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Annex B – Policy Overview and TI Phase 1b Design

Contents

Consultation Questions 1
Introduction 2
TI Arrangements Phase 1 4
TI Phase 1b Design 7
CCS Arrangements 18
TI Arrangements Phase 2 19

Consultation Questions

Question B1: Are the proposed TI Phase 1b arrangements for providing account specific tariff information and TI Event Notifications complete and workable? If not, please identify any gaps or issues, their potential impact and your proposed resolution

Question B2: Have you identified any gaps, dependencies or material new evidence relating to the interaction between CCS and TI Phase 1b that could affect successful implementation or operation? If so, please explain the impact on TI Phase 1b and any proposed mitigation. Where the underlying issue concerns the common CCS arrangements, please indicate whether it was raised through the separate CCS consultation.

Question B3: For Suppliers: For multi-rate tariffs where the applicable time-of-use periods vary according to meter configuration under a single Tariff ID:

a) Approximately how many customers or metering points are affected? Where possible, indicate whether this relates to traditional or smart meters and whether volumes are expected to change.

b) If a separate Tariff ID were required for each distinct set of time-of-use periods, approximately how many additional Tariff IDs would you need to create and maintain? Estimates are acceptable.

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c) Do you agree with the proposed use of standardised wording in the Tariff Comments field to indicate when meter-specific information is required? If not, please explain your preferred approach and the reasons for it.

Question B4: For TI Users / RTI Users: Do you agree with the proposed approach for managing multi-rate tariffs, differentiated by meter configuration? If not please provide details of your preferred approach, with supporting evidence

Introduction

1. The Clean Flexibility Roadmap[1] set out government's vision for a clean, flexible, consumer-focused electricity system. This roadmap reinforced how the country needs an electricity system that is more flexible as we meet the needs of homes and businesses whilst harnessing the intermittent nature of renewable energy. The roadmap is instrumental in providing a plan for our commitment to meeting our clean power ambitions, as we aim to scale consumer-led flexibility (CLF) from 2.5GW in 2023 to 10GW to 12GW by 2030.

2. Consumer participation is fundamental to unlocking greater flexibility across Britain, leading to benefits for households, businesses and the environment. Increasing consumer-led flexibility will allow consumers to reap the benefits of lower energy bills whilst also ensuring enhanced control over their bills. CLF is therefore key to fulfilling our commitment to reduce energy bills.

3. The Smart Secure Electricity Systems (SSES) Programme is crucial for establishing robust technical and security frameworks for Energy Smart Appliances (ESAs) and load control organisations to support the drive towards flexibility. Tariff Interoperability (TI) Arrangements are one crucial aspect of the

[1] Clean flexibility roadmap - GOV.UK

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SSES programme which will allow ESAs to easily respond to tariff pricing information.

4. Government consulted on SSES proposals in 2024 and, in April 2025[2], confirmed our intention to introduce the first phase of TI by making changes to the Electricity Supply Standard Licence Condition (SLCs) and to the Retail Energy Code (REC).

5. The TI Arrangements will require certain Electricity Suppliers to publish tariff pricing information via a standardised Application Programming Interface (API) in a consistent format. This will make it easier for ESAs and optimisers to access Tariff Pricing Data[3] to optimise consumers' energy consumption. This will encourage growth of optimisation services and give consumers opportunities to save on their energy bills while at the same time supporting our energy security and decarbonisation goals. Greater flexibility is key to driving the transition to homegrown clean power and reducing Britain's aggregate electricity use at peak demand periods, thereby minimising the amount of generation and associated network that needs to be built to meet peak demand.

6. TI policy proposals were developed through engagement with the Tariff Interoperability Working Group (TIWG) and the Tariff Interoperability Solution Working Group (TISWG) with participation from Suppliers, optimisers, including ESA manufacturers and operators, and trading bodies. TIWG continues to provide a forum for industry engagement on TI, including the planned Phase 2 discussions towards the end of 2026.

[2] Delivering a smart and secure electricity system: implementation - government response

[3] Previously referred to as Energy Pricing Data – Tariff Pricing Data covers both Tariff Information which is publicly available and account-specific, along with pricing information contained within supply contracts between Suppliers and Consumers.

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7. In November 2025, DESNZ, in partnership with RECCo, consulted on proposals to deliver TI Arrangements Phase 1. We received responses from 25 organisations. Following our consideration of consultation responses, the May 2026 Government Response confirmed the phased implementation approach for Tariff Interoperability. TI Phase 1a implementation is now underway, with Suppliers building against the baselined API Technical Specification ahead of the 18 February 2027 implementation date.

8. The May 2026 Government Response also confirmed the policy decision to implement TI Phase 1b and to integrate Tariff Interoperability with the Consumer Consent Service (CCS). This consultation does not revisit those decisions. Instead, it seeks stakeholder views on the detailed technical, operational and governance arrangements required to successfully implement TI Phase 1b in November 2027.

9. The remainder of this annex explains the policy intent behind the proposed TI Phase 1b design and highlights the key changes introduced through integration with CCS.

TI Arrangements Phase 1

10. The SSES Programme determined that Tariff Interoperability should be phased. The scope of Phase 1 is a Minimal Viable Product (MVP) covering the following four use cases:

    - Use Case 1: Support a third-party organisation in optimising energy consumption when a customer of the organisation knows their current Supplier and tariff name (or can easily find them) and provides this information to the organisation.

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- Use Case 2: Support a third-party organisation in optimising energy consumption if a customer does not know their tariff name (and cannot easily find it) but knows their Supplier's name and is the account holder.
- Use Case 3: Support a third-party organisation in optimising energy consumption of a customer when the Supplier modifies components of the tariff (e.g. changes the price as part of consumer choosing a new tariff).
- Use Case 4: Support a third-party organisation in optimising energy consumption of a customer, without requiring the customer of the organisation to manually inform the organisation if they change their tariff or Supplier.

11. Following the November 2025 consultation on changes to the Electricity Supplier Licence and REC, the May 2026 Government Response set out that the MVP should be further phased as follows.

- *TI Phase 1a – Public Tariff Data*: Provision of public tariff data to third party optimisers and any other organisation or person that wants to access this data ('TI Users'). This delivers Use Case 1 and elements of Use Case 3 where the consumer notifies the TI User that their tariff has changed.
- *TI Phase 1b – Private Tariff Data*: Provision of energy supply account specific tariff information to Registered Tariff Interoperability Users (RTI Users), where the account holder has provided their permission. This data includes the account holder's current tariff and notification of a change to the account holder's tariff arrangements, for example, where the tariff has changed or the account holder has switched Supplier. TI Phase 1b delivers Use Cases 2, 3 and 4.
- Together, TI Phase 1a and TI Phase 1b establish the Minimum Viable Product for Tariff Interoperability. TI Phase 1a delivers access to public tariff information, while TI Phase 1b extends the arrangements to provide secure

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access to account specific tariff information where the account holder has granted permission through CCS.

12. The May 2026 Government Response set out the decision to use the CCS to manage the account holder's permission for TI Phase 1b. This decision was taken in the context of Ofgem's direction to use CCS for managing account holder's permission, the costs of changing from an Energy Supplier managed permission model (as originally proposed in the November 2025 consultation) to the CCS and risk of future migration of active permissions from a Supplier managed solution to the CCS.

13. The May 2026 Government Response introduced a new Electricity Supply Standard Licence Conditions (SLC11C). This requires Electricity Suppliers to provide tariff information (including export tariffs but excluding bespoke charges, block tariffs, unmetered supply charges and those tariffs that are not compatible with the REC API tariff schema) for:

    - Domestic Premises, and
    - Relevant TI Non-Domestic Premises.[4]

14. Electricity Supply SLC11C provides an ability for Ofgem to issue a derogation to an Electricity Supplier against these requirements. In addition, Electricity Suppliers to Relevant TI Non-Domestic Premises only are not required to provide tariff information if they supply fewer than 100,000 Relevant TI Non-Domestic Premises or if the only information that they would be required to provide relates to Deemed Contacts or Out-of-contract Contracts.[5]

[4] These are non-domestic premises where the quality of electricity supply is determined by a Current Transformer Electricity Meter.
[5] As defined in the Electricity Supply Standard Licence Conditions.

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15. The May 2026 Government Response introduced REC Schedule 35: Tariff Interoperability Arrangements. REC Schedule 35 sets out the obligations and business process for TI Energy Suppliers to provide tariff data via a standardised API for TI Phase 1a. This schedule also provides a mechanism for Suppliers (including Gas Suppliers) that are not mandated by Electricity Supply SLC11C to opt into the TI arrangements and be bound by the REC requirements. Mandated electricity Suppliers, together with those that have opted in, are collectively referred to as 'TI Energy Suppliers'.

16. Following a further consultation in August and September 2026[6], the Government Response published on 29 October 202678confirmed the final TI Phase 1a technical requirements. The associated REC modifications take effect from 06 November 2026, establishing the technical baseline for implementation ahead of the 18 February 2027 go-live.
17. This consultation on TI Phase 1b complements, but is separate to, RECCo's consultation on the REC drafting required to implement the CCS. The CCS consultation sets out the framework for its implementation and operation to support consumer permission to share energy data. The TI Phase 1b consultation builds on the CCS framework and sets out the specific changes required to support CCS integration.

TI Phase 1b Design

18. The TI Phase 1b solution will be implemented through:

    - a further amendment to REC Schedule 35, extending the scope of the TI arrangements to include access to account specific tariff information,

[6] TI Phase 1a Technical Specification consultation
[7] Smart Secure Electricity Systems (SSES) tariff interoperability: code modifications for Phase 1a - GOV.UK

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- changes to the definitions within REC Schedule 1, with new definitions added and some existing definitions amended,
- a new TI API Technical Specification setting out the detailed technical arrangements that enable TI Users and RTI Users to interact with TI Energy Suppliers to facilitate the TI arrangements,
- changes to the Energy Market Data Specification (EMDS), to introduce new API market messages, new data items and updates to some existing data items, and
- An update to the TI Developer Portal to add TI Phase 1b technical guidance and machine-readable specifications.[9]

19. TI Phase 1b does not require any changes to Electricity Supply SLC11C, as governance of the TI Arrangements has now been incorporated into the REC.

20. In November 2025, DESNZ and RECCo jointly consulted on the proposed TI Arrangements, including a draft REC TI Arrangements Schedule. This consultation was based on a solution that enabled access to public and consumer specific tariff information.. Consequently, certain elements captured within this TI Phase 1b consultation were included within the original solution design. In response to the feedback received to the original consultation and further engagement with the industry, for example through TIWG, additional elements have been developed that integrate TI with CCS and therefore represent enhancements beyond the original November 2025 proposals.

[9] In TI Phase 1a, the portal is known as the TI API Specification and the naming of the TI related REC artefacts is being updated for TI Phase 1b.

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Terminology

21. Since the November 2025 consultation, we have updated the terminology used to describe consumer specific tariff information. As the CCS project has progressed, with a particular focus on access to half-hourly metered data, it has become apparent that the term 'consumer' may be ambiguous, as it could be interpreted as referring to the occupant of a premises and / or to the holder of the energy supply account.

22. To reinforce the position that access to tariff information (other than public tariff information) under the TI Arrangements is based on the permission of the energy supply account holder, new terminology is proposed as part of the TI Phase 1b solution. Specifically, the terms 'account holder' and 'account specific tariff information' will be introduced and defined to provide greater clarity regarding the scope of the arrangements and the basis on which access is granted.

RTI User Registration

23. As set out in the November 2025 consultation, organisations seeking access to account specific tariff information will be required to undergo a registration process. The integration with CCS now informs the scope of this registration process, with RTI Users required to become CCS Users in accordance with the CCS qualification process.

24. The proposed CCS qualification process is set out in the CCS arrangements drafting consultation[10] which was published ahead of this TI Phase 1b consultation. The CCS qualification process is based on the existing REC Service User qualification arrangements, which include an Information Security and Data Protection (ISDP) assessment, external testing and the execution of an

[10] Consumer Consent Solution consultation

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access agreement. The proposed TI approach to each of these qualification activities has been set out below:

- *Access Agreement* – the original TI solution proposed the introduction of a bespoke user agreement created to bind Non-Party RTI Users to the relevant REC provisions. This position has been reconsidered in light of the CCS integration, recognising that the provisions contained within the proposed RTI user agreement were largely aligned to those included within the standard REC Access Agreement used for other REC Services. We have therefore concluded that, rather than introducing a bespoke agreement, RTI Users should be required to sign the standard REC Access Agreement set out in Appendix 1 of REC Schedule 9: Qualification and Maintenance.[11] The necessary amendments to REC Schedule 9, including the addition of, and references to, RTI Users within the REC Access Agreement, are being considered through the CCS arrangements drafting consultation.

- *ISDP assessment* – the REC ISDP assessment is designed to provide assurance that organisations accessing REC Services and industry data have appropriate information security and data protection controls in place, commensurate with the sensitivity of the data being accessed. Under the original TI policy framework, a light touch registration process was proposed. Consistent with that approach, we continue to believe that requiring RTI Users to complete the full REC ISDP assessment would be disproportionate to their role within the TI Phase 1b arrangements. The assurance approach should therefore provide appropriate protection while avoiding unnecessary duplication of requirements. To provide an appropriate minimum level of cybersecurity assurance, and to align with wider government cybersecurity policy, we propose that RTI Users should, as a minimum, hold Cyber Essentials Plus certification.

[11] REC Schedule 9: Qualification and Maintenance here

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- *External Testing* – we believe that all CCS Users, including RTI Users and TI Energy Suppliers, should be required to complete testing to demonstrate they can meet their requirements under the REC, prior to integrating with the CCS. This will provide assurance that participants can effectively manage permission through the CCS and will help mitigate the risk of adverse consumer outcomes. As set out in Annex C, we are also consulting on proposals for TI Energy Suppliers and RTI Users to undertake a minimum set of test cases to ensure that they can manage the required interactions to facilitate access to tariff information.

Access to Account Specific Tariff Information

25. The November 2025 proposals enabled an RTI User to obtain the Tariff Identifier applicable to an account holder and use it to retrieve the relevant public tariff pricing data, delivering Use Case 2. To support ongoing optimisation under Use Cases 3 and 4, the proposed arrangements also enable an RTI User to receive TI Event Notifications from the relevant TI Energy Supplier. The five event types are:

- change to the Tariff Identifier;
- a change to the unit rate, standing charge or time related variables associated with the relevant Tariff Identifier;
- termination of the TI Energy Supplier's registration, including where the account holder has switched to an alternative energy Supplier;
- change of account holder, where the Supplier becomes aware that the account holder is no longer associated with the specific metering points; and
- where the TI Energy Supplier is providing data on a voluntary basis, notification of its intention to cease provision of tariff information in relation to the relevant metering points.

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26. These provisions have been reinstated within the proposed REC Schedule 35 drafting in Annex D, with only limited changes. The principal amendment arising from the integration with CCS, is that account holders will not be able to revoke permission directly with the TI Energy Supplier. Under the TI Phase 1b solution, permission will be managed through CCS, with revocation undertaken either via the CCS consumer portal or directly through engagement with the relevant RTI User. We recognise that TI Energy Suppliers may nevertheless receive requests from an account holder seeking to revoke permission. In such circumstances, TI Energy Suppliers should explain that revocation must be completed through the relevant RTI User or via the CCS.

27. The other main change to event notifications, from the November 2025 proposals, is the addition of a requirement for TI Energy Suppliers to notify RTI Users where the account holder is no longer responsible for a specific MPxN e.g. in the case of a change of occupancy. This event notification allows the RTI User to engage with the consumer to determine whether a change to their agreed service is required.

Meter-dependant time-of-use arrangement under a single Tariff Id

28. For some electricity multi-rate tariffs, RECCo understands that some Suppliers may have established a single Tariff Id to cover different time-of-use arrangements depending on the meter configuration applicable to the individual meter. In these instances, the Tariff Id alone may be insufficient to establish the time periods applicable to a tariff at an individual metering point.

29. For TI Phase 1a we have recognised this issue and provided guidance that Suppliers should use the 'Tariff Comments' field (Data Item DI80021) in the MM80005: Get Tariff Details Response market message to highlight to TI Users

where the timing applicable to each rate is determined based on the meter configuration, and specifically the Standard Settlement Configuration (SSC) and Time Pattern Regime (TPR). The TI User would then be aware that they will need to understand the meter point specific SSC and TPR, use public data e.g. the meter configuration table published by RECCo - Meter Configuration Tables and consider how to apply the tariff to the relevant time periods.

30. The TI User would need to obtain information on the specific meter configuration (SSC and TPR), either from the consumer or directly from the relevant Supplier. The SSC and TPR may be available via the Supply Number provided on the consumer's energy bill and statement, although sharing this data is no longer mandated on change of Supplier for non-traditional meters. Even with the SSC and TPR there may be challenges for TI Users is determining how to apply a tariff to a customer's specific meter.

31. For TI Phase 1b, we have the opportunity to amend the TI API to include additional information to help determine how to apply a tariff to a meter dependent time of use tariff to an individual meter configuration. RECCo has considered several approaches to address this issue, including:

    - Enhanced TI Phase 1a approach: Retaining the existing API structure while introducing a requirement for TI Energy Suppliers to populate the 'Tariff Comments' field in the MM80005 Get Tariff Details Response market message where the applicable time-of-use periods depend on the meter configuration. Amending the approach from guidance (TI Phase 1a) to mandating the provision of information by TI Energy Suppliers (TI Phase 1b) would provide a consistent indication that additional meter-specific information is required, without introducing new data items or substantially changing the existing API structure.

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- Separate Tariff Ids: Requiring a separate Tariff Id for each distinct set of time-of-use periods. This could enable the applicable time periods to be identified through the published tariff data but may significantly increase the number of Tariff Ids that TI Energy Suppliers need to create and maintain. This may benefit RTI Users who would receive the specific Tariff Id for an account holder via the MM8XXXX9: Get MPxN Tariff Details Response under TI Phase 1b. However, for TI Users accessing the public tariff API, a greater number of Tariff Ids associated with the same tariff name could make it more difficult to identify the tariff applicable to an individual consumer.

- Meter configuration information: Including SSC and TPR information within the metering-point-specific MM8XXXX9: Get MPxN Tariff Details Response market message to RTI Users under TI Phase 1b. This could assist RTI Users in identifying applicable time periods, although they would still need to interpret the configuration using the relevant reference information and may need to seek additional information to understand how a TI Energy Supplier has mapped the tariff to the specific time periods for an account holder's meter. This approach would require changes to the TI API design and Supplier systems.

- Meter-specific pricing information: Returning the rates and applicable time periods for the individual metering point to RTI Users through the MM8XXXX9: Get MPxN Tariff Details Response market message under TI Phase 1b. This would provide a more complete response for RTI Users, reducing the need to separately interpret meter configuration information, but would require further changes to the TI API design and to Supplier systems to provide information at this level of granularity.

32. RECCo's proposes, as a minimum, to apply the 'Enhanced TI Phase 1a approach' noted above to retain the existing API structure and require TI Energy Suppliers to use the 'Tariff Comments' field to indicate where the applicable time periods are dependent on the meter configuration and additional meter-

specific information is required. To ensure consistency and avoid confusion, RECCo would, under this approach, introduce a data item rule against the 'Tariff Comments' data item in the MM80005 Get Tariff Details Response market message stating that Suppliers should: "*Populate with 'check the meter specific SSC and TPR for applicable time pattern' where Tariff Pricing Data is dependent on the meter configuration*".

33. The 'Enhanced TI Phase 1a approach' minimises changes to the existing TI API structure and the additional implementation and maintenance effort associated with alternative solutions. However, feedback received to date on the potential options has been limited, and further evidence is required to establish the number of metering points and consumers affected, the volume of additional Tariff Ids that could arise from alternative approaches, and whether the proposed approach would meet the needs of TI Users and RTI Users.

34. RECCo is therefore seeking views on whether the proposed approach is workable and proportionate, or whether an alternative solution should be considered for TI Phase 1b.

Account Holder Permission Management

35. The main change between the version of REC Schedule 35 consulted on in November 2025 and the version included in this consultation is the introduction of the CCS as the mechanism for managing permission to access account specific tariff information.

36. From the perspective of an RTI User, this introduces a requirement to become a CCS User, with RTI Users becoming a sub-category of 'Authorised Third Party' under the CCS arrangements. As set out above, this affects the registration process that RTI User applicants must complete.

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37. We have also updated the account holder permission process. This requires an end-to-end process for obtaining and maintaining authorisation whereby an RTI User submits an initial authorisation request through CCS and, once permission has been granted, uses the resulting access token to request account specific tariff information from the relevant TI Energy Supplier.

38. RTI User requirements relating to the CCS are set out in the REC CCS Arrangements Schedule, which has been subject to a separate consultation ahead of this TI Phase 1b consultation. These requirements include security standards applicable to messages exchanged through CCS, and also the bilateral exchange of data between RTI Users and TI Energy Suppliers. This TI Phase 1b consultation builds on those arrangements and focuses on the additional TI-specific requirements and interactions needed to enable the exchange of account specific tariff information between RTI Users and TI Energy Suppliers.

39. From the perspective of a TI Energy Supplier, there are three main security changes introduced through the integration with CCS:

- TI Energy Suppliers will be required to develop, implement and maintain a process for verifying that an individual referred through CCS is the relevant account holder;
- Before disclosing account specific tariff information, TI Energy Suppliers will be required to confirm that permission remains in place based on the receipt of a CCS provided access token from the relevant RTI User; and
- Where a RTI User is registered with a TI Energy Supplier, to receive TI event notifications, the TI Energy Supplier will be required to implement a mechanism for monitoring CCS permission revocation notifications issued by the CCS. The TI Energy Supplier will confirm that there have been no

permission revocation notifications before informing a RTI User that there is a TI event notification to be requested. This mechanism utilises the Shared Signals Framework which is further explained within Annex G.

40. Use of the CCS will require TI Energy Suppliers to become CCS Users, with TI Energy Suppliers becoming a sub-category of 'Energy Data Holder' under the CCS arrangements. Unlike RTI Users, TI Energy Suppliers will not be required to enter into an Access Agreement, as they are already subject to the CCS arrangements by virtue of their status as REC Parties. However, TI Energy Suppliers will be required to complete CCS testing to demonstrate that their systems and processes can securely and reliably process requests for account holder data and respond in accordance with the CCS requirements. Further information of the testing approach, including requirements on TI Energy Suppliers to test their TI API messages that will be exchanged with RTI Users, can be found in Annex C.

41. To reflect the new requirements arising from integration with CCS, REC Schedule 35 has been updated to include a revised end-to-end process for managing requests for account specific tariff information, together with appropriate cross references to the REC CCS Arrangements Schedule and other proposed new CCS related REC artefacts. These amendments are intended to ensure clear alignment between the TI Arrangements and the CCS framework, particularly in relation to the management of permissions and the exchange of data.

42. Consultation respondents are encouraged to review the CCS drafting that is being consulted on in parallel and use that consultation as the primary mechanism for providing feedback on the core CCS requirements and associated processes.

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CCS Arrangements

43. As noted above, TI Phase 1b uses the proposed new CCS arrangements. These were published by RECCo for consultation on 07 September 2026.

44. To help parties understand the relevant sections of the CCS proposals that support TI Phase 1b, we have provided a navigation guide below:

- Paragraph 7.2 of the CCS consultation itself includes a summary of the interactions between CCS and TI.
- Section 3 of the CCS Arrangements Schedule includes the process for organisations to become CCS Users, including the provision of security certificates and the establishment of CCS SSF streams.
- Section 7 of the CCS Arrangements Schedule defines requirements applicable to all CCS Users, with sections 8 and 9 covering ATP and EDH specific requirements respectively.
- Section 13 of the CCS Arrangements Schedule sets of the requirements associated with account holder verification, applicable to all TI Energy Suppliers.
- Section 14 of the CCS Arrangements Schedule defines the operational processes that Supplier consumer permission management including renewal, query and revocation; and also includes the operational processes to support account holder verification;
- The CCS API Technical Specification which provides a plain English description of the CCS technical solution, including interactions with the CCS Directory and each of the CCS endpoints, plus further details regarding validation and authentication of CCS messages.

- The CCS Service Definition which defines the service being delivered by the CCS Provider.
- The CCS elements of the EMDS which define the messages and data items required for permission management activities and account holder verification.

TI Arrangements Phase 2

45. The above section focuses on delivery of TI Phase 1 and the associated Use Cases 1 to 4.

46. DESNZ and RECCo will engage with industry (through the Tariff Interoperability Working Group) towards the end of 2026 to set out plans to progress TI Phase 2.

47. TI Phase 2 is intended to consider the following additional use cases developed through the SSES Programme. Its detailed scope, supplier obligations and implementation arrangements will be subject to the relevant policy decisions, industry engagement and change processes:

    - Use Case 5: Support a third-party organisation in optimising energy consumption if a customer of the organisation does not know their current Supplier and tariff name (and cannot easily find them) but has previously provided permission to share this information. They may or may not be the account holder.
    - Use Case 6: Support a third-party organisation in optimising energy consumption of a customer for Complex Tariffs (e.g. Block).