Department for Energy Security & Net Zero

Department for Energy
Security & Net Zero
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Dear REC Party, Tariff Interoperability Working Group member, Tariff Interoperability Implementation Working Group member and other interested party,

Consultation on Tariff Interoperability Phase 1b arrangements

The Department for Energy Security and Net Zero (DESNZ), in collaboration with the Retail Energy Code Company (RECCo), is consulting on the regulatory, design, technical and implementation arrangements required to deliver Tariff Interoperability (TI) Phase 1b[1].

Tariff Interoperability is intended to make it easier for consumers to participate in consumer-led flexibility and to benefit from services that can optimise electricity use against tariff prices.

TI Phase 1b will enable an authorised Registered Tariff Interoperability (RTI) User[2] to identify the tariff applying to an energy account where the account holder has granted permission through the Consumer Consent Service (CCS)[3]. This consultation seeks views from TI Energy Suppliers, TI Users, prospective RTI Users and other interested parties on the proposed arrangements, including their completeness, workability and implementation impacts for November 2027.

[1] Updates to REC Schedule 35: Tariff Interoperability Arrangements, REC Schedule 1: Interpretations and Definitions, the TI Developers Portal, EMDS and a new API Technical Specification.
[2] RTI Users must sign an agreement to comply with the REC, including how they process and use data. They must also qualify as a CCS User.
[3] Consumer Consent Hub - REC Portal

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TI Phase 1b builds on Phase 1a, which requires TI Energy Suppliers to provide access to public tariff data via a standardised API.

TI Phase 1a makes tariff pricing data available, but an optimiser still needs to know which tariff applies to the consumer. TI Phase 1b allows an authorised RTI User, with the account holder's permission, to identify the applicable tariff and receive notifications of relevant changes, helping optimisation services use current tariff prices when managing the consumer's electricity use.

What TI Phase 1b will do

Under TI Phase 1b, the relevant energy supply account holder must provide permission to share its energy supply account specific tariff information.

Using the CCS arrangements, a TI Energy Supplier will support account holder verification by confirming that the person referred by CCS holds the relevant energy supply account and providing the relevant meter point number (MPxN[4]) to support the ongoing request. The CCS arrangements define the account holder verification process, as described in the CCS consultation issued on 7 September 2026[5].

Following an account holder providing a valid permission through the CCS against each specific MPxN, an RTI User can request account specific tariff information from the relevant TI Energy Supplier[6]. The request from the RTI User includes an access token, provided by the CCS, enabling the TI Energy Supplier to verify that account holder permission is in place. In response to the RTI User's request, a TI Energy Supplier provides the Tariff Identifier(s) for the associated MPxNs. The RTI User will use the Tariff Identifier to request associated tariff pricing data from a TI Energy Supplier using the TI Phase 1a public API.

[4] Each gas and electricity supply/metering point has a unique reference number. For electricity this is the Meter Point Administration Number (MPAN) and for gas it is the Meter Point Reference Number (MPRN). Collectively these are referred to as Meter Point X Numbers (MPxNs).
[5] Consumer Consent Solution consultation now open - The Retail Energy Code Company
[6] The Electricity Suppliers that must provide tariff data are described in Electricity Supply SLC11C. Other Electricity Suppliers as well as Gas Suppliers can opt-in to the tariff arrangements. Collectively, they are known as 'TI Energy Suppliers'.

If account holder permission also includes ongoing provision of TI event notifications, the TI Energy Supplier records this requirement and sends a notification to the RTI User when relevant account or tariff information changes. An RTI User will obtain a new access token from the CCS to validate that account holder permission is still in place and send a request to the TI Energy Supplier to provide the specific details of the TI event notification. Further information on the mechanism for issuing TI event notifications is set out in Annex E and G.

These arrangements allow an optimiser or Energy Smart Appliance service to recognise the consumer's current tariff, understand if that information is changing and respond to tariff price signals.

The consultation also seeks views on multi-rate tariffs where the applicable time periods depend on meter configuration. For example, an Economy 7 tariff may have different off-peak charging periods depending on the customer's meter configuration, despite using the same Tariff ID. Annex B proposes standard wording in the Tariff Comments field of the public 'Get Tariff Details Response' - MM80005, to indicate that meter-specific information is needed as well as potential alternative approaches. The implementation implications are addressed in Annex C.

How we reached this point

Following consideration of responses to the November 2025 consultation on proposals to implement Tariff Interoperability, the May 2026 Government Response[7] set out decisions to:

- Introduce a new Electricity Supply Standard Licence Condition (SLC) 11C to require Electricity Suppliers to implement tariff interoperability arrangements in accordance with the REC.[8]

[7] Tariff Interoperability Arrangements Published - The Retail Energy Code Company This is a response to the November 2025 consultation

[8] Electricity Supply Licence SLC11C- Making available information related to Charges for the Supply of Electricity and Export Tariffs implemented 18 May 2026 Tariff Interoperability Arrangements Published - The Retail Energy Code Company

- Require TI Energy Suppliers to make public tariff data available using a standardised API schema from 18 February 2027, referred to as 'TI Phase 1a'[9].
- Consult on further changes to the REC to require TI Energy Supplier to provide account specific tariff information[10] (an account holder's current tariff and notification when that tariff information changes), referred to as 'TI Phase 1b'.

The May 2026 Government Response determined that TI Phase 1b should use CCS to enable an account holder to grant permission for specified data to be shared by TI Energy Suppliers with RTI Users.

Relationship to the CCS consultation

CCS is a new Ofgem initiative, with RECCo as the appointed delivery partner. It will provide a single mechanism for consumers to provide permission to access their energy data, beyond just their tariff. It provides a single platform with common onboarding arrangements for users and providers of energy data.

Adopting this mechanism for TI Phase 1b (rather than the original November 2025 proposal for Suppliers to individually manage permission) avoids duplication of costs to build a temporary alternative permission mechanism and migrating to CCS in the future. It also avoids data risks from migrating permissions from Suppliers to the CCS if this change happened at a later date.

The CCS arrangements were published for consultation on 07 September 2026 and the consultation closed on 19 October 2026. The CCS proposals will now be progressed through REC Issue I0318[11] with the expectation that the CCS arrangements will be implemented into the REC in March 2027.

TI Phase 1b depends on the CCS capabilities required for account holder verification, permission management and authorisation being available in time for participant build

[9] Government implemented REC Schedule 35: Tariff Interoperability Arrangements on 18 May 2026 here and based the required TI Phase 1a technical specifications, which were subsequently approved by government on 30 October 2026 following further consultation.
[10] Previously referred to a consumer specific tariff information.
[11] Introduction of Consumer Consent Solution - REC Portal

and end to end testing. Delivery risks include changes to the CCS interfaces or requirements during TI Energy Supplier and RTI User development, and insufficient time to complete integration testing before November 2027. The proposed implementation and testing approach is set out in Annex C; respondents are invited to identify any further dependencies or risks that could affect TI Phase 1b delivery.

What we are consulting on

Scope of this consultation focuses on the detailed TI Phase 1b arrangements and their interaction with CCS. It also covers the proposed treatment of meter-dependent multi-rate tariffs in the public tariff API route, a new REC Category 2 TI API Technical Specification and the consolidation of TI Phase 1a and TI Phase 1b developer content in a REC Category 3 TI Developer Portal. Common CCS requirements and interactions have been consulted on separately through the CCS consultation and are not in scope for this consultation.

We seek views on whether:

- the proposed end-to-end TI Phase 1b design is complete and workable;
- the proposed REC obligations, definitions and governance arrangements are sufficient;
- the API technical specification, market messages, data items and associated standards and TI Developer Portal capture the required technical arrangements;
- the implementation plan is achievable; and
- the proposed high-level testing principles provide an appropriate basis for development of the detailed TI Phase 1b Test Approach and Plan.

How to navigate the consultation pack

The proposed changes build on the TI Phase 1a REC arrangements and technical provisions, together with the account-specific tariff proposals consulted on in November 2025. The principal TI Phase 1b additions are access to account specific tariff information, TI event notifications and integration with CCS for account holder

verification, permission management and authorisation. Each annex explains the relevant proposals.

This consultation on the TI Phase 1b REC changes provides a list of questions (**Annex A**) and is structured into six areas, seeking views on:

- **TI Phase 1b design (Annex B):** This annex explains the proposed design for access to account specific tariff information and the associated TI Event Notifications, including the use of CCS Permission. It also seeks views on the treatment of multi-rate tariffs whose time periods depend on meter configuration. All respondents should read it to understand the proposals. It supports this consultation and will not form part of the enduring REC provisions.
- **Implementation Plan and Testing Approach (Annex C):** The proposed testing principles that will inform the development of a detailed Test Approach and Plan and the key implementation activities and dates that must be achieved to successfully implement TI Phase 1b in November 2027. Reviewers with responsibility for implementation and testing should read this annex.
- **REC Schedule 35: Tariff Interoperability Arrangements (Annex D):** This annex sets out the proposed drafting for incorporation into version 2 of REC Schedule 35, including new obligations on TI Energy Suppliers and RTI Users relating to the implementation and operation of TI Phase 1b. The annex also includes new and amended definitions for inclusion in REC Schedule 1: Interpretations and Definitions. Reviewers with responsibility for the implementation and operation of TI Phase 1b should read this annex.
- **TI Application Programming Interface (API) Technical Specification (Annex E):** This annex sets out the detailed technical arrangements that enable TI Users and RTI Users to interact with TI Energy Suppliers to facilitate the TI arrangements. As a REC Category 2 document, it will be subject to formal REC change control, including consideration of the impacts of proposed changes on affected parties This artefact brings together TI Phase 1b requirements with existing requirements from TI Phase 1a. It is intended primarily for parties who

have responsibility for the implementation and operation of TI Phase 1a and 1b. Reviewers with this skill set should review on this annex.

- **Energy Market Data Specification (EMDS) (Annex F)**: This annex describes the new and amended data items to be added to the data item catalogue and the new and amended market messages to be added to the market message catalogue. The EMDS provides a central cross-code register that governs the data items and market messages used in the energy market. Reviewers with an interest in data governance should read this annex, and
- **TI Developer Portal (Annex G):** This annex sets out the proposed physical definition of TI interactions for inclusion in the TI Developer Portal. This is a REC Category 3 artefact and builds on the portal that has been implemented for TI Phase 1a.[12] This artefact is intended primarily for technical experts, such as developers and software architects, who are responsible for building and maintaining the TI API. Reviewers with this skill set should focus their review on this annex.

TI Phase 1a was introduced through a new Electricity Supply Licence Standard Licence Condition (SLC 11C). The implementation of TI Phase 1b does not require any further amendments to this Standard Licence Condition, as it references the REC as the mechanism through which the detailed provisions are defined.

Next Steps

This is a statutory consultation under section 246 of the Energy Act 2023. Following consideration of responses, the Secretary of State will decide whether to make the proposed REC changes, with or without modification. DESNZ, with support from RECCo, intend to publish a Government Response and the final legal and technical documents in April 2027. Subject to the consultation outcome, the REC changes are

[12] We are taking this opportunity to rename the portal that was implemented for TI Phase 1a as the TI Developer Portal. Currently this is called the TI API Technical Specification. This allows us to have a single, governance focused new TI API Technical Specification for TI Phase 1a and 1b (see Annex E) and a TI Developer Portal for TI Phase 1a and 1b with the consolidated technical guidance and machine-readable content for developers (Annex G).

expected to be implemented in April 2027, allowing time for industry build, testing, assurance and readiness ahead of the planned November 2027 go-live.

TI Phase 1a implementation and testing should continue against the requirements and specifications set out in the REC and the 18 February 2027 timetable. No proposals in this consultation change the effective TI Phase 1a baseline for 18 February 2027.

How to respond

Respondents should review the annexes and consider the consultation questions. Views, on consultation questions, with associated reasons, should be submitted on the proforma document, to:

tariffinteroperability@retailenergycode.co.uk by 18 December 2026.

For each issue, please identify the relevant annex and section and explain the issue, its severity, supporting evidence, implementation impact and proposed resolution, For an issue involving CCS, explain its effect on TI Phase 1b and state whether you have raised the underlying point separately through the CCS consultation.

Confidentiality and data protection

Information you provide in response to this consultation, including personal information, may be disclosed in accordance with UK legislation (the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please indicate this on the proforma, but be aware that we cannot guarantee confidentiality in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not be regarded by us as a confidentiality request.

As DESNZ are leading this consultation in collaboration with RECCo, please note that all responses will be shared between the two organisations. We will process your

personal data in accordance with all applicable data protection laws. See the DESNZ privacy policy.

A formal response document, confirming the final agreed position, will be developed by DESNZ and RECCo. This will be published alongside the changes to REC Schedule 35: Tariff Interoperability Arrangements, REC Schedule 1: Interpretations and Definitions, TI API Technical Specification, data items and market messages held in the EMDS and the TI Developer Portal that will be implemented into the REC.

Quality assurance

This consultation has been carried out in accordance with the government's consultation principles.

If you have any complaints about the way this consultation has been conducted, please email: bru@energysecurity.gov.uk.

Yours faithfully,



Funmi Brady

Programme Director, Smart Secure Electricity Systems (SSES) Programme

(An official of the Department for Energy Security & Net Zero authorised to act on behalf of the Secretary of State).

Department for
Energy Security
& Net Zero

Annexes:

Annex A – Consultation Questions (*appended to this document*)
Annex B – Policy and TI Phase 1b design,
Annex C - Implementation Plan and Testing Approach
Annex D – REC Schedule 35: Tariff Interoperability Arrangements
Annex E – TI API Technical Specification
Annex F – Energy Market Data Specification
Annex G – TI Developer Portal

ANNEX A: Consultation Questions

Below is a list of questions which we request responses to. These questions are associated to annexes within this consultation.

Annex B: Policy and TI Phase 1b design	**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. 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.
Annex C: Implementation Plan and Testing Approach	**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?

Annex D – REC Schedule 35: Tariff Interoperability Arrangements	**Question D1**: Do you agree that the proposed amendments to REC Schedule 35: Tariff Interoperability Arrangements and REC Schedule 1: Interpretations and Definitions, as set out in Annex D, are clear and workable for TI Phase 1b. If not, please identify the relevant clause or definition, explain your concerns and their potential impact, and propose alternative drafting. **Question D2:** Have you identified any additional amendments to REC Schedule 35 or REC Schedule 1 that are necessary to implement TI Phase 1b? If so, please identify the relevant clause or definition (where applicable), explain why the amendment is required, its potential impact and your proposed drafting.
Annex E – TI API Technical Specification	**Question E1:** Do you agree with introducing a new REC Category 2 TI API Technical Specification covering the proposed Phase 1b requirements and specified existing Phase 1a interoperability requirements? Please explain your answer. **Question E2**: Are the proposed requirements in the TI API Technical Specification clear, complete and workable? If not, please identify the relevant section, explain the issue and its impact, and propose a correction. **Question E3**: Have you identified any additional changes to the API Technical Specification necessary to support TI Phase 1b? If so, please identify the relevant section,

	explain why the change is required, its potential impact and your proposed resolution. **Question E4:** Do you agree with moving the specified existing TI Phase 1a interoperability requirements into the new Category 2 TI API Technical Specification? Please identify any requirements that should be included or excluded and explain any implementation, governance or compliance impacts.
Annex F – Energy Market Data Specification	**Question F1**: Do you agree with the proposed changes to the EMDS to support TI Phase 1b? If not, please identify the relevant section, explain why the change is required, its potential impact and your proposed solution. **Queston F2**: Have you identified any additional changes required to the EMDS for TI Phase 1b? Where you propose additional changes, for each additional change, identify relevant section, impact and proposed resolution.
Annex G – TI Developer Portal	**Question G1:** Do you agree with the TI Phase 1b content within the TI Developer Portal? If not, please identify the relevant section, explain why a change is required, its potential impact and your proposed solution. **Question G2:** Have you identified any additional changes to the TI content within the TI Developer Portal necessary to support TI Phase 1b? If so, please identify the relevant section, explain why a change is required, its potential impact and your proposed resolution.

	Question G3: Do you agree with consolidating TI Phase 1a and Phase 1b developer guidance and machine-readable specifications in the TI Developer Portal? Please explain your answer, including any concerns about access, version control, migration or maintaining compatibility with the effective Phase 1a baseline.