

By email to: digitalisation@ofgem.gov.uk

08/09/2026

RECCo response to: Consultation on Data Domain Coordinator role guidance

We welcome the opportunity to respond to this consultation. Our non-confidential response represents the views of the Retail Energy Code Company Ltd (RECCo). Our views are based both on our existing role as the operator of the Retail Energy Code (REC), for which we will shortly become the Ofgem-licensed Code Manager, as well as our anticipated role as the appointed Data Domain Coordinator for the Consumer Data Domain.

We support the broad direction of Ofgem's proposals. We consider that the Data Domain Coordinator framework can help address the current gap in system-wide coordination of energy-data design and architecture, by establishing accountable leadership within individual domains and mechanisms for addressing cross-domain issues. In that sense, the proposals would perform some of the functions commonly associated with a design authority, although their effectiveness will depend on the powers, accountabilities and delivery mechanisms underpinning them.

Our principal observations and recommendations are that:

- the framework should remain genuinely federated, with each Data Domain Coordinator accountable for coordination within its domain and with existing Code, licence, technical, assurance and stakeholder-governance arrangements used wherever they provide the most appropriate and efficient means of delivery;
- domain boundaries and coordination responsibilities should be determined by reference to the relevant data types, use cases and existing governance arrangements. Where responsibilities overlap, the enduring arrangements should reflect the respective strengths and responsibilities of the relevant bodies. This includes considering, on the merits and following the detailed domain-definition exercise, whether SECCo should have a formal role alongside Elexon in relation to relevant Smart Energy Code (SEC)-governed metering data;
- the guidance should distinguish clearly between coordination and advice, decisions that a coordinator can take within its own remit, and outcomes that require binding changes to the rights or obligations of other bodies. As presently framed, several of the proposed expectations are not supported by clear vires enabling coordinators or the proposed cross-domain governance bodies to require action, expenditure or changes to regulated systems and processes;
- rather than creating a parallel enduring governance regime, Ofgem and DESNZ should build upon the regulatory and governance reforms already made or being introduced. These

include the Code Manager licensing framework, the Strategic Direction Statement, established Code-change and cross-Code coordination processes, relevant cooperation obligations, and Ofgem's existing powers to make licence changes, Code changes and directions; and

- the enduring arrangements should provide clear accountability, decision-making, escalation and appeal routes, together with an appropriate basis for funding. The initial period of cooperation between Data Domain Coordinators should also be used to establish the evidence and business case for any future Digitalisation Coordinator Function.

We would be happy to discuss any of our comments further.

Yours sincerely,

Jon Dixon
Director, Strategy and Development

Appendix: Consultation responses

This appendix sets out RECCo's responses to the 16 consultation questions. Our responses should be read alongside the overarching points in our covering letter. As several questions address overlapping issues, we have used cross-references where appropriate to avoid repetition. We have also indicated where we require further clarification before we can provide an informed view.

Section 2: Overview of Domain Coordinator role

Q1) Do the data types in scope for each domain provide a complete representation of each domain?

Yes, with some caveats and requested clarifications.

First principles for bringing data under Data Domain Coordinators' remit

We consider that it would be helpful for Ofgem to set out the first principles that determine whether a data type needs to be included in a data domain at all.

RECCo believes these principles are that data should be included in a domain where it is: (1) shared between organisations; and (2) supports use cases where coordination is needed to ensure consistent and effective data discovery, access and interoperability. As such, domain inclusion should focus on where coordination adds value. The guidance for Data Domain Coordinators should therefore recognise that not all data types in the energy industry may need to be assigned to a domain. For example, energy suppliers will hold a variety of sensitive consumer data beyond that currently reflected in the scope of the Consumer Data Domain. Coordination of that data, and inclusion in a domain, is only required where it needs to pass between different organisations in a standardised way to support a particular data-sharing use case.

Explicit clarification of these principles is needed to determine whether a domain representation is considered 'complete', including shaping what Data Domain Coordinators are expected to deliver in their initial domain definitions. Lack of clarity about when a data type requires domain inclusion could create ambiguity, confusion and risk of over-scoping coordinators' role and domains.

RECCo agrees that all the data types listed in Table 1 of the consultation are appropriate for inclusion in a domain, since they meet these first principles.

Principles for including gas data in domains

While the focus of energy digitalisation initiatives has tended to be on electrification, gas will continue to be a feature of the energy industry for the foreseeable future. Many consumers will continue to be dual fuel. RECCo considers that gas data improvements therefore still have the potential to help deliver the Energy Digitalisation Framework's vision around efficient system planning and improved consumer outcomes. As such, we believe that their benefits should not be underplayed or ignored.

RECCo believes that Ofgem should clarify that, unless explicitly specified otherwise, energy data domains are dual fuel and that Data Domain Coordinators should consider gas and electricity use cases equally and prioritise them based on their value to the system and consumers. While not explicitly stated in the consultation, the rest of our response assumes that the Consumer Data Domain is dual fuel and covers both electricity and gas consumers.

Principles and process for future inclusion of other energy sub-sectors

As the energy sector evolves, new data types or domains may be required, and existing domains may need to extend to other subsectors such as heat networks. Any such expansion should be determined by DESNZ and Ofgem following consultation with the Data Domain Coordinators and relevant stakeholders. The guidance should clarify this process to prevent uncoordinated scope expansion and ensure that coordinators' responsibilities remain deliverable, particularly where other subsectors have different governance and delivery arrangements.

Unless otherwise specified, the remainder of our response assumes that the current domains cover only the gas and electricity sectors.

Principles for determining the appropriate energy data domain

When deciding how to allocate data types to domains, RECCo agrees with the Energy Digitalisation Framework's position that data domains should be functional and that each domain should be a defined category of related energy data, based on logical groupings of similar activities in the system.

We recognise that there will be data types which can be argued to serve more than one function. Wherever this arises, RECCo agrees with Ofgem's position in the consultation that domain assignment should be determined by the data's primary function and the outcomes it supports.

Scope of Consumer Data Domain

Applying all the above principles, RECCo agrees with Ofgem that all the Consumer Domain data types shown in Table 1 support consumer outcomes as their primary function, supporting activities such as consumer switching, billing, vulnerability support and redress, as well as emerging consumer services. We also agree with Ofgem that RECCo is best placed to coordinate the delivery of Code changes relating to those data types, whilst recognising that changes outside of the scope of the REC would need to be progressed through the relevant Code or licence. We therefore agree with the consultation's position that all the Consumer Domain data types shown in Table 1 sit most appropriately in the Consumer Data Domain.

We also agree that the high-level representation of the Consumer Data Domain appears complete. However, we note that this representation remains subject to the results of RECCo's more detailed domain definition exercise.

Regarding the addition of Priority Services Register (PSR) data to the Consumer Data Domain, we note that this is framed in the context of supporting a future Share Once Support Register (SOSR) or equivalent schemes. We agree that this the right domain assignment and that RECCo is

potentially well placed to help facilitate greater PSR data sharing. However, we seek more clarity on the intended delivery outcome, both in our role as Data Domain Coordinator and as Code Manager for the REC. Ofgem's draft Strategic Direction Statement (SDS) currently lists PSR activity under 'Think & Plan', a category defined as having a 2–3 year timeframe.¹ The more recent inclusion of PSR in the Consumer Data Domain suggests a potential move towards an 'Act Now' directive, but the immediate ask of RECCo and the REC is unclear.

Clarification of expectations in this area will help RECCo set proportionate assumptions in both our SDS Delivery Plan and Data Domain Coordinator Delivery Plan – avoiding the risk that we over- or under-invest REC Party funding in work that is not yet sufficiently defined. We seek clarity on the sectors that are intended to be within scope of a SOSR and on RECCo's intended coordination and delivery role, including any potential interactions with our Consumer Consent Solution (CCS). We understand that Ofgem is currently undertaking a policy review of the PSR. RECCo therefore also highlights the importance of joining up both policy and digitalisation work in this area, to ensure consistent expectations of RECCo as both Data Domain Coordinator and REC Code Manager.

Scope of other data domains

RECCo is not best placed to comment on whether other domain representations are themselves complete. Once all Data Domain Coordinators have delivered their own initial domain definitions, these should be used to re-confirm domain scope and boundaries.

With the exception of the allocation of meter asset data (our concerns about which are covered under Question 2), and subject to our above clarifications about the overall scope of the domains, RECCo agrees that the three other data domains represent logical, functional groupings of data.

Q2) Which domain is best placed to coordinate meter asset data, considering the use cases the data supports, governance arrangements and cross-domain interoperability? Please explain your reasoning.

RECCo agrees with the allocation of 'meter technical details' to the Consumer Data Domain, as shown in Table 1 of the consultation under 'switching data and account information'. However, we also note that Table 1 shows 'meter asset data' as its own data type within the Metering Data Domain. To be able to fully answer this consultation question, we require further clarification of what that other meter asset data represents and what use cases it supports. This is currently not defined clearly, creating a risk that responses to this question require subjective interpretation. We expand on this further below.

Primary function and outcomes supported by Meter Technical Details

As set out in our answer to Question 1, RECCo agrees with Ofgem that, for all data types, domain assignment should follow the data's primary function and the outcomes it supports. The primary

¹ Pages 25-26 of Ofgem's draft second preliminary Strategic Direction Statement for industry codes (April 2026):

<https://www.ofgem.gov.uk/consultation/consultation-draft-second-preliminary-strategic-direction-statement-industry-codes>.

function of Meter Technical Details (MTDs) is to support consumer outcomes through activities such as registration, switching and billing. As such, RECCo agrees with Ofgem's assignment of MTDs to the Consumer Data Domain.

Data Domain Coordinator's ability to deliver changes to MTDs

RECCo acknowledges that functional data domains can span more than one Industry Code. We also recognise that the success of the new coordinator role relies ultimately on close cooperation between the Data Domain Coordinators, regardless of their individual domain boundaries or Code management responsibilities. RECCo is committed to working closely with the other domain coordinators to ensure coordinated and effective delivery of this new role.

Notwithstanding that commitment, we note that both the Energy Digitalisation Framework and this consultation clarify that assignment of Data Domain Coordinators was in part based on the chosen organisation's ability to deliver regulatory Code changes. The wording of this consultation (Question 2) also references governance arrangements as a consideration in domain scope. While MTDs' integral role in consumer-facing activities is our primary reason for agreeing with that data's assignment to the Consumer Data Domain, we also suggest that there are efficiency benefits if the domain assignment for a data type follows the entity with the practical governance levers and assurance framework to improve it.

For both gas and electricity, RECCo governs:

- The existing MTDs standards and metadata;
- Governance and maintenance of valid sets for meter configuration and asset data;
- The arrangements for accessing MTDs via the REC's Enquiry Services;
- The REC change process for amending those standards and access arrangements; and
- The assurance processes for improving the quality of MTDs (via the REC's Performance Assurance Framework).

RECCo believes that these are therefore additional reasons to include MTDs within the Consumer Data Domain.

Scope of 'meter asset data'

RECCo is unclear whether the 'meter asset data' referred to in this consultation question is meant to include, or exclude, MTDs.

Paragraph 2.6 of the consultation defines meter asset data as 'data about the meter', which is unclear and open to interpretation. In its arguments as to why this meter asset data might alternatively sit in the Metering Domain, paragraph 2.6 goes on to state that the data relates to the operation, management and performance of metering assets. RECCo considers these activities to be retail functions that support consumer outcomes, since they directly impact the accuracy of consumer billing and security of supply to a premises.

Within Table 1, we note that meter asset data is defined as ‘including asset identifiers, type and status’. However, Meter ID, Meter Type and Energisation Status, along with many other related data items, form part of MTDs.

Finally, we note that the REC’s definition of MTDs is already defined broadly as meaning: ‘*all the relevant information about Energy meters required by the Registered Energy Supplier, Supplier Agents, Distribution Network Operator and/or Gas Transporter to carry out its duties as such under this Code [the REC] and other Energy Codes*’.²

Based on the above, it is not obvious what meter asset data could include beyond MTDs.

Conclusion on most appropriate domain assignment

For all the above reasons, RECCo remains of the view that MTDs should sit in the Consumer Data Domain.

If no other metering asset data can be identified that sits better in the Metering Data Domain, we consider that there could be a potential argument for renaming that domain as the Metered Data Domain for clarity. Metered Data refers better to data that has been measured through a meter, avoiding confusion with information about the metering asset itself.

RECCo has previously advocated a federated approach to governance (for instance in relation to the enduring governance of the Smart, Secure Energy Systems programme³) under which each industry body exercises responsibility within its established area of expertise. In that context, we suggested that balancing and settlement requirements should be governed through the BSC, switching arrangements through the REC, and smart-metering arrangements through the Smart Energy Code (SEC). We consider that the same general principle should inform both the allocation of metering data between domains and the selection of the organisations responsible for coordinating that data.

We recognise that Elexon has a strong interest in, and existing responsibilities relevant to, metering data—particularly electricity settlement data and the delivery of Market-wide Half Hourly Settlement, the Data Integration Platform and Smart Data Repository. Nothing in our response is intended either to diminish Elexon’s proposed role or to advocate for responsibility to be allocated to any alternative organisation. Our point is instead that metering data is an area in which interoperability will be especially important and where the coordination arrangements should not be framed more exclusively than necessary.

Accordingly, the relevant data types should be considered individually by applying the principles set out in our response to Question 1 and earlier in this answer. These include the data’s primary function and use cases; the organisations holding or using it; the existing Code, licence and

² REC Schedule 1 ‘Interpretations and Definitions’, <https://recportal.co.uk/rec-main-body-schedules>.

³ RECCo, response to Smart Secure Electricity Systems (SSES) Programme: Enduring Governance <https://retailenergycode.co.uk/our-response-to-smart-secure-electricity-systems-sSES-programme-enduring-governance/> (September 2025).

assurance arrangements governing it; the practical levers available to implement improvements; and the need to support effective cross-domain interoperability.

Applying those principles, the SEC provides a comprehensive dual-fuel governance framework for significant categories of metering data and associated arrangements. These include the interoperability and operation of Smart Metering Systems, access to smart-meter data, end-to-end technical and business architecture, data and systems security, privacy, Data Communications Company (DCC) service performance and assurance of SEC Parties. The SEC Panel also has an express duty to establish joint working arrangements with other energy Code bodies, while SECCo provides the corporate vehicle through which relevant governance arrangements, contracts and expenditure are administered.

SECCo could therefore be considered as one of the possible Domain Coordinators for relevant metering-related data. This need not involve an either/or choice between SECCo and Elexon. Depending on the outcome of the detailed domain-definition exercise, appropriate arrangements might include:

- Elexon and SECCo coordinating separately defined components or subdomains;
- one organisation acting as lead coordinator, with the other assigned a formal co-ordination or delivery role for the data governed through its Code; or
- a joint arrangement with clear lead accountability for each data type, standard and decision.

Any such arrangement should also provide for appropriate participation and cooperation by the DCC, recognising its role as the operator of the relevant systems and holder or processor of much of the data.

Given these existing roles and the overlaps in responsibility for metering data recognised in the consultation, we consider that the domain-definition exercise should provide a more detailed understanding of the relevant data types, use cases and existing governance arrangements. Once that work has been completed, there would be value in Ofgem and DESNZ assessing, on the merits and in light of the evidence emerging from the exercise, whether the coordination arrangements should include a formal role for SECCo alongside Elexon in relation to relevant SEC-governed data. This would preserve the benefits of Elexon's appointment while allowing the enduring arrangements to reflect the respective responsibilities and strengths of the relevant bodies, consistent with a federated model, avoiding duplication and making maximum use of established governance arrangements.

Q3) Are there any additional data types that should be included, or data types that could sit in alternative domains than their categorisation in Table 1?

No, none that RECCo has identified at this time.

This remains subject to the results of Data Domain Coordinators' more detailed domain definitions. These definitions should be used to re-confirm domain scope and boundaries.

Section 3: Requirements and expectations for Domain Coordinators

Q4) Is the purpose of Domain Coordinators clear and sufficiently explained to guide delivery and accountability? If not, where is additional detail required?

No. RECCo supports the consultation's position that the overall purpose of the Data Domain Coordinator role should be to help improve data discovery, access and interoperability for both existing and future data-sharing use cases. However, we believe that more clarity is required on Data Domain Coordinators' remit and on how delivery accountabilities will be federated across coordinators, Code Managers, Central System Delivery Bodies (CSDBs), Code parties and other relevant licensees.

RECCo notes and supports the statement in paragraph 3.6 of the consultation that the role of Data Domain Coordinators is not to replace the core functions of existing industry bodies (including Code management functions) but to add coordination and data standardisation to existing processes. We also note and support the statement in paragraph 3.5 that the creation of the coordinators is not about centralising the holding of, or control over, data. However, we believe that the consultation is unclear (and in some places inconsistent) on whether the purpose of Data Domain Coordinators is to provide coordination through guidance and best practice examples, or to make directive recommendations or decisions that require domain stakeholders to act.

For example, paragraph 3.11 of the consultation says that:

'To achieve the benefits of data standardisation and accessibility, domain participants will be required to take some actions with regards to improving data quality, participating in digital infrastructure, and implementing data standards. Domain Coordinators may recommend licence or code modifications to Ofgem and DESNZ where stronger enforceability of these activities is required. Decisions to pursue such changes should be considered by the Digitalisation Board where they fall within the Board's remit.'

RECCo considers that this does not clearly explain the governance mechanism that will require domain participants to take action, or the role of Data Domain Coordinators (or the Digitalisation Board) in existing Code and licence change processes.

RECCo believes that any regulatory mechanism for overseeing and enforcing the Data Domain Coordinator role must in principle:

1. Empower and obligate Data Domain Coordinators to undertake their required coordination activities;
2. Require Code Managers, CSDBs, Code parties and other relevant Ofgem licensees to undertake any required associated delivery activities; and
3. Federate clear accountabilities across all these entities in a way that respects existing industry Code and licence accountability frameworks, and those frameworks' governance and change processes (which are designed to utilise expert analysis, stakeholder engagement and Ofgem oversight to ensure robust and cost-effective solutions, measured against clear objectives).

RECCo recognises that Ofgem plans to undertake a further October 2026 consultation on the regulatory mechanisms that will hold RECCo and Elexon accountable for their Data Domain Coordinator role. However, as it stands, the guidance in this current consultation sets out expectations without the powers and accountabilities needed to deliver them. We expand on these points in our answers to Questions 6 and 9.

Section 3 of the consultation also covers expectations on Data Domain Coordinators regarding digital infrastructure. RECCo agrees with the consultation's position that delivery of digital infrastructure is not part of the coordinator role, and that where the same entities deliver infrastructure they do so as a separate function. We do however have some concerns about the technical requirements for Data Domain Coordinators regarding digital infrastructure, as set out in Section 5 of the consultation, as well as the overall strategic governance accountability for NESO's Data Sharing Infrastructure (DSI) and RECCo's Consumer Consent Solution (CCS). We detail these in our answer to Question 10.

Q5) Which areas of responsibility should transfer from Domain Coordinators to the future digitalisation coordination function? How could the transition be managed to avoid any duplication or gaps?

We consider that the focus should not be on the future transfer of responsibilities from Data Domain Coordinators, but on identifying any distinct, system-level coordination functions that a future Digitalisation Coordination Function (DCF) would be uniquely placed to perform.

Principles for establishing a DCF

RECCo believes that establishing a DCF should not aim to create a 'super entity' with a new layer of centralised design control. We consider that any DCF functions should not override Data Domain Coordinators' own coordination responsibilities for their domains, just as Data Domain Coordinators' functions should not override the delivery responsibilities of Code Managers and Central System Delivery Bodies as defined in licences and Codes.

For example, we recognise that one of the intended functions of a DCF may be to coordinate with other sectors beyond energy. This could include collaboration on cross-sector use cases and wider interoperability of standards and architecture. However, we consider that any DCF recommendations in these areas could not simply be top-down, since they would also rely on Data Domain Coordinators' understanding of their own domains.

RECCo believes that the focus should be on establishing which, if any, coordination functions cannot be achieved through Data Domain Coordinators' own cooperation and governance and might therefore require an additional overarching body.

Process for determining the DCF business case

The creation of any new DCF role, whether fulfilled by a new or existing organisation, will take time and will add cost and complexity to industry governance arrangements.

As no DCF yet exists, Data Domain Coordinators will already be working together initially to achieve cross-domain coordination. DESNZ and Ofgem also have existing powers to use licence and Code frameworks to set coordinators' strategic direction and embed cooperation requirements. Stakeholders may consider that the case for funding another body to 'coordinate the coordinators' is not yet proven.

RECCo therefore suggests that this initial period of working could be used to gather evidence on the business case for, and appropriate scope of, a future DCF. Without such evidence, it is difficult to give an informed view on either the best target end state to address any gaps or how to transition to it in a way that avoids duplication.

Q6) Do you have views on the most appropriate regulatory mechanism for overseeing and enforcing the Domain Coordinator role?

Yes. RECCo's view is that, wherever possible, existing regulatory frameworks should be used to oversee and enforce accountabilities relating to the Data Domain Coordinator role.

As set out in our answer to Question 4, RECCo believes that any regulatory mechanism for overseeing and enforcing the Data Domain Coordinator role must in principle:

1. Empower and obligate Data Domain Coordinators to undertake their required coordination activities;
2. Require Code Managers, Central System Delivery Bodies (CSDBs), Code parties and other relevant Ofgem licensees to undertake any required associated delivery activities; and
3. Federate clear accountabilities across all these entities in a way that respects existing industry Code and licence accountability frameworks, and those frameworks' governance and change processes.

Preferred enduring regulatory mechanism

Our preferred enduring option for RECCo and, where appropriate to achieve consistency, for Elexon, would be to enshrine our Data Domain Coordinator accountabilities within our Code Manager licence framework, for example via a Special Condition.

Incorporating the role within the relevant principal licences would build upon the Code Manager licensing framework introduced through code reform, including the Strategic Direction Statement (SDS), Code and cross-Code modification processes, budget and delivery-plan oversight, Data Best Practice obligations and Ofgem's performance and enforcement powers. While we recognise that data domains are not specific to an individual Code, this does not necessarily require Ofgem to create an entirely new licence type or formal governance framework. The core accountabilities of each Data Domain Coordinator could instead be enshrined in the principal regulatory licence applicable to the appointed organisation. For RECCo and Elexon, the Code Manager Licence appears to provide the appropriate regulatory home; for NESO, equivalent provisions could be included in its Electricity System Operator and, so far as necessary, Gas System Planner licence arrangements. This would establish consistent baseline responsibilities and place RECCo and Elexon on an equivalent regulatory footing to NESO in respect of its digitalisation obligations,

while allowing the detailed oversight and funding arrangements to reflect the different regulatory frameworks.

We also note that the consultation states that Data Domain Coordinator appointments were based in part on the relevant entities' ability to progress Code changes within their domains, suggesting that DESNZ and Ofgem see a link between the coordinator role and Code governance. For RECCo and Elexon, the Code Manager Licence could establish the enduring responsibilities and accountability of the role. The SDS could then identify energy digitalisation—and, in particular, the progressive development and delivery of the Data Domain Coordinator role—more explicitly as a strategic priority, including the relevant outcomes, priorities and deliverables expected of Code Managers.

The REC already allows any Interested Person to raise a Change Proposal, and we understand that this will continue under the new Code Modification Schedule for code reform. A Data Domain Coordinator would therefore require no additional standing to raise changes under the REC, although other Codes may not provide equivalent rights. We consider that this could be addressed by giving a formally-appointed Data Domain Coordinator the standing to raise and support a modification under any relevant Code, where reasonably necessary to discharge its responsibilities. The relevant Code Manager would remain responsible for assessing and progressing the proposal through the applicable governance process; the coordinator would have no power to determine or impose the resulting change.

However, we remain open to discussing any other approaches that Ofgem believes may be more appropriate, subject to the ability of any approach to deliver the three principles above. As part of those discussions, we would welcome clarity on whether there are any interactions between Data Domain Coordinator governance and DESNZ's plans for wider energy Smart Data governance.

Placing accountabilities on Data Domain Coordinators represents only the first tier of what we consider to be the appropriate regulatory model. There is also an established precedent for placing proportionate cooperation obligations on parties whose information, systems, processes or delivery activities are necessary to achieve a regulatory outcome. For instance, the existing Duty to Cooperate in gas and electricity licences requires licensees to cooperate with Ofgem, or a person appointed by Ofgem, in responding to reasonable requests relating to planning, project assurance and coordination or systems integration where this is necessary to give full effect to the conclusions of a Significant Code Review. The obligation can include sharing information, planning changes to systems and operational processes, supporting data preparation and testing, meeting programme milestones and managing dependencies. An example is contained in Electricity Supply Standard Licence Conditions 11.13–11.15.

Ofgem has now taken forward a comparable approach for code reform through its statutory consultation published on 4 September 2026.⁴ It proposes a principles-based standard condition across gas and electricity licences requiring licensees, where reasonably requested by the relevant

⁴ Ofgem, Energy code reform – statutory consultation on modifications to the Retail Energy Code and affected licences <https://www.ofgem.gov.uk/consultation/energy-code-reform-statutory-consultation-modifications-retail-energy-code-and-affected-licences> (September 2026).

Code Manager, to take reasonable steps to cooperate in the development and delivery of Code modifications that the Code Manager reasonably considers necessary to implement, facilitate or support the SDS. The proposed obligation includes providing non-commercially sensitive information that is reasonably required to plan, assess or implement such modifications, and notifying the Code Manager where a proposed modification may have a material effect on the licensee's systems, processes or operations.

RECCo considers that the same general principle should apply to the Data Domain Coordinator model. Relevant licensees, Code Parties and, where appropriate, other data holders and users should be required to respond proportionately to reasonable requests made by a formally appointed Data Domain Coordinator within its published remit. This could include providing information needed to understand and map the domain, assess the implications of proposed changes and support the development and implementation of agreed actions. Any such requests should be transparent, linked to the coordinator's established responsibilities, the SDS or an approved delivery plan, and subject to appropriate safeguards concerning proportionality, confidentiality, data protection and duplication.

If the proposed SDS cooperation obligation is introduced, the Data Domain Coordinator function is incorporated into the Code Manager licences and NESO's relevant licences, and the development and delivery of that function is made more explicit in the SDS, then this framework may already secure a significant part of the necessary cooperation. This would be particularly the case where the coordinator is also the relevant Code Manager and the required action concerns the development of an SDS-related Code modification. However, the final arrangements would need to ensure that equivalent cooperation can be requested by NESO when acting as a Data Domain Coordinator but not as the relevant Code Manager, and from relevant participants that are not captured by the applicable licence or Code.

A duty to cooperate would not, however, make a coordinator's recommendations or decisions binding in their own right. Where a Data Domain Coordinator decision is intended to alter the obligations of third parties, or require changes to regulated data, systems or processes, it should normally be given binding effect through a modification to the relevant Code—or, where the matter falls outside Code governance, through an appropriate licence modification or regulatory direction. The coordinator may identify, raise and support the necessary change, but the relevant Code Manager should remain responsible for assessing and progressing it through the applicable governance, decision-making and appeal arrangements. Once implemented, the resulting Code or licence provision would then provide the necessary enforceable obligation.

RECCo also believes that the operational arrangements which support RECCo's and Elexon's Data Domain Coordinator obligations should be set out in the REC and the BSC respectively. We consider that using Ofgem guidance to set out this supporting detail is not a robust long-term solution since, without licence and Code changes, that guidance cannot be binding. Similarly, adherence to the Energy Digitalisation Framework is (unlike Ofgem's SDS) not required by Codes or licences. While we note that Ofgem recently introduced a new governance framework for Elexon's flexibility market facilitator role, our understanding is that this is still underpinned by BSC obligations on Elexon as well as licence obligations on other stakeholders. Placing supporting arrangements outside of Codes could disenfranchise industry stakeholders (including REC and BSC funding parties) from being able to propose changes to those arrangements.

Although we are less expert on NESO's governance arrangements, we believe that the same overall principles should apply when enshrining its Data Domain Coordinator role.

Preferred interim or transitional governance

The RECCo views set out above represent our preferred enduring governance arrangements, subject to further discussion with Ofgem.

We recognise DESNZ's and Ofgem's desire to avoid the risk that the progress of Data Domain Coordinators' role mobilisation lags significantly behind that of the in-progress digitalisation initiatives that could benefit from their coordination. RECCo considers that existing licence and Code frameworks also offer ways to embed interim programme governance arrangements – including delivery and reporting accountabilities, cooperation requirements and governance groups. We highlight, as one example, the approach taken by Ofgem to enshrining the Market-wide Half Hourly Settlement Programme within existing governance frameworks. While not all specific elements of that approach will be relevant to Data Domain Coordinators, the overall approach was to place Elexon's programme manager obligations in the BSC and implement supporting cooperation and delivery requirements on Code Managers and Code parties via changes to other relevant Codes.

Our concern with the project-style governance arrangements set out in Sections 4 and 7 of this consultation is that these could create new, parallel governance structures outside of existing industry frameworks and are focused more on short-term delivery than enduring governance. We expand on these concerns in our answers to Questions 9 and 15.

We recognise that there will be a further Ofgem consultation on Data Domain Coordinator accountability mechanisms for RECCo and Elexon. Ahead of that consultation, RECCo would be happy to discuss these points further with Ofgem and suggest how we think existing governance frameworks could most effectively deliver Ofgem's intended outcomes for the Data Domain Coordinator role.

Q7) Do you agree with the proposed funding approach for the Domain Coordinator role? If not, what alternative approach should be considered?

Yes, subject to clarification of the respective decision-making roles and the necessary REC and licence provisions being put in place.

RECCo agrees with Ofgem's proposal that the costs of performing the Consumer Data Domain Coordinator role should be recovered through RECCo's established funding arrangements. As Ofgem recognises in paragraphs 3.16 and 3.17 of the consultation, this should mean recovery through REC Parties, with any additional funding being justified, assessed and approved through the applicable regulatory route. This is preferable to establishing a separate funding mechanism.

However, we are currently unclear about the intended vires of the Digitalisation Board or Digitalisation Delivery Group (DDG) in relation to that funding. Paragraph 3.17 states that

digitalisation funding will be kept under strategic review by those bodies, but that cost recovery will continue to be managed through each organisation's regulatory, licence or code-management processes 'and not through the Digitalisation Board or DDG'. Similarly, paragraph 4.10 describes the DDG's role as providing coordination, challenge and advisory input, while paragraphs 4.13 and 4.14 describe the Digitalisation Board as a forum for strategic direction and consideration of matters including changes to the scope or funding of existing initiatives.

We understand this to mean that the Digitalisation Board or DDG may identify a need for resource, provide supporting evidence, challenge the proportionality of proposed expenditure or recommend that funding should be considered. Their conclusions could therefore constitute relevant stakeholder input and help RECCo justify a proposed funding requirement. However, neither body would itself have power to approve expenditure by RECCo or impose charges on REC Parties. Any funding proposal would still need to proceed through RECCo's established licence and REC governance arrangements. We would welcome Ofgem's express confirmation that the Digitalisation Board and DDG roles in relation to funding are advisory and strategic only, and that their decisions or recommendations would not constitute charging authority.

This distinction is reinforced by Ofgem's statutory consultation on proposed modifications to the REC published on 4 September 2026.⁴ Under the proposed Code Manager licence and REC arrangements, expenditure must relate to an authorised activity, be identified transparently in RECCo's Work Plan and Annual Budget, and be recovered through the applicable REC charging arrangements. A Digitalisation Board or DDG recommendation would not itself provide charging authority.

As explained in our response to Q6, RECCo's preference is for the Consumer Data Domain Coordinator role to be expressly incorporated within RECCo's licensed Code Manager Business. This would reflect Ofgem's stated intention that the Domain Coordinator role should be a core role for RECCo and would place its governance, accountability and funding on the clearest footing. Once that substantive role had been assigned to RECCo under the licence and REC, reasonable costs associated with its delivery could be included in the Work Plan and Annual Budget as Recoverable Costs and recovered through the Schedule 10 Core Charge arrangements.

If the role were not incorporated within Code Manager Business, we understand that it would instead need to be authorised as Permitted Business, including the Authority's prior written consent under Standard Licence Condition 17. Standard Licence Conditions 20.8 and 20.9 require the activities and costs of Permitted Business, their funding and any allocation of shared costs to be identified transparently and distinguished from Code Manager Business.

Permitted Business costs could not therefore simply be added to REC Core Charges on the strength of a Digitalisation Board or DDG decision. If Ofgem intends such costs to be funded by REC Parties, we consider that an explicit and legally effective route would need to be established in the REC, including appropriate provision in REC Schedule 10 and any necessary licence consent or amendment.

Standard Licence Condition 21.4 expressly allows an appeal of a Code Manager budget on the grounds that a Cost Item is not a Recoverable Cost, was not properly consulted upon or is an

inappropriate provision for the activity concerned. This demonstrates that neither inclusion in a Code Manager budget nor an external recommendation is, by itself, sufficient charging authority.

We therefore agree with Ofgem's proposed use of existing funding mechanisms and support a clear distinction between:

1. the Digitalisation Board and DDG's advisory and strategic role in identifying or supporting a potential funding requirement;
2. RECCo's responsibility for deciding whether to include that requirement in its Work Plan and Annual Budget;
3. stakeholders' rights to be consulted and, where applicable, to appeal; and
4. the REC and licence provisions that give legal effect to the resulting charges.

While RECCo is fully supportive of the objectives of these Data Domain Coordinator proposals and will continue to support their development and implementation as fully as possible – including work already underway to assess the scope and scale of the activity and resources that may be required – until an effective funding route has been established the resources that we can commit will necessarily be limited.

Any material expenditure should instead be identified transparently and form part of the forthcoming consultation on RECCo's Work Plan and Annual Budget for 2027/28 and subsequent years, supported by the necessary REC and licence provisions. We would therefore welcome clarification from Ofgem as soon as possible on the intended regulatory and cost-recovery arrangements, including whether Ofgem intends to direct the necessary changes or expects RECCo to raise a REC Modification Proposal. It would be particularly helpful to resolve this sufficiently early to inform the 2027/28 planning and budget process, rather than deferring the funding position until after the outcome of the October 2026 consultation on Data Domain Coordinator accountability mechanisms.

Q8) What specific KPIs or success measures for digitalisation progress could be included to measure success of the Domain Coordinator role within each domain?

RECCo agrees that a piece of work will need to be undertaken to define what success looks like for the Data Domain Coordinator role and to develop associated ways to measure coordinators' performance. However, without a fuller understanding of coordinators' remit or governance arrangements, we are unable to give a view at this time on what specific KPIs or success measures may be appropriate. We suggest that this area is therefore best considered as part of Ofgem's further planned October 2026 consultation on regulatory mechanisms for Data Domain Coordinators.

As a general principle, RECCo believes that any KPIs or success measures should be:

1. A clear, insightful and valuable demonstration of the Data Domain Coordinator's performance (i.e. attributable to the coordinator's actions);

2. Of a number and level of detail that is proportionate to the likely consequences of poor performance;
3. Framed in a way that limits the potential for unintended consequences or perverse behavioural incentives;
4. Linked to clear, corresponding governance obligations on the Data Domain Coordinator;
5. Based on clear justification for any specific performance target;
6. Supported by a method of collection that is not overly burdensome on either the Data Domain Coordinator or stakeholders;
7. Made public to domain stakeholders and the participants funding the Data Domain Coordinator's activities; and
8. Owned by the entity to whom the Data Domain Coordinator is ultimately accountable and who has the regulatory levers to compel any necessary performance improvement (e.g. Ofgem, if the KPIs are to be enshrined in Ofgem-governed licence or regulatory frameworks).

While RECCo supports the desired future outcomes listed in paragraph 3.19 of the consultation, we believe that these alone would not deliver these principles.

Section 4: Decision-making and escalation

Q9) Do you agree with the proposed governance decision-making, reporting and oversight arrangements for Domain Coordinators? Are these clear and proportionate? If not, what should be changed?

Yes, for initial mobilisation and potentially operational activities only; not for enduring governance of accountabilities.

In line with our answers to Questions 4 and 6, RECCo requests clarification of the intended remit of Data Domain Coordinators and specifically the scope of their decision-making powers and role in existing industry change processes. We note that the language of Sections 4 and 7 of the consultation (which refer to Data Domain Coordinators' decision-making) is stronger than that used in other sections such as Section 5 (which implies a less directive, guiding coordination role).

Section 4 of the consultation states that Data Domain Coordinators are responsible for decision-making in their domains (paragraph 4.1), but later clarifies that coordinators must work through existing Code, licence or industry governance arrangements (paragraph 4.3). RECCo reads this as saying that Data Domain Coordinators cannot make decisions that circumvent established industry governance and change processes, which we support as a principle. We note that to make this principle work effectively, clarity is needed on how the operators of those existing processes are expected to enact coordinator recommendations or decisions and we refer to our earlier comments under Questions 4 and 6. Code Managers and Central System Delivery Bodies (CSDBs) will be taking their strategic priorities from Ofgem's Strategic Direction Statement (SDS), their licence and Code provisions, and their own stakeholder feedback. They will be under no obligation

to accept or enact any differing priorities from Data Domain Coordinators or the Digitalisation Board, unless they are given licence or Code obligations to do so.

Other aspects of the consultation's proposed governance arrangements also appear at odds with the principle of utilising existing governance processes. For example, paragraph 4.14 states that the Digitalisation Board has responsibility for implementation routes and proposals for licence or Code changes. We are unclear what this means practically. The governance groups proposed in this consultation (Digitalisation Board, Digitalisation Delivery Group and the various DDG subgroups and workgroups) sit outside of any existing licence or Code frameworks. Membership of them does not appear to be open to domain stakeholders such as other Code Managers, CSDBs, or data holders and users – although any decisions made by these groups or by Data Domain Coordinators will rely on those stakeholders to enact them. Although DESNZ and Ofgem have powers to amend Codes directly, RECCo believes that these powers should be used by exception (e.g. to support major policy decisions) rather than routinely to circumvent existing processes.

RECCo also has concerns over the Digitalisation Board's proposed responsibility for setting Data Domain Coordinators' strategic direction. As Ofgem already sets strategic priorities for RECCo and Elexon via its SDS, this creates potential for misaligned priorities – particularly if, as stated in paragraph 4.14 of the consultation, the Digitalisation Board can change the scope or funding of digitalisation initiatives. As highlighted in earlier answers, adherence to the Energy Digitalisation Framework is not currently mandated through any licence or Code provisions and thus it also sits outside licence and Code governance frameworks.

If RECCo's and Elexon's Data Domain Coordinator accountabilities are to be enshrined via their Code Manager licences, the proposed role of the Digitalisation Board also introduces governance ambiguity and complexity. These organisations would be directly accountable to Ofgem under licence but would also be accountable to the Digitalisation Board for their coordinator actions. Similarly, they would be required to produce Code Manager Delivery Plans for Ofgem, and Data Domain Coordinator Delivery Plans for the Digitalisation Board, along with associated milestones and KPIs for each. The consultation implies that the Digitalisation Board would have a role in scrutinising Data Domain Coordinators' costs, but those costs would be funded by REC and BSC parties as part of those organisations' annual budget cycles. This risks an unclear parallel governance regime.

For the reasons set out in Question 6, RECCo considers that the proposed project-style arrangements could support mobilisation and operational coordination but should not constitute the enduring regulatory framework. RECCo and Elexon should instead be accountable to Ofgem under their respective Code Manager licences, with the Digitalisation Board and DDG performing operational, coordination and advisory functions.

Section 5: Technical requirements

Q10) Do you agree with the proposed technical requirements of Domain Coordinators, including data standards, data quality, domain definition and access to data? If not, which responsibilities should be amended and how?

Broadly yes, but with some caveats and requested clarifications. Our overarching concerns about coordinators' vires and the use of established Code and licence mechanisms are set out in Questions 6 and 9. This answer applies those principles to the proposed technical requirements.

RECCo agrees that Data Domain Coordinators' remit should be to set data standards that improve data discovery, access and interoperability to support both existing and future data-sharing use cases. We are committed to supporting these aims, both as a Data Domain Coordinator and as the REC Code Manager.

RECCo also broadly agrees with the proposed scope of Data Domain Coordinators' deliverables in this area – including the initial domain definition, proposed data standards catalogue, and supporting the development of a common ontology and overarching architectural reference framework.

However, we request clarification of the scope of Data Domain Coordinators' remit when it comes to data quality, data triage and access, and cybersecurity. This is necessary to ensure that coordinators' responsibilities are proportionate and deliverable and do not create an unclear, parallel governance regime to existing Code and licence frameworks.

Data quality

RECCo supports the objective of improving data quality but questions whether accountability for data quality sits with Data Domain Coordinators.

Paragraph 5.13 of the consultation clarifies that data holders will remain responsible for the quality of their data. It also clarifies that Data Domain Coordinators' role is to coordinate quality criteria, propose routes to support improvement and escalate issues to the Digitalisation Board. As with other coordinator functions, it is unclear whether and how Data Domain Coordinators will have the power to mandate quality criteria, or if their role is simply to recommend and set out best practice – the wording throughout Section 5 could be read as implying the latter. We also note that setting quality criteria is not necessarily the same as setting quality standards, and that any intended difference between these two terms would benefit from clarification. Paragraph 5.11 also appears to limit the scope of Data Domain Coordinators' remit, since it states that they should only set data quality criteria where such criteria are not currently set by existing processes, including Code governance processes. Finally, we note that 5.15 says that Domain Coordinators should monitor and report on data quality, including accuracy, completeness, risks, and improvement actions.

RECCo does not believe that assessing or reporting on data accuracy and quality is an appropriate role for Data Domain Coordinators. We believe that requirements for data accuracy and quality should be anchored in the Code or licence framework that governs the relevant data, with

improvements progressed through existing change and performance-assurance routes. Associated accountability for data accuracy and completeness should remain with the relevant data holder under their governing licence or Code arrangements. The Data Domain Coordinators' role should be limited to setting standards.

For example, the Smart Energy Code (SEC, administered by SECCo) governs the data standards, assurance arrangements and change process for the gas and electricity smart meter consumption data that sits in Elexon's Metering Data Domain. The Data Communications Company (DCC), as the data holder and Central System Delivery Body (CSDB), is governed by both its licence framework and the SEC. Where data accuracy and quality depend on existing Code and licence obligations, performance assurance arrangements, service provider contracts and/or established infrastructure, RECCo believes that neither Data Domain Coordinators, any future Digitalisation Coordination Function nor the Digitalisation Board should be able to create a parallel quality regime outside of those arrangements.

Finally, RECCo notes that this consultation uses the term 'data holder', which we understand may be defined in the Data Use and Access Act 2025. This terminology is different to that already defined in Ofgem's Data Best Practice (DBP) Guidance, which instead uses the terms Data Controller and Data Custodian. The consultation also uses a slightly different definition of 'data user' to that DBP Guidance. We believe that inconsistent terminology has the potential to create additional confusion about accountabilities for data quality – especially given that NESO and the DCC (as price-controlled licensees), and Elexon and RECCo (as future licensed Code Managers), are or will be required to follow Ofgem's DBP Guidance. RECCo therefore recommends that data governance terms should be standardised across all Ofgem data and digitalisation governance documents that impose obligations on Data Domain Coordinators, Code Managers and CSDBs.

Data triage

RECCo requests further clarification of expectations for Data Domain Coordinators in this area.

We note that paragraph 5.7 of the consultation says that Data Domain Coordinators should maintain a view of standards in their domain that includes the data triage sensitivity of specific data asset types. RECCo agrees that coordinators should maintain a view of the security and privacy standards governing data access within their domains, as this is relevant to their role in coordinating data access improvements. However, the actual data triage sensitivity of a specific data asset would not necessarily appear to be a data 'standard', more a classification outcome from the triage process that determines a data item's sensitivity as Open, Shared or Closed. A data asset type may contain multiple data items with different sensitivities. The sensitivity of any individual data item may also vary between different use cases for that data, e.g. depending on the required granularity of data and how it is combined with other data sets. We refer to our previous comments on this in our response to Ofgem's consultation on securing open data in energy.⁵

We are unclear as to what Data Domain Coordinators would be expected to do with this triage classification information, or how this requirement fits with the proposals in Ofgem's other

⁵ RECCo, response to Ofgem's consultation on securing open data in energy <https://retailenergycode.co.uk/our-response-to-consultation-on-securing-open-data-in-energy/> (July 2026).

consultations on securing open data in energy⁶ and DBP licence obligations for Code Managers.⁷ Those other Ofgem proposals do not mention Data Domain Coordinators; instead they place data triage responsibility with Code Managers and price-controlled licensees (as the Data Custodians), and/or the future DCF. In RECCo's response to Ofgem's securing open data consultation, we argued that the case for placing centralised data triage responsibility with the DCF was unproven. In that response, we set out why we believe that responsibility for data triage and quality should remain with the relevant Data Custodian and with the licence, Code, change and performance-assurance arrangements governing that data. We also argued that Ofgem could make fuller use of those existing licence and Code frameworks to more proportionately achieve that consultation's aims of enhancing triage consistency among Data Custodians. For the same reasons, RECCo does not believe that Data Domain Coordinators have any obvious role in the data triage process.

RECCo recognises that there could be benefit in recording data sets' triage classification within a common metadata catalogue (either across an individual domain, or across all domains), since this could help Data Custodians consider different data sets' interactions when triaging data as well as assisting stakeholders with data discovery. However, this consultation on Data Domain Coordinator guidance does not currently require coordinators to develop such a catalogue; paragraph 5.22 only requires coordinators to make recommendations to delivery bodies on consistent metadata requirements. We therefore request further clarification on the intention in this area.

Data access

RECCo supports the consultation's position that Data Domain Coordinators should seek to improve data access within their domains and we are committed to helping deliver this intended outcome, both as coordinator and as REC Code Manager. However, we seek clarity on the scope of Data Domain Coordinators' remit when it comes to requiring use of existing digital infrastructure or recommending new infrastructure.

Paragraph 5.21 of the consultation says that Data Domain Coordinators should ensure use of the Data Sharing Infrastructure (DSI) where possible and ensure use of CCS where permission from the consumer is required to enable access or sharing of data. RECCo does not believe that this proposed responsibility for coordinators is deliverable or enforceable, and again it risks creating a parallel governance regime. RECCo considers that any requirements on licensees and Code parties to use specific digital infrastructure should be embedded within the Codes or licence frameworks that govern the relevant use case and that infrastructure. Whether or not Data Domain Coordinators can themselves raise the necessary Code changes to implement such requirements depends on whether they have (or are given) powers to do so; coordinators will have no power to amend licences.

For example, one of the initial use cases for the CCS is consumer permission data that supports access to domestic consumers' half-hourly consumption data via Elexon's Smart Data Repository

⁶ Ofgem, Securing open data in energy: triage in data best practice guidance <https://www.ofgem.gov.uk/consultation/securing-open-data-energy-triage-data-best-practice-guidance> (May 2026).

⁷ Ofgem, Code manager standard licence changes: data best practice <https://www.ofgem.gov.uk/consultation/code-manager-standard-llicence-changes-data-best-practice> (July 2026).

(SDR). The permission data sits in the Consumer Data Domain and the CCS is governed by the REC. However, the half-hourly consumption data being shared because of that permission sits in the Metering Domain, and the Balancing and Settlement Code (BSC) governs Elexon's operation of the SDR and the relevant BSC data shared through it. The BSC arrangements will therefore require Elexon to verify the consumer's permission via the CCS before sharing consumer-level half-hourly consumption data via the SDR. As the CCS itself will be operated under REC provisions, the REC will require each prospective third-party user of that data to obtain and manage the associated consumer permission through the CCS. These requirements are being delivered in Elexon's and RECCo's roles as the relevant Code Managers and infrastructure delivery bodies – not as Data Domain Coordinators. This functional distinction becomes more important where the Data Domain Coordinator may not be the relevant Code Manager or delivery body.

The proposed requirements also appear contradictory. Paragraph 5.21 of the consultation requires Data Domain Coordinators to 'ensure' use of the DSI and CCS. However, paragraph 5.23 states that, where the DSI or CCS is not an appropriate route for data exchange or alternative infrastructure exists, Data Domain Coordinators should ensure these data exchange routes remain aligned with common standards and interoperability needs. Similarly, paragraph 5.26 states that Data Domain Coordinators should also ensure they understand the existing digital infrastructure and systems in place within their domains, and ensure any proposals for new infrastructure or changes to existing arrangements avoid unnecessary duplication or disruption to these.

While RECCo understands and supports the desire for greater interoperability and long-term simplification of data access arrangements, we believe that Data Domain Coordinators can help deliver this through the activities set out in paragraph 5.22 of the consultation (mapping existing access routes, identifying barriers and recommending improvements). We believe that accountability for delivering improvements to existing infrastructure should then rest with the relevant governing Code Manager or licensee. Any strategic decisions to replace or retire existing infrastructure, or develop new infrastructure, must be supported by clear business cases and consultation with the affected Code Managers, relevant delivery bodies and the funding Code parties. As outlined in our responses to Questions 6 and 9, DESNZ and Ofgem already have existing governance routes for setting Code Managers' and delivery bodies' strategic direction, as well as powers to modify Codes and licences.

While we believe that it is not the role of Data Domain Coordinators, any future DCF or the Digitalisation Board to require stakeholder use of specific infrastructure, RECCo considers that it is unclear who is responsible for setting the long-term strategic roadmap for the DSI and the CCS. This infrastructure is different to other existing sector infrastructure in that inclusion of additional use cases within its scope may require changes to existing industry solutions to those use cases. Those existing solutions may involve established infrastructure, processes and service provider contracts, and be set out in Code or licence frameworks, that are not operated by the DSI or CCS infrastructure delivery body.

RECCo therefore seeks clarity on whether Ofgem intends to use its annual Strategic Direction Statement (SDS) to set out expectations for Code Managers and Central System Delivery Bodies (CSDBs) regarding future use of the DSI and CCS. For example, in our response to Ofgem's consultation on its latest draft SDS, we highlighted that it would be helpful for Ofgem to clarify whether the SDS expectation is that the CCS should become the single long-term route for

capturing and managing consumer consent across relevant industry arrangements (including replacing existing SEC consent and smart metering data access arrangements).⁸ Currently this is unclear, and the wording in paragraph 5.3 of this Data Domain Coordinator consultation creates additional ambiguity.

RECCo considers that the Energy Digitalisation Framework alone would be insufficient to set this strategic direction. Unlike the SDS, adherence to the Digitalisation Framework is not required by Codes or licences. The framework also, by its nature, does not consider Code impacts and is unlikely to be updated frequently enough to inform annual Code budget and planning cycles.

While the SDS would therefore appear to be the most appropriate existing governance mechanism to provide cross-Code strategic direction on future DSI and CCS use, we are unclear how this fits with DESNZ's planned consultation on an Energy Smart Data Scheme and any future associated governance.

Cybersecurity

RECCo would welcome further clarification of Data Domain Coordinators' responsibilities regarding cybersecurity standards. While paragraph 5.6 of the consultation makes clear that coordinators are not responsible for cybersecurity policy, it requires them to maintain a view of cybersecurity standards across their domain. Paragraph 5.7 goes on to say that data standards may include cybersecurity, access and consent-related standards (where relevant), and paragraph 5.1 requires coordinators to identify, catalogue, recommend and maintain consistent data standards across the domain.

Our understanding is that Data Domain Coordinators should maintain a view of the security and privacy standards governing data access arrangements within their domain, not wider cyber-resilience requirements for energy sector participants. We agree that the former falls within Data Domain Coordinators' remit to coordinate data access improvements. However, we do not believe that the latter would be an appropriate role for coordinators, since this is already rightly the responsibility of DESNZ and Ofgem. We note that DESNZ and Ofgem are separately developing proposals for reshaping cyber regulation in downstream gas and electricity.⁹

Q11) Are any key technical requirements missing, unclear, not proportionate or not deliverable in practice?

While we have not identified any obviously missing requirements, as set out in our answer to Question 10 we would welcome clarification of the scope of Data Domain Coordinators' remit regarding data quality, data triage and access, and cybersecurity. This is necessary to ensure that

⁸ RECCo, Response to Ofgem's consultation on the draft second preliminary Strategic Direction Statement <https://retailenergycode.co.uk/our-response-to-consultation-on-the-draft-second-preliminary-strategic-direction-statement/> (July 2026).

⁹ DESNZ and Ofgem, Reshaping cyber regulation in downstream gas and electricity <https://www.gov.uk/government/consultations/whole-energy-cyber-resilience-requirements-reshaping-cyber-regulation-in-downstream-gas-and-electricity>

coordinators' responsibilities in these areas are proportionate and deliverable and do not create unclear, parallel governance regimes outside of licences and Codes.

Section 6: Engagement requirements

Q12) Do you agree with the proposed engagement requirements of Domain Coordinators, including strategic engagement, technical engagement, and engagement of consumer groups and smaller organisations? If not, which requirements should be amended and how?

Yes, with some caveats and requested clarifications.

Purpose of engagement

RECCo supports the aims that Data Domain Coordinators should be transparent, open and collaborative in their activities. However, we consider that the appropriate form of stakeholder engagement will depend on whether the role of Data Domain Coordinators is to provide guidance and examples of best practice, or whether they will be empowered to make decisions that require stakeholders to act. The latter decision-making role would require more formal, structured and consultative engagement that includes providing impartial, evidenced-based analysis.

As explained in our answers to Questions 4, 6 and 9 we believe that clarification of Data Domain Coordinators' remit is required. That clarification is necessary before coordinators can finalise proportionate engagement strategies.

Overall coordination of engagement and strategic engagement requirements

Notwithstanding the above caveat, RECCo agrees in principle with the proposal for a stakeholder engagement strategy. We do, however, have concerns about potential overlap in engagement activity between coordinators. While the consultation notes the need for cross-domain stakeholder engagement on cross-domain work, we consider that even within-domain engagement activities have the potential for overlap where the same stakeholders are mapped to more than one domain. While the data types in each domain will differ, there will be equivalent engagement topics for each domain. Care therefore needs to be taken to avoid overburdening stakeholders and causing engagement fatigue.

RECCo is committed to working with the other Data Domain Coordinators to ensure that the same stakeholders are not asked to engage more times, or with more entities, than is necessary to support coordinators' work. We are also committed to undertaking this engagement in the way that adds most value to stakeholders, not just to the coordinators. In line with our earlier answer to Question 5, the ongoing effectiveness of Data Domain Coordinators' cooperation in this area could be reviewed during the initial period of working, to establish if this is an area in which an overarching Digitalisation Coordination Function could add any future strategic coordination value.

We note that Section 6 of the consultation appears to use the terms strategy and plan interchangeably and we ask that the intention be further clarified. This is because we consider that

there is a potential difference between an engagement strategy (which could be focused on long-term direction, scope and outcomes) and an engagement plan (which could be updated more frequently and focused on short-term activities to achieve the strategy).

RECCo agrees with the consultation's position that, wherever possible, Data Domain Coordinators should use existing stakeholder engagement forums or mechanisms, including those already established under Codes. This avoids unnecessarily creating new forums or mechanisms that require associated industry resources. However, we consider that a coordinator's engagement should not be limited only to forums that it already leads as the relevant Code Manager, given that these are usually Code-specific while data domains and use cases can be cross-Code. Again, this demonstrates the need for coordinators to join up their engagement plans.

Technical engagement requirements

RECCo agrees with the need for Data Domain Coordinators to undertake technical engagement with stakeholders, subject to our requested clarifications on Data Domain Coordinators' remit in the areas set out under Question 10.

Engagement with consumer groups and smaller organisations

RECCo agrees that Data Domain Coordinators should engage with consumer bodies to ensure focus on consumer outcomes. However, we note that the consultation requires this engagement 'where appropriate'. For the avoidance of doubt, we believe the guidance should clarify that engagement with consumer bodies should not be limited to the Consumer Data Domain. All parts of the energy system need to work in the interests of consumers, and so all coordinators should be required to include consumer bodies in their engagement plans (albeit noting that not all consumer body engagement topics listed in paragraph 6.11 of the consultation will be relevant to all domains).

RECCo also agrees that Data Domain Coordinators should engage with all stakeholders within their domain, regardless of their size or length of sector participation. We note that the consultation requires coordinators to engage with innovators and new entrants on emerging use cases as well as on technical and operational requirements for new products, services or initiatives. As domains can span Codes, we consider that this is another area where Data Domain Coordinators will need to work closely with other Code Managers such as SECCo. Code Managers themselves are likely to have direct intelligence in this area, gained from managing new Code party accessions and data access requests.

Similarly, RECCo agrees with the proposed requirement for Data Domain Coordinators to support domain participants by signposting key contacts across the domain, but we believe that the list of key contacts in 6.17 should include Code Managers. This is because data types within a domain could be governed by Code Managers other than the coordinator itself (for example, the Metering Data Domain includes both BSC-governed and SEC-governed data).

Q13) Which strategic, technical, consumer group or smaller organisation stakeholders or stakeholder groups should be engaged for each domain?

RECCo believes that this is best confirmed after Data Domain Coordinators have completed their initial domain definitions and stakeholder mapping exercise.

As per our answer to Question 12, we believe that the need for consumer body engagement is not limited to the Consumer Data Domain.

Q14) Are any key engagement requirements missing, unclear, not proportionate or not deliverable in practice?

Yes, in part. As highlighted in our answer to Question 12, RECCo believes that it may be challenging to produce an effective stakeholder engagement strategy without clarification of whether Data Domain Coordinators' remit is intended to be guiding or directing.

For example, the stakeholder engagement requirements in Sections 6, 6.5 and 6.20 refer to coordinators' decision-making while 6.21 refers to sharing best practice.

Section 7: Governance and operational requirements

Q15) Do you agree with the proposed governance requirements of Domain Coordinators including requirements to participate in governance forums and operational reporting? If not, which responsibilities should be amended?

Yes for initial mobilisation and potentially operational activities only; not for enduring governance of accountabilities.

Initial deliverables

RECCo notes the requirement on Data Domain Coordinators to produce three initial deliverables for the October 2026 Digitalisation Board meeting (domain definition, stakeholder mapping, and role scoping/delivery plan). We are working to produce these and are collaborating with Elexon and NESO to ensure consistency.

Where our answers to Questions 4, 6, 9 and 10 request clarification on aspects of Data Domain Coordinators' role, we would appreciate an early response from Ofgem to ensure that we can align these deliverables with regulatory expectations.

Enduring governance

In line with our answers to Questions 6 and 9, RECCo believes that the project-style governance set out in Section 7 is unlikely to be a robust long-term governance structure. We refer to our explanation and suggestions under those answers and would be happy to discuss these further with Ofgem.

For the avoidance of doubt, RECCo highlights that we do not object to being a member of the Digitalisation Delivery Group (DDG) or the Digitalisation Board. Nor do we object to reporting to those groups on our Data Domain Coordinator plans and activities. Our concerns are that, for consistency with the rest of RECCo's governance and existing industry frameworks, we believe we should be ultimately accountable to Ofgem as the regulator for our performance in the coordinator role.

While not repeating the views from earlier answers to Questions 6 and 9, RECCo has the following comments on the requirements set out in Section 7:

- Paragraphs 7.2 and 7.8 repeat the lack of clarity on Data Domain Coordinators' decision-making remit, by referring to coordinator decision making but also requiring use of existing governance mechanisms where possible. We request clarification of what is meant by the requirement in 7.8 for coordinators to engage with accountable Code and licensed bodies to avoid duplication or conflicting requirements. We consider that it is unclear whose requirements are intended to take precedence in the event of any disagreement or conflict.
- We agree that the DDG has a valuable function in achieving cross-sector cooperation between Data Domain Coordinators, DESNZ and Ofgem. However, we consider that neither the DDG, nor its subgroups or workgroups, should be able to become a substitute for wider stakeholder engagement and input.
- We request clarification on the deliverables mentioned under the reporting requirements in paragraphs 7.17-7.19. These require Data Domain Coordinators to identify domain-level outcomes required to improve standardisation and interoperability, maintain a comprehensive view of digitalisation initiatives within their domain (including a central map of key deliverables and interdependencies), and assess and track how individual initiatives contribute to domain-level deliverables (including monitoring progress and assessing risks). If these are intended to form part of coordinators' domain definitions and delivery plans, then we suggest that these should be drawn out more explicitly within the earlier descriptions of those deliverables.
- We request clarification of the requirement in paragraph 7.22 that Data Domain Coordinators should communicate independent routes for stakeholders to raise concerns with Ofgem and DESNZ without involving the coordinator. We are unclear as to whether such routes exist; we also suggest that stakeholder feedback on coordinators' performance should be captured as part of overall success measures. For example, Ofgem could conduct (or require Data Domain Coordinators to conduct) a stakeholder survey on coordinators' performance.

Q16) Are any key governance requirements missing, unclear, not proportionate or not deliverable in practice?

Yes. Please see our points under Question 15 above.