

By email only: FMAR.programme@elexon.co.uk

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RECCo response to: FMAR Design and Implementation Industry Consultation

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 on our existing role as 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. FMAR has the potential to reduce duplication, improve the quality and accessibility of flexibility asset data and support the growth of consumer-led flexibility. Our response focuses on the interfaces with consumer and retail-market arrangements, rather than the detailed technical and operational design applicable principally to direct FMAR participants.

Consistent with our recent response to Ofgem's consultation on Data Domain Coordinator role guidance, RECCo supports FMAR as a significant delivery initiative within the Behind-the-Meter Asset Data Domain. Its development should be incorporated into the relevant Domain Coordinator roadmap and governance arrangements, while maintaining a clear distinction between Elexon's domain-coordination role and its role as FMAR delivery body and operator. Cross-domain design with the Consumer Data Domain - and particularly the relationship between FMAR and the Consumer Consent Solution (CCS) - should begin during the initial design phase rather than being treated solely as a future enhancement.

Against that background, we draw out three points:

- 1) **Cross-domain design should begin now.** The consultation identifies integration with CCS as a potential future development. However, identifying and managing cross-domain dependencies is a core part of the proposed Data Domain Coordinator framework. Elexon and RECCo should therefore establish the relevant design and governance principles during the current phase, even if technical integration follows later. These should address the matching of consumers, premises, FSPs and assets; the distinction between consumer consent, an FSP's contractual authority and other lawful bases for processing; withdrawal of consent or authority; onward sharing; data correction; and asset-registration lifecycle events. Our early engagement with Elexon has been constructive, and we have agreed to jointly map the end-to-end consumer journey ahead of the December Digitalisation Delivery Group (DDG).
- 2) **The proposed 'single source of truth' must be clearly bounded.** FMAR may be authoritative for the flexibility asset-registration record within its defined scope, but it should not displace CCS as the authoritative source of relevant consumer permissions, REC-governed metering and registration data, or other registers responsible for connection, installation or compliance information, including any central register of low carbon technology assets that Ofgem may establish. The design should identify field-level data ownership and mastership, authoritative sources, validation and correction responsibilities, and how changes are synchronised without creating competing identifiers or inconsistent records.

- 3) **Governance and accountability should remain federated and use the appropriate regulatory routes.** FMAR spans the Behind-the-Meter Asset, Consumer, Metering and Core Energy System Data Domains. Domain allocation and governance should therefore be determined by the relevant data fields, use cases, existing governance arrangements and practical delivery levers, rather than by the system in which data happens to be held. Elexon's roles as Domain Coordinator, Market Facilitator and FMAR delivery body should be clearly distinguished. Binding obligations and expenditure should be established through the applicable Flexibility Market Rules, licences, contracts or Industry Codes; cross-domain bodies should coordinate and recommend, but should not bypass REC governance or impose costs on RECCo or REC Parties without the appropriate authority, assessment and approval.

We would be happy to discuss any of the points raised in this response.

Yours sincerely,

Jon Dixon
Director, Strategy and Development

Appendix: RECCo response to consultation questions

Q1: Please provide your feedback on any significant technical or operational constraints or gaps you have identified with the design, which would prevent integration into your systems.

We encourage you to refer to the following artefacts to support your response:

- **Data and Interface Specification**
- **Business Processes & Use Cases Miro Board**
- **Design Guidance (including Design Principles, Functional & Non-Functional Requirements and Security Requirements)**
- **Logical Entity Relationship Diagram**
- **FMAR API Specification**

RECCo does not currently identify any fundamental technical or operational constraints that would prevent integration with FMAR. However, we consider that several design aspects require further development to support future interoperability and avoid unnecessary rework.

In particular:

- The governance of FMAR data item and message definitions requires clarification, in particular we assume that once the content of the interface specification is agreed, it will be held in the Energy Market Data Specification (EMDS) alongside other energy market metadata, providing a single source of truth for those definitions. The inclusion of this content into the EMDS requires RECCo implementation activities to be recognised within the FMAR delivery plan.
- The business processes and use cases are currently focused on market participants and asset registration activities, and the published customer journeys do not yet extend to the end consumer. Additional consideration should be given to the end consumer journey, particularly where future arrangements may require visibility of asset flexibility participation, permissions and control arrangements. This should recognise that the organisation a consumer contracts with may not be the FSP that registers the asset, and that the relevant consumer may be an asset owner who is not the occupier, such as a landlord or housing association.
- As discussed with Elexon during recent engagement sessions, future integration with the Consumer Consent Solution (CCS) should be reflected within current design and security considerations. Even if technical integration is not delivered in the initial phase, FMAR should be designed to remain compatible with future CCS requirements, including security, identity, permissions and auditability frameworks.
- Clear ownership and governance of consumer, asset, premise and participant identifiers will be required to avoid duplicate records, conflicting authoritative sources and complex reconciliation processes.

Overall, we support the current direction of travel but believe early consideration of these cross-domain dependencies will reduce future implementation costs and complexity.

Q2: Do you need further information to design, build and test your systems and processes to integrate with FMAR that is not listed in this consultation? Please explain what further information is required.

At this stage, RECCo does not identify any specific information gaps that would prevent us from continuing to assess FMAR design and implementation proposals. However, to assess the interfaces with CCS and REC arrangements in more detail, it would be helpful for Elexon to set out:

- how asset ownership is, or will be, recorded and evidenced, including where the asset owner is not the occupier;
- which asset identifiers and data items are expected to be shareable with other services, to inform early work on permissioned access via CCS.

We welcome the engagement that Elexon has recently undertaken and expect requirements to continue to evolve through ongoing design activity. We therefore support continued collaboration between Elexon, RECCo and other stakeholders to explore:

- consumer and asset owner identification approaches;
- future CCS integration;
- cross-domain data governance arrangements;
- asset lifecycle management processes; and
- interoperability with wider data sharing and Smart Data initiatives.

We anticipate that further detail on these areas will be developed to support the upcoming governance and market-rule consultation and look forward to helping shape the governance design through the extension of customer journeys to include consideration of end consumers.

Q3: Do you agree with Elexon's proposed legal and governance approach for Day 1 migration and enduring FMAR operation? (Agree / Broadly agree with some refinements required / Don't agree)

If you don't agree, please provide reasons for your response, including any concerns about legal basis, migration controls, participant obligations, FSP onboarding assurance, controlled asset lookup, access controls, data sharing, retention, lifecycle/offboarding or enduring governance.

Response: Broadly agree with some refinements required.

RECCo supports the overall direction of the proposed legal and governance framework and recognises the need to establish a practical route to Day 1 operation.

However, we believe further work is required in relation to:

- governance of consumer permissions and asset-owner authority;
- the interaction between contractual authority and consumer consent;
- oversight of market participant interactions with consumers;
- management of trust and confidence in flexibility markets; and
- alignment with future Consumer Data Domain arrangements.

In particular, we consider that establishing a clear and trusted framework for identifying asset owners, recording permissions and managing ongoing authority should form part of the enduring governance design rather than being treated solely as a future enhancement.

We support ongoing collaboration between Elexon and RECCo to develop these arrangements.

Q4: In your opinion, what are the top five developments that should be in the scope of the next phase of FMAR?

Please prioritise your answer by importance from 1 (most important) to 5 (least important), together with your rationale, including benefits of future developments.

1. Consumer Consent Solution (CCS) integration

The interaction between flexibility assets, asset ownership, permissions and consumer control should be a priority future development. While technical delivery may occur in a later phase, the roadmap and target operating model should be defined now.

2. Consumer permissions and asset-owner governance

A clear framework should be established for recording, maintaining and withdrawing permissions and authority associated with assets participating in flexibility markets. This needs policy direction on who the relevant consumer is (most likely the asset owner), a means of verifying ownership, and rules on how a withdrawal of permission interacts with existing flexibility contracts.

3. Cross-domain governance and interoperability

FMAR should be developed in alignment with the Consumer, Metering and wider energy data domains to support consistent governance and avoid duplication, including consistent API security, identity and accreditation standards across FMAR, CCS and the DSI.

4. Simplification of market participant roles and terminology

Current arrangements contain potentially overlapping participant concepts and terminology. Greater clarity and simplification would improve market accessibility and consumer understanding.

5. Broader asset ecosystem integration

Future development should support alignment with wider asset registration and visibility initiatives to avoid multiple competing asset registers and reduce barriers to market participation.

These developments would support consumer trust, market efficiency and long-term interoperability.

Q5: Are there any constraints that would prevent us from progressing the Implementation Approach?

Please explain each constraint and provide supporting evidence where available.

RECCo does not currently identify any constraints that should prevent implementation of the proposed approach.

However, we consider there is a risk that insufficient consideration of future consumer-permission and governance requirements could result in additional implementation activity in later phases.

To mitigate this risk, we recommend that future CCS integration, consumer-permission frameworks and cross-domain governance requirements are incorporated into FMAR roadmap planning now, even where delivery occurs in subsequent phases.

This approach would reduce the likelihood of future redesign and provide greater certainty for industry participants.

Q6: As we are proposing phased onboarding for participants, based on your readiness, which Cohort do you think you will be ready for?

Please provide supporting evidence for your chosen Cohort and a rationale if Cohort 1 is not considered feasible.

Not applicable to RECCo.

RECCo will continue to support industry design activities and future interoperability discussions as part of its REC and prospective Consumer Data Domain responsibilities.

Q7: What additional risks, assumptions, issues or dependencies can you identify that would help in the delivery of the implementation plan or the wider end-to-end plan?

Please explain each and suggest ways to address the identified constraints.

The principal risks identified by RECCo are:

Consumer trust and engagement

Reliance solely on FSP statements that they have contractual authority, without clear governance, transparency and consumer control mechanisms, could undermine consumer trust and reduce participation in flexibility services.

Future rework and duplication

If FMAR is developed without appropriate consideration of future CCS integration requirements, industry participants may incur avoidable implementation and migration costs.

Market complexity

The flexibility landscape continues to involve multiple participant types, regulatory frameworks and asset initiatives. Excessive complexity may hinder innovation, market entry and consumer understanding.

Cross-domain dependencies

FMAR relies on data and governance arrangements that span multiple domains. Failure to manage those dependencies effectively may introduce data-quality and accountability risks.

We recommend ongoing cross-domain governance and roadmap coordination to address these issues.

Policy dependencies

Several enduring design choices depend on policy decisions not yet taken. These include the definition of the relevant consumer for an asset, the outcome of Ofgem's consultation on a central asset register, and alignment of FSP definitions across rules and licences. We recommend that these are tracked as explicit dependencies in the end-to-end plan and played back through the Digitalisation Delivery Group (DDG).

Q8: What opportunities do you see that could accelerate the implementation plan and wider end-to-end plan?

Please provide supporting evidence where available.

The most significant opportunity to accelerate future implementation is early agreement on target-state governance and interoperability principles.

Specifically:

- establishing a shared roadmap between FMAR and CCS;
- agreeing authoritative data sources and ownership models;
- defining future permission and asset ownership approaches; and
- aligning onboarding, security and assurance frameworks across programmes where appropriate.

Taking these decisions early would reduce future redesign effort and provide clearer implementation signals to industry participants.

Q9: Apart from the answers given above in this section, do you agree that the proposed Implementation Approach will enable your timely integration with FMAR? (Agree / Broadly agree with some refinements required / Don't agree)

If you don't agree, please set out the reasons for your response.

Response: Broadly agree with some refinements required.

The proposed implementation approach appears capable of supporting timely FMAR implementation.

However, RECCo considers that timely delivery should be accompanied by early definition of future consumer-permission, governance and interoperability requirements. Without this, there is a risk that implementation timescales are achieved at the expense of future efficiency and consumer confidence.

We therefore support the current delivery approach while encouraging earlier visibility of the longer-term roadmap.

Q10: Do you agree with the proposed division of responsibilities (please refer to Appendix - Section 5.2) between SOs and the FMAR service?

RECCo broadly agrees with the proposed division of responsibilities.

However, we encourage continued review of accountability arrangements to ensure there is clear ownership of participant governance. Given the role of FSPs in the flexibility arrangements, having robust regulatory controls to enable FSPs to be held accountable for their actions will be critical to promoting consumer trust.

Given the complexity of the emerging flexibility ecosystem, responsibilities should remain clear, transparent and understandable for both participants and consumers.

Q11: Do you agree with the proposed Migration Approach and believe you will be capable of conducting it? (Agree / Broadly agree with some refinements required / Don't agree)

If you don't agree, please set out the reasons for your response.

Not applicable to RECCo.

Q12: To what extent does the proposed FMAR accreditation approach provide an appropriate framework for organisations connecting to and operating within FMAR? (Appropriate / Broadly appropriate, with some refinements required / Not appropriate)

Please provide reasons for your response and any suggested improvements.

Response: Broadly appropriate, with some refinements required.

The proposed accreditation approach appears sensible for initial FMAR implementation; however we understand more detailed proposals are expected through a further governance consultation.

As the detailed approach evolves, RECCo believes further consideration should be given to alignment with the CCS onboarding, identity, security and assurance framework. Consistent approaches across services would reduce industry burden and support future interoperability.

Q13: To what extent does the proposed approach to FMRs provide an appropriate framework for organisations to implement, connect to and operate within FMAR? (Appropriate / Broadly appropriate, with some refinements required / Not appropriate)

In particular, do you consider it appropriate and proportionate for transitional FMR provisions to require DNOs and NESO to complete the applicable implementation, data cleansing, migration, testing, readiness assurance and cutover activities within the relevant implementation timescales?

Please provide reasons for your response, and identify any proposed FMR obligation that you consider should not be made binding because it is impractical, disproportionate or incapable of implementation.

Response: Broadly appropriate, with some refinements required.

RECCo supports the principle of establishing a clear and enforceable framework for FMAR implementation and operation.

However, we encourage continued consideration of:

- participant accountability;
- governance of consumer-facing interactions;
- alignment with emerging regulatory and Smart Data frameworks;
- simplification of terminology and participant roles where possible; and
- avoiding duplication with wider industry governance arrangements.

The framework should support implementation whilst maintaining clarity for participants and consumers.

Q14: Do you feel that the proposed support arrangements set out in this section and in Appendix - Section 8 will provide you with sufficient support to fulfil your role effectively? (Yes / Partly / No, unable to assess based on the information provided)

If you selected 'partly' or 'no', please identify the main area in which you would require additional support.

Not applicable to RECCo.

Q15: Please provide any additional feedback on the information set out in this consultation, including any matters not specifically addressed by the questions above.

RECCo's key overarching observation is that future integration with consumer-focused governance and permission frameworks should be treated as a strategic design consideration now rather than solely as a future enhancement.

While we recognise the need to deliver FMAR pragmatically and at pace, we believe that consumer trust, transparency and control will be critical enablers of long-term flexibility market growth. The roadmap for addressing these areas should therefore be defined and communicated alongside current implementation activity.

We also encourage continued consideration of how FMAR relates to wider asset-registration and asset-visibility initiatives to avoid duplication, complexity and fragmented consumer experiences.

Finally, we welcome ongoing engagement with Elexon and look forward to continuing collaboration on these topics as FMAR develops.