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Tariff Interoperability

Bespoke Non-Domestic Contracts – Explanatory Note for Stakeholders

Purpose

This note explains the Government's approach to bespoke non-domestic electricity contracts within the Tariff Interoperability programme. It clarifies:

- which non-domestic contract types fall within the scope of the Tariff Interoperability arrangements;
- why bespoke contracts are treated differently from tariff-like contracts;
- what suppliers are required to make available under the Electricity Supply Standard Licence Conditions; and
- how bespoke contracts may be supported in future phases of delivery.

This note is intended to provide additional context alongside the Electricity Supply Standard Licence Conditions and help suppliers, third parties, and governance bodies understand the policy intent.

Executive Summary

The government has adopted a proportionate approach to bespoke non-domestic contracts within Tariff Interoperability.
Recognising the commercial sensitivity and implementation complexity associated with bespoke contracts, suppliers are **not required** to make these contracts available through the mandatory Tariff Interoperability arrangements.

Instead, suppliers are required to make available **standardised, tariff-like non-domestic contracts** that are offered to multiple customers in a similar way to domestic tariffs.

To provide clarity and consistency, a new definition of **Bespoke Charges** has been introduced into the Electricity Supply Standard Licence Conditions. This distinguishes genuinely bespoke contracts from tariff-like contracts and provides greater certainty over supplier obligations.

Phase 1A will deliver the public route to tariff information for consumers who know their supplier and tariff name. Phase 1B will introduce the private route, enabling consumers to consent to sharing their tariff information. While bespoke contracts remain outside the mandatory requirements, suppliers will be able to choose whether to make such information available via the private route.

Delivery Roadmap

Phase	Delivery
Phase 1A (February 2027)	Introduces a standardised Tariff Interoperability API allowing consumers who know their supplier and tariff name to access public tariff information.

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Phase	Delivery
Phase 1B (November 2027)	Introduces the private route, allowing consumers to consent to sharing Consumer Specific Tariff Information. Suppliers may voluntarily make bespoke contract information available through this route.
Future Phases	The government will review the policy position on bespoke contracts as part of Phase 2 development.

Background

During the early development of Tariff Interoperability, the Government recognised that requiring suppliers to publish all non-domestic contracts would create significant implementation challenges.
As outlined in the 2024 Smart Secure Electricity Systems (SSES) consultation, bespoke non-domestic contracts were expected to be excluded from the tariff data standard because they often contain commercially sensitive pricing arrangements and are individually negotiated.

The government also recognised that many bespoke contracts lack a standard tariff name, meaning they do not align with the original Phase 1 use case, in which consumers know their supplier and tariff name before requesting tariff information.

Through consultation and engagement with industry, the Government identified two broad categories of non-domestic contracts:

- **Bespoke contracts**, where charges are tailored to an individual customer based on factors such as business type, consumption profile or credit arrangements.
- **Tariff-like contracts**, where the same charging structure is made available to multiple customers irrespective of their individual circumstances.

This distinction underpins the policy approach adopted for Phase 1.

Why Bespoke Contracts Are Excluded

The government considers that requiring suppliers to publish bespoke contracts would create disproportionate implementation complexity while offering limited benefit during the initial phases of Tariff Interoperability.
Bespoke contracts often:

- contain commercially sensitive pricing information;
- are individually negotiated;
- may not have identifiable tariff names; and
- vary significantly between suppliers.

By contrast, tariff-like contracts can be published using the same principles as domestic tariffs, thereby supporting the objectives of Tariff Interoperability without introducing unnecessary complexity.
This approach enables consumer benefits to be realised while maintaining a proportionate implementation burden on suppliers.

Defining Bespoke Charges

To provide certainty for suppliers, the Government has introduced a new definition of **Bespoke Charges** within the Electricity Supply Standard Licence Conditions.

The licence defines bespoke charges as:

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"Charges for the Supply of Electricity that are tailored to the individual needs of a Customer being supplied by the licensee and that are not widely available on the open market…"

The definition also makes clear that the inclusion of a **Micro Business Third Party Intermediary (TPI) fee** alone does **not** make an otherwise standard tariff a bespoke contract.
In practical terms, this means suppliers are **not required** to publish contracts where pricing has been individually tailored to a customer's circumstances, but must continue to publish tariff-like contracts that are generally available to groups of customers.

What Suppliers Need to Make Available

Under the Electricity Supply Standard Licence Conditions, suppliers should:

- make available domestic tariffs and tariff-like non-domestic contracts through the Tariff Interoperability API;
- exclude genuinely bespoke contracts that meet the licence definition;
- continue to make export tariffs, including Smart Export Guarantee (SEG) tariffs, available; and
- note that Feed-in Tariff (FIT) arrangements are not required to be included.

The government has also included an exemption for suppliers whose non-domestic portfolios consist solely of bespoke contracts and other excluded contract types, such as deemed and out-of-contract arrangements.
Where suppliers believe the costs of implementing the API would be disproportionate, the licence conditions include provision for a derogation process.

Phase 1B and Future Opportunities

Although bespoke contracts are outside the mandatory requirements for Phase 1A, the private route introduced in Phase 1B will allow suppliers to voluntarily make such information available where they consider there is a commercial benefit.
The government recognises that bespoke contracts account for a significant proportion of microbusiness electricity contracts and acknowledges that excluding them from the mandatory arrangements may limit some potential flexibility benefits.

However, the government considers the current approach to be proportionate for initial implementation and intends to review the policy position as part of the development of Phase 2.

What Suppliers Should Do

Suppliers should now:

- identify which non-domestic contracts are tariff-like and therefore fall within scope;
- identify genuinely bespoke contracts using the licence definition;
- continue preparations for Phase 1A implementation in February 2027; and
- engage with Ofgem if they remain uncertain about whether particular contracts should be considered bespoke.

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As the regulator responsible for supplier licence compliance, Ofgem is best placed to provide assurance where interpretation of the licence conditions is unclear.

Further Guidance

The government considers that the current licence definition provides sufficient clarity to distinguish between bespoke and tariff-like contracts and to support the intended policy outcomes.
Where additional implementation guidance would assist industry, the Government is willing to work with relevant governance bodies and trade associations to develop supplementary guidance.