




CCS Design Consultation Webinar

Q&A Document

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This document provides responses to questions raised during the CCS Design Consultation Webinar held on 28 May 2026.

The webinar formed part of RECCo's ongoing engagement on the development of the Consumer Consent Solution (CCS), which is being designed to provide a consistent, secure and trusted framework for consumers to grant, manage and withdraw consent for access to their energy data.

The questions and responses in this document are intended to support stakeholder understanding of the current design direction and provide additional clarification on topics discussed during the webinar. As CCS remains in the detailed design phase, some aspects of the solution continue to be developed and refined. Where appropriate, responses identify areas that will be subject to further stakeholder engagement, consultation and REC drafting activity.

Stakeholder feedback remains an important part of the CCS design process, and RECCo welcomes continued participation through working groups, consultations and bilateral engagement as the programme progresses.

1. It's stated that this solution is ONLY being developed for the domestic market. Will RECCO publish a completely different type of consultation when considering the non-domestic market, and will you ensure that you engage with TPIs and customer representatives as soon as applicable?

A: The initial CCS delivery is focused on the domestic market. RECCo recognises that the non-domestic market encompasses a wide range of customer types and operating models, each with different legal, operational and data-sharing considerations. Engagement with non-domestic stakeholders, including TPIs, suppliers and consumer representatives, will be essential to understanding these requirements and informing any future expansion of CCS. RECCo intends to undertake dedicated consultation and engagement activities before any decision is made regarding the extension of CCS to the non-domestic market.

2. Can suppliers still provide data directly to either the consumer or ATP, or will they be required to go through CCS?

A: CCS is being developed as a consent-management solution rather than a central repository for energy data. Energy data will continue to be held by the relevant data holders. RECCo is currently developing the detailed design to determine how CCS will interact with existing supplier processes, SEC arrangements and other data-sharing mechanisms. CCS is not intended to prevent suppliers from meeting existing regulatory, legal or statutory obligations relating to data access and sharing. Further detail will be provided through the summer REC drafting consultation.

3. How will ID&V work when most domestic customers don't even know what an MPxN is, and they no doubt need to provide it to link to the data?

A: We agree that consumers should not be expected to understand industry terms such as MPxN in order to use CCS. A key part of the design work is to make the journey simple and intuitive, so that consumers can identify or confirm the relevant premises in a way that feels familiar to them, without having to identify their MPxN. We are exploring how address matching, Enquiry Services and clear customer messaging can support this. The objective is that consumers can complete the consent journey using information they already know, rather than needing to understand industry identifiers or market processes.

4. When will be able to see what the solution looks like - what customers will see and how they will interact with it?

A: RECCo is continuing consumer research and user-experience (UX) design activities to understand how consumers will interact with CCS. This includes testing key elements of the customer journey, such as identity verification, premises association, consent management, confirmation messages and trust indicators. This work is being undertaken with specialist UX support and informed by engagement with consumer representatives. Further information on the proposed customer journey, Customer Experience Guidelines and operational processes will be shared through future engagement activities and the summer REC drafting consultation.

5. What will be in MMP?

A: The Minimum Marketable Product (MMP) represents the initial phased delivery of CCS and is focused on establishing a secure, scalable and implementable consent solution for the domestic market. It is not intended to deliver every future CCS capability from day one. As detailed design progresses, RECCo will continue to review the MMP scope, including Energy Data Holder participation and adoption pathways, while also considering opportunities to deliver early benefits where these do not compromise delivery confidence. The future CCS roadmap will describe how the solution may evolve beyond the initial implementation

6. What will happen if the consumer does not consent to their data/info being part of CCS?

A: CCS is built around consumer choice. If a consumer does not give consent, CCS would not authorise the relevant data-sharing request. The consumer's decision will not prevent access to data where another lawful basis applies outside the CCS framework. Consumers will need to understand what they are being asked to agree to, who is requesting access, and what data is involved. The detailed rules for consent capture, refusal, expiry and withdrawal will be developed through the lower-level design and REC drafting.

7. Why would a SEC Other User participate in CCS?

A: CCS is intended to provide consumers with a consistent, trusted and transparent mechanism for granting and managing consent. For SEC Other Users, participation may reduce the need to maintain separate consent-management processes and support a more standardised customer experience across the market. We are working with SECCo to understand how CCS can align with existing SEC arrangements and whether it can help reduce the regulatory burden, including assurance and privacy audit requirements, where consent is obtained through CCS.

8. As a SEC Other User, we already provide services to non-domestics. When do REC intend to include Non-Doms?

A: The initial CCS delivery is domestic. RECCo recognises the importance of the non-domestic market and the fact that many SEC Other Users and TPIs already support non-domestic customers. However, the non-domestic market includes a broad range of premises and customer types, with different legal, operational and identity-verification considerations. RECCo will consider non-domestic expansion as part of the future CCS roadmap and will establish specific engagement with non-domestic stakeholders when scoping begins.

9. Will CCS apply within the domestic property management sector, ie, where Managing agents manage the energy requirements for communal areas in a block of flats on behalf of the tenants/leaseholders? If so, how will consent be achieved if there are potentially 100s of tenants that are the 'consumers'?

A: We recognise that property management and multi-occupancy arrangements present additional complexity and require further consideration. Consultation feedback highlighted important questions regarding who should be able to provide consent where occupiers, bill payers, landlords, managing agents and communal supplies are involved. RECCo's current position is that CCS consent should be provided by the occupier rather than a

landlord or managing agent acting on their behalf. However, communal supplies serving large numbers of residents may present different considerations from an individual domestic supply. For example, where energy consumption relates to shared facilities used by a large number of people, it may be less likely that the data can be linked to, or reveal information about, a particular identifiable individual.

RECCo is continuing to work with its legal advisers and engage with the ICO to better understand how these scenarios should be treated. We will set out our proposed position in the summer consultation.

10. The enquiry services address data is unreliable. What will the solution to that be?

A: We recognise the concern. Accurate address matching is important to the CCS journey, and the potential impact on identifying the correct MPxN. Address-data quality is already subject to targeted assurance activity, and the CCS team is working with RECCo colleagues to understand the impact of that wider activity on CCS arrangements. The ID&V and MPxN association journey will continue to be refined so that the consumer experience is usable, while maintaining appropriate assurance.

11. When will the high-level design be presented?

A: The CCS Design Consultation set out high-level design positions across policy, technical design, user experience, governance and the future roadmap. In line with our overall design principles, RECCo has procured an 'off the shelf' solution, rather than building a bespoke system, and we are relying on open standards, which minimises the design choices specific to CCS. The next stage is to develop the lower-level CCS design, operational artefacts and draft REC legal text. RECCo will continue engagement through working groups and bilateral discussions, focusing on configurable elements where optionality exists, before issuing the summer REC drafting consultation, which will set out proposed final positions, supporting rationale and areas where further views are requested.

RECCo would like to thank stakeholders for their participation in the CCS Design Consultation Webinar and for the constructive feedback received to date. Stakeholder input will continue to play an important role in shaping the detailed design of CCS. Further opportunities to engage will be provided through working groups, bilateral discussions and the forthcoming summer REC drafting consultation.

If you would like to discuss any aspect of the CCS programme, please get in touch at consumerconsent@retailenergycode.co.uk