



CCS REC drafting consultation

Webinar Questions and Answers

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Contents

Contents	2
Introduction	3
1. Impact of the Elexon SDR Consultation on MMP	3
2. Energy Supplier Roles and Obligations	3
3. Token Validity and Consent Status Updates	3
4. Consumer Journey Testing and Drop-off	4
5. Housing Associations, ATPs and Intermediaries	4
6. Inclusion of Domestic Gas Data	4
7. Applying Open Banking Principles to CCS	5
8. Permissions in Multi-occupancy Properties	5
9. Reconciliation of Permission Records	5
10. Elexon Data and Consent Requirements	5
11. Transition of Existing SEC and Supplier Permissions	6
12. Consumer Experience Requirements and Guidelines	6
13. The Non-domestic CCS Proposition	6
14. ATP Testing, Assurance and Costs	7
15. Identity Verification for Different Use Cases	7

Introduction

This document brings together the questions submitted during the CCS REC drafting consultation webinar on 29 September 2026. Questions covering the same or closely related topics have been grouped and answered together. Each of the original questions is reproduced as asked, with a combined response addressing the full scope of the questions in that group.

1. Impact of the Elexon SDR Consultation on MMP

Is the Ofgem consultation on Elexon's SDR likely to impact MMP go-live?

Based on current timelines, we do not expect the Ofgem consultation on Elexon's SDR to affect MMP go-live. We remain in close discussions with Elexon and Ofgem and will continue to monitor developments over the coming weeks and months.

2. Energy Supplier Roles and Obligations

Are energy suppliers expected to deliver functionality ahead of Tariff Interoperability Phase 1b?

Can you confirm what the obligations are for energy suppliers during MMP?

Are energy suppliers expected to deliver functionality ahead of tariff interoperability phase 1b where they will be the EDH for tariff data?

Account specific tariff information is highlighted as part of the next major milestone post MMP. Energy Suppliers are expected to become CCS users for ID Verification. Can you clarify the role energy suppliers will play in that? E.g Is it as EDH or only for ID verification?

Energy suppliers are not required to deliver functionality for the CCS MMP go-live. The exception is where a supplier chooses to access personal data from Elexon's SDR for activities outside its existing supplier licence activities, such as providing additional products or services. In that situation, the organisation would need to participate as an Authorised Third Party (ATP), and a valid CCS permission would be required before the SDR could release the data.

Tariff Interoperability Phase 1b is a separate, later use case. Ahead of its planned November 2027 go-live, suppliers will need to develop and test the functionality required to support account-holder verification and to act as Energy Data Holders (EDHs) for account-specific tariff information. Suppliers are therefore expected to play both roles: authenticating consumers through their online accounts as part of the identity-verification journey, and making account-specific tariff information available to authorised RTI Users where a valid CCS permission is in place.

3. Token Validity and Consent Status Updates

Why is the token only valid for 30 minutes?

Will the use of the Shared Signals Framework (SSF) be mandatory for EDHs?

The 30-minute token validity period was established through extensive CCS working group testing. It limits the period during which data could continue to be shared after permission is revoked, supporting the CCS ambition for revocation to operate as close to real time as possible. It also reflects models used in other smart data schemes, such as Open Banking, supporting future trust and interoperability objectives.

The Shared Signals Framework (SSF) is related to this control but will not necessarily be mandatory for every EDH. Its use will depend on the needs of the particular use case, including whether an EDH must receive an update, such as a change in permission status, before sharing data. Where SSF is required, it provides a standardised webhook

mechanism for communication between EDHs, ATPs and CCS, allowing a common technical approach to be reused rather than creating bespoke signalling arrangements for each use case.

4. Consumer Journey Testing and Drop-off

Have CCS tested the end-to-end process a consumer would have to take on an actual system?

Have you assessed the percentage of consumers dropping off during onboarding flows that are lengthy or redirect them to other, unfamiliar parties?

We have tested significant elements of the anticipated consumer journey, but the full end-to-end journey is still being built. We do not yet have a specific figure for consumer drop-off. This will be assessed through Wave 3 research once the complete journey can be tested with consumers before MMP go-live, allowing us to validate the experience and identify opportunities for improvement.

We will continue to monitor the live experience and use consumer research, accessibility testing and feedback from consumer organisations to identify ways to reduce drop-off and improve the journey. A key benefit of CCS is that improvements can be made once to the shared journey, allowing the whole ecosystem to benefit from learning gained through live operation and consumer feedback.

5. Housing Associations, ATPs and Intermediaries

What can housing associations do to support uptake amongst our residents?

Are you expecting any third party wanting to access customer-level SDR HH data to become an ATP themselves, or can they go through another company acting as an ATP on their behalf?

Housing associations are an important potential use case for CCS. Where residents' half-hourly energy data is available through Elexon and the SDR, we can work with housing associations to enable participation. A housing association, or any other organisation that meets the CCS definition of an ATP and interacts directly with consumers to obtain permission, will need to onboard to CCS and enter into the relevant access agreements.

Technology providers or intermediaries may support an ATP with technical integration and would not necessarily need to become CCS participants themselves. The ATP would remain responsible for complying with the relevant CCS requirements. We are open to working with potential technology providers and intermediaries to make integration as straightforward as possible.

More broadly, housing associations can support uptake by helping residents understand their energy data, how it can be used and how CCS gives them greater control over data sharing. Annex 1 of the CCS Arrangement Schedule sets out the Consumer Experience Requirements and provides a consistent framework for communicating this to consumers.

6. Inclusion of Domestic Gas Data

Domestic gas HH data is very similar to electricity HH data from the perspective of consumer consent. Why is MMP excluding it?

Gas is an area we intend to address through future CCS evolution. For MMP, the initial Energy Data Holder is Elexon, which does not hold the relevant gas data. The necessary data-provision and matching arrangements are therefore not available for gas from day one. We intend to bring gas data into CCS once those arrangements are in place.

7. Applying Open Banking Principles to CCS

Can you elaborate on how the Open Banking principles match the energy sector's needs?

Isn't Open Banking only used by organisations regulated by the FCA, and therefore a relatively small number? CCS is likely to have many more participants, particularly as ATPs will not necessarily be regulated.

Open Banking provides relevant principles for permission-based data access, trust and secure data sharing. CCS applies these principles through its trust framework, participant directory, assurance standards and token-based access model. This gives participants confidence that organisations requesting data are authorised and that data can be accessed only where the appropriate permissions are in place.

Open Banking is regulated, but it is not limited to a small number of organisations: it currently includes 326 regulated providers, including 238 third-party providers, with 140 regulated entities offering live services. The relevant difference for CCS is that some ATPs may not otherwise be subject to sectoral regulation or licensing. The REC addresses this through onboarding and binding access agreements, creating consistent trust, assurance and accountability while supporting participation at scale.

We are also considering the longer-term regulatory landscape, including the Smart Data Scheme and the Data (Use and Access) Act, so CCS can evolve alongside wider data-sharing frameworks and support future interoperation.

8. Permissions in Multi-occupancy Properties

How will it work in multi-occupancy properties where there is no record of all adult occupiers in the property?

Any individual living in a multi-occupancy property can provide permission in their own right. They will complete the relevant identity-verification and occupancy checks to establish their link to the property and their authority to give permission for the data. There will also be a dispute route for household members who wish to challenge or query an existing permission.

This approach has been informed by industry engagement, discussions with DESNZ, Ofgem and the ICO, and our own legal advice. Further detail is included in the relevant consultation material.

9. Reconciliation of Permission Records

Can you elaborate on the requirement to regularly reconcile permission data, at least quarterly? Is there a batch process for this?

ATPs will be required to reconcile their permission records with the permissions held by CCS at least quarterly, ensuring their records remain aligned with the CCS central ledger. The central ledger gives ATPs a single record of permissions that they can query through the CCS API, helping to minimise discrepancies across the ecosystem.

The detailed reconciliation process, including whether it is carried out as a batch process, is set out in the relevant AMLs and API technical specification.

10. Elexon Data and Consent Requirements

Are Elexon requiring consent for all their data items?

No. Elexon is defining which data items require permission based on the nature of the data. For domestic consumers, the key consideration is whether the information constitutes personal data. Personal data will require permission to be shared through CCS, whereas aggregated or otherwise non-personal data may not.

Elexon can provide further detail on the specific data items and permission requirements. We also expect to hold joint sessions with Elexon and participating ATPs ahead of MMP go-live to ensure alignment.

11. Transition of Existing SEC and Supplier Permissions

Is there a gap between SEC and CCS where consumers have given consent through SEC?

Are you still expecting the CCS to include Energy Supplier HH data permissions?

There will be a transitional period while existing SEC arrangements and CCS operate alongside each other. For MMP, CCS is initially focused on new permissions for ATPs that onboard to access Elexon's SDR. There is no expectation that existing energy-supplier permissions for half-hourly data will be migrated to CCS for MMP.

We are working with SECCo to determine how existing permissions and arrangements should transition to CCS, including how permissions established under the SEC should be treated. Migration of existing supplier permissions may be considered as part of the future CCS roadmap, but would be subject to Ofgem making the necessary changes to supplier licence conditions. This work will be developed further with SECCo, Ofgem and government.

12. Consumer Experience Requirements and Guidelines

What is the status of the consumer experience guidelines? I believe they are non-mandatory guidance that CCS users should be aware of and consider, but are not required to adhere to. Is that the case?

There are two separate elements:

- **Consumer Experience Requirements** are set out in Annex 1 of the CCS Arrangement Schedule and are mandatory for relevant ATPs through the CCS arrangements and access agreements.
- **Customer Experience Guidelines** are separate Category 3 guidance intended to help organisations implement those requirements. They provide practical examples and guidance but are not themselves mandatory.

13. The Non-domestic CCS Proposition

Why is non-domestic key to CCS? What problem would CCS be solving for non-domestic consumers?

When it comes to the non-domestic sector, will the costings and assurance processes be adapted to reflect the different characteristics of the market?

CCS could provide the non-domestic sector with a consistent approach to permission-based access to energy data, helping to address fragmentation across existing arrangements. The intention would be to provide a common framework covering trusted participants, data access, directories and permissions. This would give non-domestic consumers greater confidence, trust and control over who can access and use their sensitive energy data, while making it easier for organisations to obtain the data they need to develop services supporting flexibility, net zero and other market needs.

We intend to reuse the token-exchange model established for CCS MMP rather than redesigning the underlying technical approach. However, the non-domestic user journey, the appropriate authority pathway for giving permission, costings and assurance processes have not yet been formally assessed. These elements are expected to reflect the specific characteristics and requirements of the non-domestic market and will form part of the design work.

Any future development will be considered against the business case, consumer benefit and evolving regulatory requirements. We will engage with industry and undertake the necessary assessments before introducing non-domestic arrangements.

14. ATP Testing, Assurance and Costs

Do ATPs have to do any testing with REC and, if so, is there any cost?

Yes. ATPs will be required to complete testing as part of the onboarding process. The detailed testing approach and associated costs are being finalised. ATPs will also need to complete the Information Security and Data Protection (ISDP) assessment; the consultation document sets out the indicative costs associated with that assessment. ATPs will be responsible for their own internal testing costs.

15. Identity Verification for Different Use Cases

Will CCS be able to support different levels of IDV for different future use cases? The requirements for accessing HH consumption data via the SDR might not be appropriate for future use cases involving less personal data.

Yes. CCS is designed to support different levels of identity verification depending on the requirements of each use case. For example, Tariff Interoperability uses supplier-held information to verify the account holder, providing a different verification approach from that required for access to half-hourly metered data through the SDR.

Thank you for reading

We hope you found this document helpful. If you have any questions or want to keep up to date with our latest news, please contact us below.



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