

Consumer Consent Service

Consultation Webinar

29 September 2026

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#4010327



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- We encourage you to submit questions throughout the event using Slido
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- The recording and presentation slides will be made available on our website and communication channels following the event



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Agenda

01

Welcome
& introductions

02

Why CCS is needed

03

How we reached
this position

04

How CCS will work

05

What the MMP
delivers

06

How CCS is
expected to evolve

07

What we need
from you

08

Q&A

Why is CCS needed?

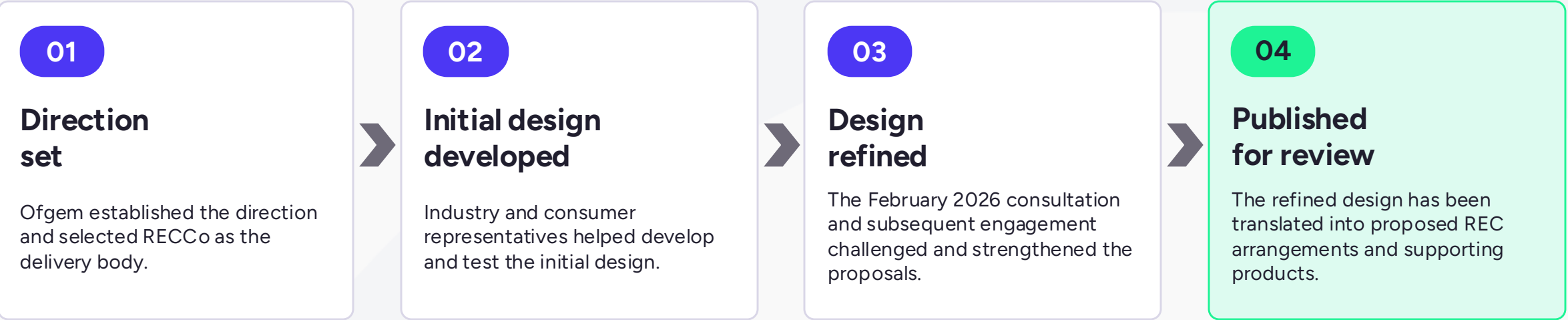
A common trust and permission framework for consumers, service providers and data holders



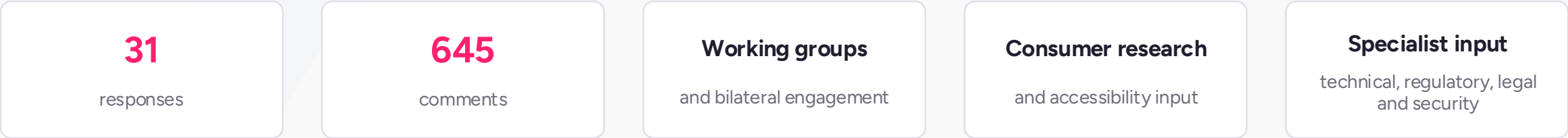
Qualify once through the common CCS framework, then reuse that trust across enabled services and datasets

How consultation and evidence shaped the proposals

Each stage has been tested through engagement, challenge and evidence



Consult → Test → Refine → Translate → Consult



We are now asking organisations to test whether the proposed arrangements work in practice.

How feedback has shaped the current design

Five material developments since the February 2026 Design consultation

1 A focused first implementation

What feedback highlighted

Feedback supported phasing, but sought clearer value and long-term direction.

Current position

MMP applies reusable CCS capabilities first to domestic half-hourly electricity data.

Rationale

Deliver usable benefit sooner without the risk and complexity of launching every future use case at once.

2 Proportionate verification

What feedback highlighted

Photographic ID as the normal route raised concerns about friction, accessibility and inclusion.

Current position

Identity and current occupancy are separate outcomes. GPG45 Medium is the normal identity baseline, with multiple evidence routes.

Rationale

Maintain assurance without prescribing one route. Photographic ID is optional, fallback or step-up.

3 Local token validation

What feedback highlighted

Mandatory introspection raised concerns about cost, latency, complexity and central dependency.

Current position

EDHs locally validate CCS-issued signed access tokens with a maximum 30-minute lifetime.

Rationale

Reduce request-time dependency, latency and transaction volume while retaining a common verifiable credential.

4 Clear accountability boundaries

What feedback highlighted

Feedback and further engagement required a clearer distinction between regulatory permission and data-protection duties.

Current position

CCS obtains, manages and evidences regulatory permission in support of each organization's responsibility for UK GDPR lawful basis and wider compliance.

Rationale

Clarify what the CCS record demonstrates and what remains with ATPs, EDHs and other organisations.

5 Aligned language and roles

What feedback highlighted

Legal review and wider smart-data alignment required clearer, more consistent terminology.

Current position

Governance uses "permission"; Energy Data Provider becomes Energy Data Holder; "energy data subject" covers an occupier or account holder.

Rationale

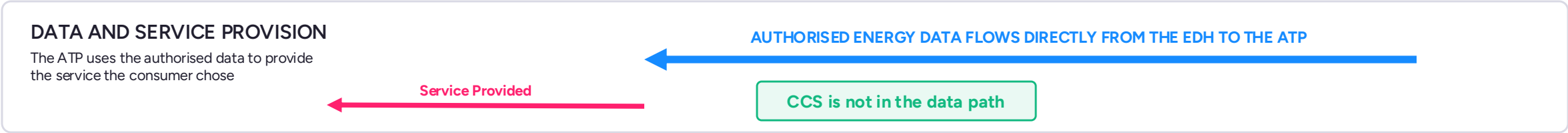
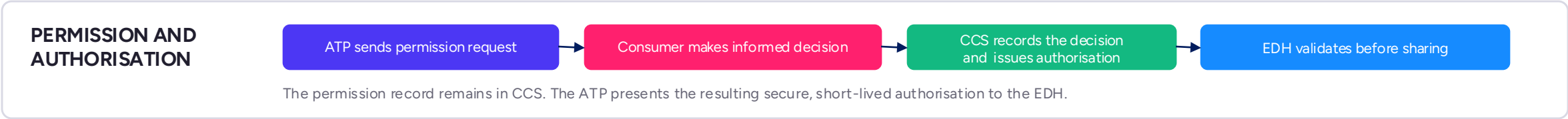
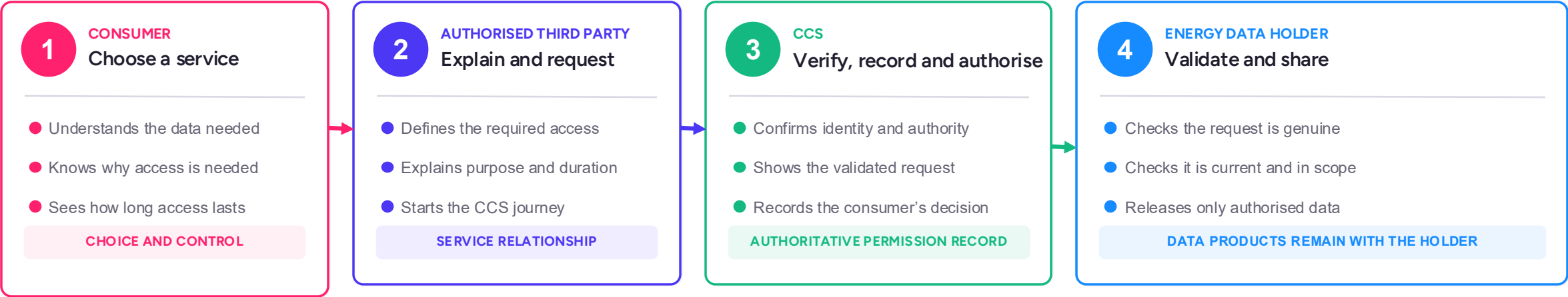
Avoid confusion with UK GDPR consent and align CCS with the wider framework. Consumer-facing wording remains under consultation.

Overall direction retained: targeted changes make CCS more focused, proportionate, resilient and clear to implement.

How CCS works

The consumer chooses a service, CCS provides trusted permission and the data holder releases only the authorised data

HIGH LEVEL VIEW OF THE END-TO-END GRANT SERVICE JOURNEY

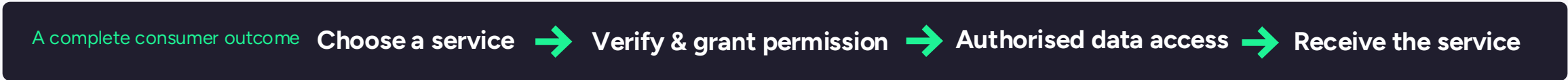


CCS turns the consumer's decision into enforceable authorisation while energy data continues to flow directly between the EDH and ATP.

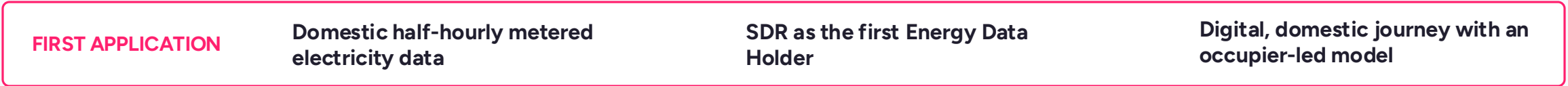
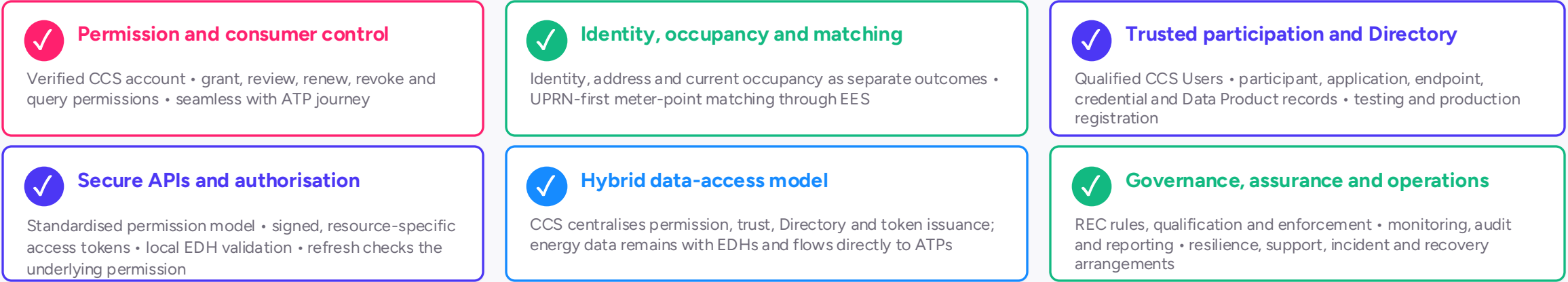
The MMP establishes a working CCS, not just a first use case

The confirmed MMP brings together reusable permission, trust, verification, authorisation, governance and assurance capabilities

Roadmap Phase:



WORKING CCS • REUSABLE FOUNDATIONS



Focused does not mean incomplete: MMP establishes the full CCS pattern through a controlled first application.

MMP is the foundation for an evolving CCS

Next and Later describe present maturity and direction, not committed delivery dates or sequencing

Roadmap Phase:



THE SAME CCS TRUST, PERMISSION, QUALIFICATION AND AUTHORISATION FOUNDATIONS

MMP

✓

Established

Confirmed MMP and proposed REC baseline for the initial CCS implementation.

Applied first to domestic half-hourly metered electricity data.

The platform from which expansion can begin.

NEXT

More developed post-MMP candidates

Tariff Interoperability Phase 1b

Account-holder verification • tariff permissions • consumer experience • supplier participation through CCS

Access And Journeys

Additional identity providers and reusable assertions • assisted and non-digital routes

Adoption And Operation

Wider SEC Other User participation • address-change and home-mover management • operational learning • system data for consumer visibility

LATER

Potential expansion requiring further decisions

More Data

Gas consumption and MPRN matching • PSR • assets and asset control

More Consumers

Non-domestic and delegated-authority models • dataset-specific verification profiles

More Integration

Direct DCC integration or DCC SMEDR participation if progressed • wider Smart Data

More Permission Models

Pre-existing permission migration • other lawful-basis schemes where enabled

PROGRESSION DEPENDS ON

consumer and market need • EDH and external-service readiness • policy and regulation • governance, funding and value • technical feasibility and implementation readiness

MMP delivers the reusable capability; future scope progresses through evidence, dependencies and the REC Change Process.

What we are asking you to consider

Two connected parts: the reined design and its translation into REC arrangements

Part A – Design conclusions & rationale

- Refined design
- Changes since February
- MMP scope
- Route to wider vision
- New material evidence

Is there new evidence or an unaddressed issue?

Part B – Workable arrangements

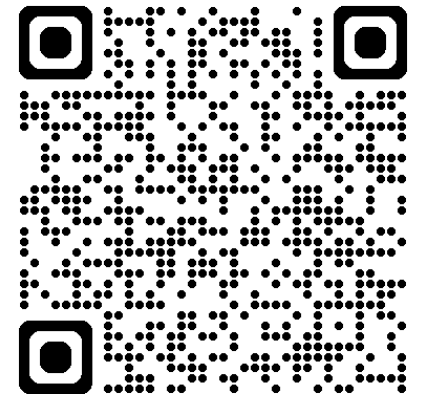
- Core CCS rules
- Participation and assurance
- Consumer experience
- Technical specification and service definition

Are the resulting obligations workable?

This is neither..... nor

a complete restart of
the CCS design
or
a legal drafting exercise
with no implementation
consequences

Consumer Consent
consultation webpage



The central consultation question

Are the proposed REC arrangements clear, complete, proportionate and workable, with appropriate responsibilities and without unnecessary duplication or prescription?

Where we need you to focus your response

Bring together legal, policy, consumer, operational, commercial and technical perspectives

1. Completeness

Does the proposed suite of REC products cover everything needed to deliver the MMP?

Organisation-wide review

2. Responsibilities & obligations

Are the roles and obligations of RECCo, CCS Users, ATPs and Energy Data Holders clear and workable?

Legal • Policy • Operations

3. Qualification, assurance & monitoring

Are the requirements, including ISDP and reporting, proportionate to the risks?

Security • Data protection • Assurance

4. Consumer experience

Will the journeys support informed choice, accessibility, understanding and control?

What terminology will consumers understand: "permission" or "consent"?

Consumer • Accessibility • Communication

5. Technical & data implementation

Can your organisation implement the APIs, security arrangements, messages and data items?

Are there gaps, ambiguities or unintended consequences?

Technical • Data • Operations

6. Permission purposes

Which permission purposes does your organisation currently use, or expect to use?

Product • Commercial • Legal

For each issue: identify the provision, explain the practical impact, provide supporting evidence and suggest an alternative.

Q&A

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Thank you for joining us!

Consultation close date – 19 Oct 2026

Please complete the response form and submit it to the
CCS consultation mailbox:

consumerconsent@retailenergycode.co.uk

Consumer Consent Hub
on the RECCo website



The Consumer Consent Project is live, and we want to hear from you. Whether you have a question or concern or want to stay in the loop, our team is here to collaborate.

✉ Reach us at: **consumerconsent@retailenergycode.co.uk**

Your feedback plays a key role in shaping a secure, consumer-centric service.