203. Under this revised approach, phase 1a, which allow access to public Tariff Pricing Data will be introduced into the REC in May 2026 and implemented in February 2027, allowing additional time for industry preparation and avoiding the operational challenges associated with the previously proposed January implementation date.

204. Phase 1b, which will introduce requirements to share Consumer Specific Tariff data, will begin development in Q1 2027. This timeframe is required in order to enable alignment to CCS. Phase 1b will be consulted on further in due course however is anticipated to go live in November 2027.

205. Government considers that this revised implementation approach provides a more proportionate balance between delivering the benefits of TI at pace and ensuring that implementation remains realistic and deliverable for industry participants.

206. Government's policy objective for TI remains unchanged; however, the delivery sequencing and implementation timing have been adjusted in response to consultation feedback, as described in the executive summary.

Q16: Do you have any comments on the high-level test approach set out in paragraphs 25-28?

Summary of responses

207. There were 12 responses to this question, with the majority of respondents generally supporting the proposed testing approach, including the use of sandbox environments and end-to-end testing, recognising these as important safeguards for ensuring interoperability between suppliers and TI/RTI Users.

208. A few respondents raised concerns that the proposed testing timelines may be too compressed, given the complexity of integrating new APIs into supplier systems.

209. Several respondents requested greater clarity on testing scenarios and artefacts, including coverage of non-domestic and more complex tariff use cases.

210. Several respondents highlighted the importance of sandbox testing to enable early integration testing and identification of technical issues prior to implementation.

211. A few respondents suggested that detailed testing arrangements should be developed collaboratively with industry and indicated a preference for proportionate and largely voluntary participation in testing activities.

Government response

212. Government welcomes the general support for the proposed testing approach, including the use of sandbox environments and end-to-end testing.

213. Government acknowledges concerns raised regarding testing timelines. As described in the executive summary, The revised phased implementation approach improves overall deliverability and allows sufficient time for testing, supporting a more robust and reliable rollout.

214. As a result of the revised phased implementation approach, the detailed testing arrangements will also be refined and baselined following the May 2026 Implementation Working Group (IWG).

215. Further detail on testing scenarios, artefacts and participation arrangements, including an update to the high-level testing and delivery timeline, will therefore be developed collaboratively with industry through the IWG, focusing on Phase 1a, in May 2026. Development of the design and testing approach for Phase 1b will come later in 2026.

216. Government will take into account the feedback received through this consultation when developing the detailed testing approach to ensure that testing remains proportionate and aligned with the scope of the Minimum Viable Product (MVP).

Q17: Do you consider that an implementation working group should be established to support technical discussions on testing artefacts, defects and proposed design changes? If yes, please provide any additional information on the scope and membership of this group as well as when it should be established.

Summary of responses

217. There were 15 responses to this question, with all respondents showing support for establishing an Implementation Working Group to support delivery of the TI arrangements.

218. Several respondents suggested that membership should include a broad range of stakeholders, including energy suppliers, TI/RTI Users, ESA manufacturers and technical specialists.

219. A few respondents highlighted the importance of establishing the group early in the implementation process, noting that this would support readiness activities, end-to-end process walkthroughs and practical implementation planning.

220. A few respondents raised concerns that the group should avoid duplicating existing industry forums and should have a clear remit covering implementation readiness and technical delivery matters.

Government response

221. Government welcomes the strong support from respondents for establishing an Implementation Working Group.
222. Government agrees that a dedicated forum will support effective implementation by enabling technical collaboration, issue resolution and shared understanding of the implementation requirements.
223. The Implementation Working Group will provide a structured forum for industry participants to discuss testing artefacts, defects, implementation issues and any required design clarifications.
224. In light of the revised phased implementation approach, the group will also support discussions relating to the delivery of both phases of TI with an initial focus on Phase 1a, including coordination with the CCS where appropriate.
225. Government agrees that membership should include a broad range of relevant stakeholders, including suppliers, TI Users, RTI Users (for Phase 1b) and other technical participants.
226. RECCo will establish and facilitate the Implementation Working Group and will ensure that its remit remains focused on supporting practical implementation and delivery readiness.

Q18: Please confirm if you would be interested in voluntary participation in end-to-end testing as either a Supplier or RTI User. While we have proposed an obligation on Suppliers to support implementation through end-to-end testing in the REC TI Arrangements Schedule [see paragraph 1.5(d) in Annex D], our preference is to work with a small number of volunteer Suppliers.

Summary of responses

227. There were 16 responses to this question, with the majority of respondents supporting the principle of voluntary participation in end-to-end testing, recognising that early participation could help identify implementation issues and improve the robustness of the solution prior to go-live.

228. Several respondents, particularly TI/RTI Users, indicated an interest in participating in testing activities where feasible.
229. Some respondents highlighted that supplier participation may be constrained by resource pressures, competing programme delivery and uncertainty regarding implementation timelines.
230. Several respondents suggested that testing participation would be more practical once technical specifications and expectations are clearly defined.
231. A few respondents noted that voluntary participation should remain proportionate and flexible, recognising that not all parties may be able to commit to testing activities.

Government response

232. Government welcomes the general support for voluntary participation in end-to-end testing, recognising that early engagement from industry participants can help identify and resolve issues prior to implementation.
233. Government acknowledges that supplier participation may be constrained by competing programme pressures and implementation timelines.
234. Government therefore intends to take a primarily voluntary approach to end-to-end testing, encouraging participation from suppliers, TI Users and RTI Users (only required for Phase 1b) where possible, as this provides flexibility for suppliers, reflects varying levels of readiness across the market, and reduces the burden on those not yet in a position to participate.
235. The detailed testing approach, including the scope of end-to-end testing activities, will be developed collaboratively with industry through the Implementation Working Group.
236. As set out in the REC TI Arrangements Schedule, Government will retain the ability to require supplier participation if necessary to ensure sufficient testing coverage and interoperability assurance prior to implementation.