Department for Energy Security & Net Zero

Annex C – Implementation Plan and Testing Approach

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Consultation Questions

Question C1: Have you identified any concerns with the implementation plan that would prevent successful TI Phase 1b go-live in November 2027? Where a concern is identified, responses should explain the affected section or milestone, the practical impact and the proposed resolution.

Question C2: Do the proposed testing principles provide an appropriate basis for developing the detailed TI Phase 1b Test Approach and Plan and for providing sufficient confidence in successful implementation? If not, what additional or amended principles should be considered?

Purpose and scope of this annex

1. This annex sets out the proposed implementation plan for TI Phase 1b and the principles that will be used to develop the detailed TI Phase 1b Test Approach and Plan. It seeks views on whether the proposed sequence, readiness activities

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and testing framework are sufficient to support successful implementation in November 2027.

2. This annex also covers implementation of the proposed MM80005: Get Tariff Details Response market message change for meter-dependent multi-rate tariffs described in Annex B. Subject to the consultation outcome, we propose that this change takes effect with TI Phase 1b in November 2027. Testing would cover the condition requiring the Tariff Comments field, the prescribed wording, unaffected tariffs and compatibility with existing public tariff API's. The detailed plan will confirm the applicable participant responsibilities and evidence requirements

3. The proposed approach has been informed by substantial industry engagement undertaken during TI Phase 1a, including pilot testing, bilateral discussions with energy Suppliers, software providers and prospective TI Users, and input through the TIWG and IWG. Feedback from these activities has shaped the proposed implementation and testing principles, particularly in relation to participant readiness, test environments and tooling, evidence requirements, reliance arrangements, cross-party interoperability and the need for clear implementation support.

4. TI Phase 1b depends on the Consumer Consent Solution (CCS). The separate CCS consultation sets out the proposed CCS arrangements, user roles, qualification and common data-sharing arrangements. As the CCS consultation is now closed, respondents should focus their comments on the TI Phase 1b-specific arrangements and any associated CCS dependencies.

5. The detailed plan will identify the CCS design baseline, interface freeze, test-environment availability, test credentials and endpoints, qualification window and production onboarding milestones on which TI depends. Each dependency

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will have an accountable owner and an impact assessment if its date or scope changes. Testing may begin with approved tools, but readiness for live operation must include evidence that the integrated TI and CCS journey works as required.

6. For implementation and testing purposes, this annex covers the additional TI Phase 1b activities required once the relevant CCS capability is available. It addresses TI-specific build, interfaces, participant readiness, cross-party testing and the handling of CCS dependencies. It does not duplicate the design, qualification or assurance of the CCS service itself.

Proposed Implementation Plan

7. Following consideration of responses to this consultation, DESNZ intends to publish its decision on the TI Phase 1b REC changes after Ofgem has made its decision on the REC Change Proposal to incorporate the CCS arrangements into the Retail Energy Code. The TI Phase 1b decision is currently expected in April 2027.

8. Following the close of the consultation in December 2026, RECCo and DESNZ will consider consultation responses and continue to develop the detailed arrangements for TI Phase 1b in parallel with the progression of the CCS arrangements. During this period, work will continue on the detailed technical, implementation and testing arrangements, including interfaces, testing scenarios, participant readiness, onboarding requirements and relevant CCS dependencies.
9. Where elements of the TI Phase 1b arrangements can be confirmed ahead of the Government Response, further implementation detail and supporting technical artefacts will be developed and shared with industry to support early planning and development activity. These will remain subject to the outcome of the consultation and any relevant CCS decisions. The final arrangements will then

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be confirmed through the Government Response and associated REC changes, currently expected in April 2027.

10. Subject to consideration of consultation responses, DESNZ proposes to use its powers under the Energy Act 2023 to implement the required changes to REC Schedule 35, REC Schedule 1 and the associated technical artefacts required for TI Phase 1b in April 2027. The legal drafting will distinguish between transitional obligations that apply during implementation and the operational obligations that apply from TI Phase 1b go-live.

11. TI Phase 1b is proposed to go live in November 2027. From that date, a RTI User that has completed the applicable CCS and TI readiness requirements will be able to obtain the tariff identifier applicable to an account holder and receive the relevant TI event notifications, where the account holder has provided an appropriate permission through CCS.

12. The proposed timetable is intended to provide TI Energy Suppliers and RTI Users with sufficient time to complete system development, CCS qualification and onboarding, TI testing, operational readiness and deployment. The final timetable is currently being progressed and reviewed (will be published in due course), but as a principle will remain aligned with the confirmed CCS implementation and qualification timetable.

13. DESNZ proposes a single mandatory implementation date for TI Energy Suppliers. This is intended to provide a consistent service for RTI Users and account holders and to avoid the complexity of some TI Energy Suppliers operating only TI Phase 1a while others are already operating the TI Phase 1b journey. RTI Users will be able to begin operating from TI Phase 1b go-live once they have completed the applicable qualification, testing and readiness requirements.

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14. The implementation plan will define the timings, milestones and activity required for completion ready for go live November 2027. The implementation activities will be undertaken by RECCo, TI Energy Suppliers and RTI Users, who will collectively deliver, test, assure and operationalise the Phase 1b capability.

Indicative timing	**Milestone**	**Purpose / participant activity**
Q4 2026 – April 2027	Stage 1 – Mobilisation and engagement	TI Energy Suppliers and prospective RTI Users appoint a sponsor and readiness lead, nominate operational contacts, review the TI Phase 1b and CCS consultation proposals, and engage through TIWG, IWG, webinars and bilateral sessions to understand the changes and dependencies.
April 2027 – following Government Response	Stage 2 – Impact assessment and planning	Participants assess the impact of the confirmed TI Phase 1b design and REC changes on systems, processes, data and third-party providers, secure resources and budget, and baseline an internal implementation plan aligned to the CCS qualification and TI testing timetable.
May/June 2027	Stage 3 – Design and build	TI Energy Suppliers and RTI Users complete TI Phase 1b solution design and build against the final REC technical artefacts, including TI market messages, event notifications, CCS permission

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Indicative timing	Milestone	Purpose / participant activity
		use/validation controls, the proposed MM80005 Tariff Comments rule, and updated business processes.
July – September 2027	Stage 4 – Testing	Participants complete mandatory TI Phase 1b scenarios (successful and negative paths, including invalid permission, expiry and revocation, and MM80005 conditional-field and existing-client compatibility tests), take part in any coordinated cross-party end-to-end or pilot testing, resolve defects and retain the required evidence.
End of October 2027	Stage 5 – Operational readiness	TI Energy Suppliers provide TI Phase 1b information, including all required endpoints, for the CCS Directory; RTI Users confirm operational contacts. Participants establish support and incident arrangements, train operational teams and prepare deployment.
October 2027	Stage 5 – Final readiness confirmation	Remaining readiness and remediation activities are completed and Director-level attestation of readiness is received before deployment.
November 2027	Stage 6 – Cutover and TI Phase 1b go-live	Participants deploy and complete final go-live checks. Operational Phase 1b obligations begin and qualified, ready RTI Users can use the TI journey. All TI Energy

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Indicative timing	Milestone	Purpose / participant activity
		Suppliers are expected to be ready to participate by this date.
Post go-live and duration	Stage 7 – Enhanced support / hypercare and transition to BAU	RECCo provides enhanced support, including dedicated surgeries and rapid escalation of early issues. Monitoring arrangements are operationalised and participants transition to business-as-usual operation, with post-go-live performance assurance developed through the REC change process.

Participant implementation and readiness activities

15. The detailed implementation plan will define the dates and dependencies for the following activities. The sequence will be coordinated with the CCS timetable and will avoid duplicating requirements where appropriate:

- completion of TI Phase 1b solution design and build;
- completion of the applicable CCS qualification and onboarding activities;
- registration and validation of TI Phase 1b-specific endpoints and operational contacts required from TI Energy Suppliers and operational contacts required from RTI Users, including confirmation of where existing TI Phase 1a information for TI Energy Suppliers can be reused;
- completion of mandatory TI Phase 1b test scenarios and submission or retention of the required evidence;
- Access and availability of appropriate Test tools and Test Environments.
- Director level attestation of readiness; and
- deployment and final go-live checks.

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16. The final plan will specify the deadline by which TI Energy Suppliers, who will all be subject to Phase 1b obligations, must complete testing and readiness activities.

Engagement, support and governance during implementation

17. RECCo will maintain structured engagement throughout implementation. The Tariff Interoperability Working Group (TIWG) will continue to advise on the TI design and delivery; The Tariff Interoperability Implementation Working Group (IWG) will develop and track TI testing and operational readiness; and webinars, guidance, FAQs and bilateral engagement will be used to support participants. The detailed plan will also set out the approach for securing sufficient participation across TI Energy Suppliers and prospective RTI Users to provide meaningful cross-party coverage.

18. RECCo, Ofgem and DESNZ will coordinate between the CCS and Tariff Interoperabilty workstreams so that dependencies, participant communications and evidence requirements are aligned where practical, while preserving the separate scope and ownership of each arrangement.

19. Following go-live, RECCo proposes to provide a defined period of enhanced support, including dedicated surgeries and a route for rapid escalation of implementation issues. The duration and operating model will be confirmed as part of operational readiness planning, with input from TIWG and IWG.

20. This consultation does not change the implementation plan for TI Phase 1a. Parties should continue their TI Phase 1a implementation and testing activities in accordance with the published TI Phase 1a Testing Approach and Plan.

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21. Post-go-live performance assurance will be developed separately through the REC change process. It will be proportionate and risk based and will not replace the implementation testing and readiness activities described in this annex. Post TI Phase 1b go-live (November 2027), it is expected that monitoring arrangements (similar to TI Phase 1a) will be operationalised to enable ongoing assurance from Day 1 – further details are to be defined.

Purpose and scope of the testing approach

22. The purpose of the TI Phase 1b testing approach is to provide confidence that TI Energy Suppliers and RTI Users can securely, reliably and consistently operate the TI Phase 1b journey before it is used in live operation.

23. TI Phase 1b introduces account specific processing, reliance on a CCS permission, new TI market messages and event notifications across organisational boundaries. The principal TI risks are that a participant uses an account holder's permission incorrectly, returns or relies on incorrect tariff information, fails to process a relevant event notification, or cannot interoperate with another participant.

24. For RTI Users and TI Energy Suppliers participating in the TI Phase 1b arrangements, there is a dependency to have achieved CCS qualification and be a registered CCS User. The CCS arrangements will define the qualification and testing required to become a CCS User. This consultation does not seek views on the design of those core CCS requirements.

Development of the detailed TI Phase 1b Test Approach and Plan

25. RECCo will develop the detailed TI Phase 1b Test Approach and Plan following consideration of consultation responses and continued engagement with TI Energy Suppliers, prospective RTI Users, DESNZ and RECCo's CCS team. The

approach and plan will be developed, taking into consideration any feedback received via the TIWG and IWG forums, before being baselined and published.

26. The detailed plan will define the mandatory scenarios, participant responsibilities, participation and coverage model, test environments and tooling, evidence requirements, governance, issue management, operational readiness activities, management confirmation and implementation timetable.

27. Completion of the applicable mandatory TI Phase 1b test scenarios will be a readiness requirement for every participant before they operate within the TI Phase 1b arrangements.

28. The plan will build on relevant TI Phase 1a experience but will be more participant-intensive because TI Phase 1b requires cross-party journeys and a dependency on CCS. Individual participants will be required to complete self-directed testing similar to Phase 1a, but we will also explore opportunities to co-ordinate cross-party E2E testing – genuine process of sending and receiving public tariff pricing data between RTI Users and TI Energy Suppliers without the use of stubs or emulators

Proposed testing principles

End-to-end TI Phase 1b journeys

29. We propose that testing should validate complete TI Phase 1b journeys rather than individual interfaces in isolation. The core journey should begin from the point at which an appropriate CCS permission exists and should demonstrate that an RTI User can request the relevant tariff information, the TI Energy Supplier can correctly use or validate the permission, the correct Tariff Identifier can be returned and the associated public tariff pricing data and lifecycle TI

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event notifications can be used as intended. The detailed plan will define the minimum journeys and participant combinations required.

Correct use of CCS permissions within TI

30. TI testing should demonstrate that RTI Users only initiate or continue the TI Phase 1b journey where the required CCS permission is in place and that TI Energy Suppliers correctly use or validate the permission information made available through CCS before providing account-specific tariff information. Testing should cover the response to valid permission, invalid or failed authorisation, expiry and revocation, including controls that prevent TI Phase 1b information being provided where the required permission is not in place. This is not intended to repeat testing of the CCS permission-creation process or the CCS service's own security controls.

Cross-party interoperability

31. Testing may combine participant-level conformance testing with cross-party interoperability testing. Each participant operating from go-live should complete the applicable mandatory scenarios, using approved test tools, stubs or emulators where these provide sufficient evidence of conformance. In addition, the detailed Test Approach and Plan may require a coordinated set of live cross-party tests between TI Energy Suppliers and RTI Users sufficient to demonstrate interoperability across representative implementations. The coverage model should provide confidence in the market-wide journey without requiring every participant to test bilaterally with every other participant. We will consider running a Pilot test phase to validate the overall design and also the feasibility of cross-party E2E testing.

Common mandatory scenarios and negative paths

32. We propose a common minimum set of mandatory TI Phase 1b scenarios for participants operating from go-live. The scenarios should cover the successful journey and relevant error, rejection and lifecycle conditions. Additional

participant specific scenarios may be required, defined and executed dependent on the participant's implementation or risk profile.

Evidence and implementation assurance

33. We propose that participants should retain evidence that the mandatory scenarios have been completed and that identified defects have been resolved or appropriately managed. The detailed plan will define the minimum evidence, the use of any test workbook, the role of management confirmation, and the circumstances in which RECCo may request additional evidence. Valid CCS evidence should be reused where it demonstrates the same control or outcome and where reuse is permitted by the CCS arrangements.

Operational readiness

34. We propose that readiness for TI Phase 1b should cover more than technical test execution. Participants should also have completed the applicable CCS qualification (including testing) and onboarding, registered the required endpoints and contacts, established support and incident arrangements, prepared deployment and trained relevant operational teams and confirmed that guidance and business processes are in place. The detailed plan will define how these activities are evidenced and confirmed.

Proportionate and risk-based application

35. We propose a common minimum testing and readiness baseline, with additional evidence or assurance targeted where the risk justifies it. Risk factors may include the protection of account specific tariff information, the complexity or novelty of an implementation, the participant's role in the end-to-end journey and issues identified during testing. The approach should avoid unnecessary duplication while maintaining confidence in consumer outcomes and interoperability.

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Coordination with CCS qualification

36. We propose that CCS qualification and TI implementation should be coordinated from a participant's perspective. Timetables, guidance, onboarding information, and evidence requests should be aligned where practical. This coordination does not merge the two consultations or governance routes: core CCS requirements remain owned by the CCS arrangements, while the TI Phase 1b Test Approach and Plan will govern the additional TI-specific journey.

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