Product Roadmap

Consumer Consent Service

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Contents

1. Purpose and status of the roadmap

This annex sets out the current Product Roadmap for the CCS. It distinguishes the confirmed MMP and proposed REC baseline from development after MMP, giving industry a structured view of how the CCS may evolve while retaining enough context to be read independently of the main consultation.

The roadmap is directional, not a delivery plan. Inclusion in the roadmap does not commit RECCo or industry to delivery dates, sequencing or funding. Future scope will progress only where the relevant consumer or market need, evidence, policy and regulatory direction, funding, technical feasibility and implementation readiness support it. All will be subject to the REC Change Process, providing the required governance to the above.

The MMP is the first implementation of the wider CCS vision. It establishes reusable permission, trust, verification, authorisation, governance and assurance capabilities, initially applied to domestic half-hourly electricity metered data. The main consultation explains the phased approach, MMP scope and long-term CCS vision in section 3.2.

2. How to read the roadmap

2.1 Roadmap horizons and status

The roadmap uses three horizons and a separate Product Backlog:

- Now: the confirmed MMP and proposed REC baseline required for the initial implementation of the CCS.
- Next: the more developed candidates for post-MMP delivery. With the exception of Tariff Interoperability related items, these are not delivery commitments and remain subject to the relevant decisions and dependencies.
- Later: potential expansion requiring further evidence, design, readiness or policy, regulatory and governance decisions.
- Product Backlog: ideas that have been considered but are not currently prioritised within Now, Next or Later.

The horizon assigned to an item indicates its present maturity and relative position, not a delivery date. Items may move between horizons as evidence, dependencies and priorities develop.

3. Capability evolution roadmap

3.1 Product Pillar descriptions

Identity, Access and Verification: Establishes the identity and authority of the person interacting with the CCS, including authentication, identity assurance, occupancy or account relationships and property-to-meter-point matching.

Permission Lifecycle Management: Covers the creation, validation, review, renewal, revocation, expiry and evidencing of permissions and the grants and access tokens derived from them.

Consumer Portal and Experience, including CEGs: Covers how consumers grant, view and manage permissions and the accessibility, information and experience requirements applying to CCS-related journeys.

Ecosystem and Data Access Framework: Covers participant onboarding, the CCS Directory, Data Products, participant roles and the arrangements through which ATPs and EDHs take part in the CCS.

APIs and Authorisation: Covers the technical interfaces, security protocols, permission schema, token model and authorisation controls used for trusted CCS interactions.

Monitoring, Audit and Assurance: Covers audit records, operational monitoring, reporting and the evidence and controls used through REC performance assurance.

Platform Resilience and Operations: Covers service availability, capacity, recovery, incident management, support, testing and other operational requirements.

Governance and Trust Framework: Covers the REC rules, roles, qualification, assurance, enforcement and change arrangements that govern use of the CCS.

Communication, Transparency and Education: Covers the information and guidance needed by consumers and industry to understand the CCS and their responsibilities.

Cross-sector Interoperability and Future Data Capabilities: Covers potential extension to further datasets, participants, permission models and other trusted data-sharing arrangements.

3.2 Capability evolution roadmap

The matrix below sets out the current Now, Next and Later position for each Product Pillar. Next and Later items remain potential areas of development and are subject to the conditions explained in section 5.

Product Pillar	Now (MMP / REC Baseline)	Next (Enhancements & Adoption)	Later (Expansion & Future)
Identity, Access and Verification	• GPG45 Medium as the normal minimum identity outcome • Identity, address and current occupancy established as separate assurance outcomes • Multiple evidence routes; photographic ID optional, fallback or risk-based step-up • Centrally governed identity and occupancy verification with auditable evidence paths • UPRN-first electricity meter-point matching through the Electricity Enquiry Service where available • Verified CCS account required • Persistent verified CCS account supporting repeat permissions and permission management • Digital journey and domestic use case only	• Additional approved identity providers and reusable identity assertions • Assisted and non-digital verification routes • Wider SEC Other User participation where SEC arrangements enable CCS use • Account-holder verification for Tariff Interoperability Phase 1b	• Non-domestic verification models • Delegated-authority verification models • Federated identity alignment with other trusted schemes • Dataset-specific verification profiles for PSR, DCC, asset and other future use cases

Consent Lifecycle Management	• Permission management and authoritative CCS grant record • Permission Schema and Permission Purpose Catalogue governance • Grant, review, renew, revoke and permission-query processes • Short-lived, resource-specific access tokens derived from the grant • Permission expiry and authorised data periods, including limits based on the verified occupancy period. • New permissions only; pre-existing permissions excluded from MMP	• Tariff Interoperability permissions using an account-holder model • Address change and home mover permission management • Enhanced lifecycle notifications and operational learning	• Supplier consent migration and inclusion of pre-existing permissions • Non-domestic permission models • Permissions for behind the meter assets, asset control • Support for other lawful-basis schemes where enabled by the relevant code or regulatory arrangements
Consumer Portal & Experience (incl. CEGs)	• Verified consumer account and central Consumer Portal • Grant, renew, review, revoke and query journeys • Visibility of relevant active and historic CCS permissions • Consumer Experience Requirements for digital journeys through an ATP • WCAG 2.2 AA, layered information and plain-language requirements • Clear explanation of the MMP boundary and ATP/CCS roles	• Iterative CEG and journey improvements informed by research and live service insight • Assisted and non-digital journeys • Enhanced accessibility support and consumer communications • Consumer experience for Tariff Interoperability and additional datasets	• Cross-dataset consumer view as CCS coverage expands • Trusted third-party or interoperable portal experiences, subject to design and governance
Ecosystem & Data Access Framework	• CCS Directory for participants, applications, endpoints, roles, credentials and Data Products • Managed CCS User onboarding, qualification, testing and production registration. • SDR as the first Energy Data Holder • Domestic half-hourly electricity metered data first	• Tariff Interoperability Phase 1b as a later CCS phase • Additional SEC-governed data-sharing use cases • DCC System data for consumer portal visibility • Additional ATP, EDH and participant categories	• Gas consumption data and MPRN matching • PSR data • Behind the meter asset information and asset control • Direct DCC integration or DCC SMEDR participation if progressed • Non-domestic use cases and broader cross-sector participation

APIs & Authorisation	• FAPI 2.0 security baseline with mTLS sender-constrained tokens • PAR, RAR and OAuth 2.0 authorisation-code flow • Local EDH validation of signed JWT access tokens • Maximum 30-minute access-token lifetime; refresh checks the underlying permission • Shared Signals Framework push notifications for defined lifecycle events • One consumer journey may cover multiple datasets; access tokens remain EDH/resource-specific		• Cross-sector schema and trust-framework interoperability
Monitoring, Audit & Assurance	• Audit logging linked to permission/grant identifiers • Monitoring of availability, API performance, permission events, verification, matching and journey drop-off • Risk-based REC Performance Assurance Framework • Annual compliance evidence for applicable consumer requirements • On-request ATP reporting where central monitoring is insufficient	• Refined thresholds and reporting based on operational evidence • Behavioural and anomaly monitoring where proportionate • Expanded consumer insight and targeted assurance techniques	• Automated compliance insights across a broader CCS ecosystem
Platform Resilience & Operations	• 99.9% availability, capacity, recovery and service-support requirements • No separate outage fallback: energy data requires a valid access token • Retry, incident, disaster-recovery, backup and key-rotation arrangements • Testing and pre-production support for CCS Users	• Operational dashboard and capacity tuning using live-service evidence • Optimisation of resilience, support and onboarding processes	• Agentic AI enhancements

Governance & Trust Framework	• New REC CCS Arrangements Schedule and supporting REC products • Non-Party REC Service User Access Agreement route for non-REC Parties • REC qualification, testing, change and performance-assurance arrangements extended to CCS • CE+ minimum cyber-security baseline; appropriately scoped ISO 27001 may be accepted as equivalent • Risk-based ISDP assessment • Governed processes for Data Products and Permission Purposes	• Operational Permission Purpose Catalogue and proportionate change process • Cross-code alignment with SEC, BSC, DSI, SDR and Tariff Interoperability • Refinement of charging, assurance and reporting as adoption develops	• Governance for wider Smart Data and cross-sector entrants • Governance for additional lawful-basis schemes and non-domestic use cases
Communication, Transparency & Education	• CCS consumer-facing identity and trust approach • Consumer Experience Guidelines for ATP best practice • CCS User onboarding and implementation guidance	• Expanded implementation guidance, education and training • Awareness activity informed by adoption and consumer research • Journey-specific guidance for additional datasets and routes	• Consumer education aligned with wider Smart Data arrangements
Cross Sector Interoperability & Future Data Capabilities	• Reusable architecture, trust, permission and authorisation foundations • Alignment with the Energy Digitalisation Framework and recognised open standards	• Tariff Interoperability Phase 1b • Early alignment with DSI, SDR, FMAR and wider Smart Data initiatives	• Fuller Smart Data interoperability, subject to policy and governance

4. Product Backlog

The Product Backlog records ideas that have been considered but are not currently prioritised within the roadmap horizons. Backlog status does not mean that an item has been rejected. It means that there is not yet sufficient priority, evidence, dependency readiness or design maturity to place it in Now, Next or Later.

- Guest account or guest permission journey, including consolidation. The MMP requires a verified CCS account and a guest route would not remove the identity and current-occupancy checks. This may be reconsidered if evidence identifies a material consumer benefit that cannot be achieved through the account-based journey.
- White-labelled CCS Consumer Portal. This remains subject to a clear consumer need and an agreed trust, operating and governance model.

- Future CCS interaction with Smart Data consumer protection, complaints and redress arrangements, subject to wider government policy development.

An item may move from the Product Backlog into Next or Later when there is a defined consumer or market need, an appropriate policy and regulatory route, sufficient dependency readiness, an indicative cost and an identified governance owner.

5. Roadmap dependencies and maintenance

5.1 Conditions affecting progression

Progression of Next, Later and Product Backlog items depends on the evidence and conditions relevant to each item. These include:

- consumer and market need, including evidence from operation of the CCS;
- readiness and willingness of the relevant EDHs and other external services to integrate with the CCS;
- policy and regulatory direction, including the arrangements under any relevant energy code or licence;
- governance, funding and value for money; and
- technical feasibility, detailed design and implementation readiness.

These dependencies explain the current roadmap position. They do not create an assumption that every item will progress. All changes will follow the REC Change Process which provides the required governance and transparency on changes.

5.2 Pre-existing permissions

Pre-existing permissions are outside the MMP and remain a future roadmap item. Bringing them into the CCS would require an agreed migration and governance approach, including the relevant supplier, licence and implementation arrangements. The main consultation explains the phased treatment of existing permissions in section 3.2.1; this roadmap records the future direction without pre-empting those decisions.

5.3 Maintaining the roadmap

RECCo will maintain the roadmap as an enduring CCS artefact, informed by regulatory direction, industry and consumer evidence, service performance, assurance findings and the readiness of future Data Products and participants. Changes requiring amendments to REC products will progress through the applicable REC change governance.

6. Alignment of the MMP with Ofgem scope and expectations

6.1 Purpose and basis of assessment

This assessment shows how the MMP and future roadmap treatment align with the scope and expectations established through Ofgem's Consumer Consent publications and subsequent Working Group Advisory Paper recommendations. It provides requirement-level assurance alongside the strategic capability roadmap.

Closely related source statements have been consolidated into outcome-based requirements without removing the underlying traceability. Each consolidated requirement is assessed against the MMP and, where further scope remains, its treatment in the roadmap.

6.2 Detailed scope alignment

The table below retains the consolidated requirements so that readers can see the relationship between the established scope, the MMP response and future roadmap treatment.

Domain	Consolidated scope / requirement	MMP delivery and roadmap treatment
Purpose	CCS shall provide a consistent, standardised, system-wide process for consumers to grant and manage energy-data-sharing permissions, avoiding disparate or duplicated mechanisms.	**MMP:** MMP establishes one common CCS framework for granting, recording, viewing, managing and revoking permissions. **Roadmap:** Later phases extend the same framework to more datasets, participants and journeys.
Purpose	CCS shall give consumers transparent choice and control over energy-data sharing so that they can understand and benefit from the use of their data.	**MMP:** The digital MMP gives verified consumers visibility and control through the Consumer Portal, including grant, review, query and revocation. **Roadmap:** Future phases broaden visibility beyond the permissions and data-sharing arrangements included at MMP.
Purpose	CCS shall support consumer trust, competition and innovation through transparent permissions, proportionate accreditation and appropriate operational controls.	**MMP:** MMP combines transparent permissions, participant qualification, the Directory, security controls, assurance and monitoring to support trust and market entry. **Roadmap:** The framework can be extended and aligned with additional data sets and participant types.
Purpose	CCS shall enable flexibility, decarbonisation and wider energy-system outcomes, including participation in flexibility markets and interaction with Smart Data Schemes.	**MMP:** MMP establishes reusable permission, trust and authorisation capabilities that can support consumer services and future participation in flexibility markets. **Roadmap:** Delivery of wider flexibility, decarbonisation and Smart Data Scheme outcomes requires additional datasets, participants and use cases to adopt the CCS after MMP.
Purpose	CCS shall be designed to interoperate with relevant cross-sector Smart Data services and avoid creating sector-specific silos.	**MMP:** MMP uses recognised open standards and establishes an extensible architecture designed to interoperate with other trusted data-sharing services. **Roadmap:** Whilst the system has been design to enable cross sector federation, the MMP does not deliver a live cross-sector federation.
Consumer permissions	CCS shall provide a user-friendly consumer-facing dashboard or equivalent interface through which consumers can access and manage their energy-data-sharing permissions.	**MMP:** MMP includes a verified consumer account and Consumer Portal for accessing, viewing and managing permissions. **Roadmap:** Assisted and non-digital interfaces may be added in later phases.
Consumer permissions	CCS shall enable consumers to grant, view, manage and withdraw informed, purpose-specific and time-bound permissions for energy-data sharing, with withdrawal communicated as close to real time as the approved service design permits.	**MMP:** MMP supports informed, purpose-specific permissions with duration, central visibility, review, revocation and lifecycle controls. **Roadmap:** Future phases may expand visibility and management to additional datasets and permission arrangements.
Data scope	The initial CCS data scope shall cover half-hourly smart-meter consumption data and Advanced Meter consumption data where applicable.	**MMP:** MMP will support half-hourly metered data through Elexon's SDR based on settlement rather than smart meter readings. Provision of specific data types is dependent on the EDHs participating. **Roadmap:** Further energy data sets will be onboarded as data becomes available through participating and future EDHs.
Data scope	CCS shall be data-source agnostic and interoperable with multiple relevant data sources, providers and systems.	**MMP:** The hybrid architecture, Directory, permission model and open-standard APIs are reusable and not tied to a single data source. **Roadmap:** Additional sources and providers can be onboarded through later governed changes.
Data scope	CCS shall be extensible beyond consumption data, with additional datasets introduced subject to prioritisation, approved scope and delivery sequencing.	**MMP:** MMP delivers the reusable capability. **Roadmap:** Tariff, smart meter, gas, asset control, PSR and other datasets are sequenced after MMP.
Data scope	CCS shall support staged future participation by non-domestic consumers and other user types, subject to an approved scope and onboarding sequence.	**MMP:** MMP delivers the reusable CCS permission, governance, accreditation, trust and technical capabilities required to support future participation by non-domestic consumers and other user types. These capabilities are designed to be extensible and reused as CCS scope expands.

Domain	Consolidated scope / requirement	MMP delivery and roadmap treatment
		Roadmap: Non-domestic consumers and other user types are roadmap items requiring further consultation, iteration and future onboarding.
Data scope	Suppliers shall record relevant pre-existing permissions/consents in CCS in accordance with the bespoke licence obligations and migration arrangements approved following statutory consultation.	**MMP:** Pre-existing permissions were agreed to be out of scope for MMP through the CCS working groups and with Ofgem. **Roadmap:** Migration of existing permissions/consents depends on later licence, statutory consultation and implementation arrangements.
Accessibility and support	CCS shall provide an accessible and inclusive consumer experience, including compliance with approved accessibility standards, tested plain English, appropriate translated content, assisted and non-web routes, and journeys that accommodate differing occupancy and authority arrangements.	**MMP:** MMP provides accessible, plain-language digital journeys designed to meet WCAG 2.2 AA and accommodates the MMP occupier-led and multi-occupancy permission arrangements. **Roadmap:** Assisted and non-digital journeys, broader translated content and further inclusive routes are not delivered at MMP and will be developed through later phases and corresponding CEG updates.
Accessibility and support	CCS shall provide clear consumer support, complaints, redress and enforcement routes, with responsibilities for oversight, delivery and escalation defined through governance arrangements.	**MMP:** MMP defines ATP-led complaints, CCS service support, permission query/revocation, REC assurance escalation and access suspension or revocation. **Roadmap:** Specific ADR or ombudsman requirements remain under review as the wider Smart Data consumer-protection framework develops.
Identity and authority	CCS shall establish and verify a consumer's authority to grant permissions using proportionate identity assurance, authentication and account or premises matching, reusing reliable trusted evidence where appropriate and supporting exceptions where the bill payer, occupier and person sharing data differ.	**MMP:** MMP separately verifies identity and current occupancy, matches the verified property through EES, supports multiple evidence routes and applies step-up controls where needed. **Roadmap:** Additional identity schemes, providers, reusable assertions and assisted verification routes may be added later.
Identity and authority	Consent seekers and energy-data users shall be listed and subject to proportionate, reusable accreditation, assurance and audit arrangements, including arrangements for organisations outside the REC.	**MMP:** ATPs and EDHs must be qualified CCS Users, recorded in the Directory and subject to reusable accreditation, ISDP, testing, monitoring and audit arrangements. **Roadmap:** Cross-code recognition and onboarding for further participant types will continue to evolve.
Technology and architecture	CCS shall use a hybrid architecture with decentralised characteristics, with central components limited to the minimum necessary to support agreed registers, directories, governance functions and consumer visibility.	**MMP:** MMP uses the hybrid model: CCS centralises permission, trust, Directory and token issuance while energy data remains with EDHs and flows directly to ATPs. **Roadmap:** The same allocation is intended to support additional datasets and participants.
Technology and architecture	CCS shall use standardised APIs, permission models and lightweight protocols to exchange permissions; decentralised tokens or certificates should be used where approved through the detailed architecture design.	**MMP:** MMP uses standardised CCS APIs and permission structures, with signed, resource-specific access tokens validated locally by EDHs. **Roadmap:** The technical profiles and schema can be extended through governed design changes.
Technology and architecture	CCS shall interoperate with relevant energy infrastructure and be agile, extensible and scalable, reusing proven technology, standards, trust frameworks and accreditation approaches where suitable.	**MMP:** MMP uses open standards, reusable components and an extensible hybrid architecture designed to scale and interoperate with relevant energy services. **Roadmap:** Further infrastructure, datasets and schemes can be connected through the roadmap and REC change process.
Security and privacy	CCS shall apply secure-by-design principles informed by cyber-risk analysis, using proportionate controls, approved security standards and periodic lifecycle testing with clear accountability.	**MMP:** MMP applies secure-by-design controls, cyber-risk analysis, FAPI 2.0, mTLS, CE+ or equivalent assurance, ISDP assessment and lifecycle testing. **Roadmap:** Controls and assurance thresholds can be updated as risks and use cases evolve.
Security and privacy	CCS shall apply privacy by design, maintain an up-to-date data protection impact assessment, and provide auditability, monitoring, enforceable controls and the ability to suspend or revoke access for misuse or non-compliance.	**MMP:** MMP embeds privacy by design, audit logging, monitoring, performance assurance and powers to suspend or revoke access for misuse or non-compliance. **Roadmap:** The DPIA, reporting and assurance approach will be maintained and refined through operation.
Governance	RECCo shall act as the CCS Delivery Body within REC governance and Ofgem-regulated oversight, with delivery	**MMP:** MMP is delivered by RECCo through REC-governed products and processes, with Ofgem oversight and distinct delivery, participant and enduring governance responsibilities.

Domain	Consolidated scope / requirement	MMP delivery and roadmap treatment
	oversight, enduring governance, participant-use governance and associated responsibilities clearly distinguished.	**Roadmap:** Enduring governance will continue through the REC change framework after implementation.
Governance	CCS shall operate through a Trust Framework or equivalent usage-governance mechanism, with its legal basis, REC boundary, participation model and enforcement arrangements determined through the approved governance design.	**MMP:** MMP establishes the CCS trust and usage-governance mechanism through qualification, the Directory, Access Agreements, the Arrangements Schedule and enforcement controls. **Roadmap:** Participation boundaries and links with other schemes can evolve through approved governance changes.
Governance	CCS Working Groups shall provide advice and recommendations; formal service-design decisions shall be taken through RECCo consultation and the applicable governance process.	**MMP:** The consultation records Working Groups as advisory and places formal design and drafting decisions with RECCo and the applicable REC governance process. **Roadmap:** No separate future capability is required, although later changes will follow the same governance principle.
Implementation	CCS development through MVP shall initially be funded through REC cost recovery.	**MMP:** The consultation confirms that CCS development and initial operation around MMP are recovered through REC cost-recovery arrangements. **Roadmap:** The charging approach may evolve as adoption and market maturity develop.
Implementation	The enduring CCS funding mechanism shall be determined separately following development of the MVP and the required regulatory assessment.	**MMP:** MMP uses the interim REC cost-recovery approach rather than settling the enduring funding model. **Roadmap:** The enduring funding mechanism and any wider user-pays or transactional approach will be determined later.
Implementation	Ofgem shall complete and consult on an impact assessment and value case before any binding deployment or REC approval decision.	**MMP:** Ofgem has already completed and consulted on the CCS Impact Assessment and value case. The MMP has been developed in response to that assessment and the associated Ofgem decisions, providing the evidential and policy basis for CCS implementation. **Roadmap:** No material future scope remains against this requirement. Any future deployment, scope expansion or evolution will continue to follow the applicable regulatory and REC governance processes.
Implementation	CCS shall use phased development, testing, onboarding and transition rather than a single Big Bang deployment; any later mandation shall require a separate decision.	**MMP:** MMP is expressly the first phase, with phased development, testing, qualification, onboarding and later expansion through REC change. **Roadmap:** Any later mandation and additional scope require separate decisions.
Future evolution	RECCo shall undertake a detailed CCS service-design consultation covering design, implementation, security, technical standards, consumer protection, accessibility and relevant Working Group recommendations.	**MMP:** This detailed RECCo consultation covers service design, implementation, security, technical standards, consumer protection, accessibility and REC drafting. **Roadmap:** Responses will inform final drafting and subsequent REC change governance.
Future evolution	Following the minimum marketable product, CCS should expand consumer visibility to relevant third-party and non-consent energy-data flows, subject to approved scope, lawful exceptions and delivery sequencing.	**MMP:** MMP establishes the reusable CCS permission, trust, governance and technical framework capable of supporting additional data-sharing arrangements beyond the initial MMP scope. **Roadmap:** Future scope includes broader visibility of third-party and non-consent data flows, migration of existing permissions and review of DCC System data inclusion, subject to the relevant policy, code and governance decisions.