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Retail Energy Code Performance Assurance Board Paper

R0323 - Tariff Interoperability Phase 1a - Supplier Performance Assurance Requirements

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For decision	Section 1 provides an overview of the problem statement associated with REC Change Proposal R0323. Section 2 outlines the proposed solution developed under this Change Proposal. Section 3 presents the Code Manager's high-level assessment of the benefits, costs, and stakeholder engagement activities undertaken throughout the progression of R0323. The Code Manager recommends that the REC Performance Assurance Board (PAB): • **Approves the proposed change solution;** • **Approves the proposed implementation approach; and** • **Approves the proposed implementation date of 18 February 2027.**
Appendices	RECPAB_26_1027_04_A_R0323 Change Report (Final Recommendation) RECPAB_26_1027_04_B R0323 Legal Drafting – Final RECPAB_26_1027_04_C R0323 Consolidated Confidential Responses – CONFIDENTIAL RECPAB_26_1027_04_D R0323 Consolidated Non-Confidential Responses

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1 Problem statement

The Department for Energy Security and Net Zero (DESNZ), in partnership with RECCo, developed and consulted on Tariff Interoperability proposals. DESNZ has published a Government Response to the consultation and its decision to implement new Tariff Interoperability Arrangements through a new Electricity Supply Standard Licence Condition (SLC) 11C, changes to REC Schedule 1: Definitions and Interpretations, and new Schedule 35: Tariff Interoperability (TI) Arrangements. These changes were implemented on 18 May 2026 and set a TI Phase 1a go-live date of 18 February 2027.

The Government Response also baselined a new TI Application Programming Interface (API) Technical Specification and changes to the Energy Market Data Specification (EMDS). Following testing to further assure the detailed design, these will be subject to further consultation and implemented into the REC later in 2026.

The Government Response has split the delivery of Phase 1 into two phases. Phase 1a, which will go live in February 2027, provides TI Users with access to publicly available tariff information from TI Energy Suppliers. Phase 1b, which will go live in November 2027, provides Registered Tariff Interoperability (RTI) Users with access to Customer Specific Tariff Information from TI Energy Suppliers. Phase 1b will use the Consumer Consent Solution (CCS), currently being developed by RECCo, to facilitate the required Consumer Consent for RTI Users to access Customer Specific Tariff Information.

R0323 will provide the Code Manager with data to assure TI Energy Supplier performance against obligations in a new REC Schedule: Tariff Interoperability Arrangements.

If TI Energy Suppliers do not meet their Tariff Interoperability obligations, this could lead to Consumers' energy supply not being optimised, meaning that Consumers may incur higher charges. If price signals are not responded to through optimisation, this may also have other impacts such as reduced Net Zero benefits and reduced response to capacity constraints.

2 Proposed Solution

The proposed solution introduces a new Performance Assurance reporting framework to support monitoring of compliance with the TI Arrangements. This consists of a new monthly report, 'Tariff Interoperability Energy Supplier Performance Assurance' (2100), alongside two ad-hoc reports: 'Tariff Interoperability Energy Supplier API Error Code Report' (2110) and 'Tariffs not in Scope of Tariff Interoperability Arrangements' (2120). Together, these reports will provide the Code Manager with visibility of TI Energy Supplier performance, API issues, and tariff types that are not currently supported by the TI Arrangements, enabling effective monitoring and informing future development of the framework.

Alongside TI Energy Supplier reporting, RECCo is developing a TI Monitoring Tool which will independently monitor API availability, response times and adherence to the TI API Technical Specification through regular polling of TI Energy Supplier APIs. Together, the TI Energy Supplier reporting mechanisms, annual self-certification, and independent monitoring tool are intended to provide a proportionate and robust assurance framework that supports effective oversight of TI Energy Supplier compliance and informs future development of the TI Arrangements.

2.1 TI Energy Supplier Performance Report (Monthly)

TI Energy Suppliers will be required to report against the new REC obligations on:

- TI API availability (99.9%);

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- TI API response times of 95% less than 1 second against steady state (1,000 requests/second) and 95% less than 5 seconds between steady state and peak capacity (up to 5,000 requests/second for 5 minutes);
- making all tariff updates available at least 60 minutes before they take effect;
- removing TI User access (e.g. on grounds of excessive use or security); and
- volumetrics on use of the service.

The submission of this report is to be done through the REC Portal by the TI Energy Suppliers.

2.2 API Error Codes Report (on request)

TI Energy Suppliers will provide up to 3 months data on the number and type of API Error Codes. API Error Codes identify messages that have not been successfully received by TI Energy Suppliers or by TI Users. Data will be provided following a Code Manager request, for example to support a deep dive on the effectiveness of the TI Arrangements. TI Energy Suppliers will have at least one month to provide data following a request.

The submission of this report is to be done through the REC Portal by the Electricity Suppliers on an ad-hoc basis.

2.3 Tariff Structure Report (on request)

All Electricity Suppliers (not just TI Energy Suppliers) will provide information on the structure of any of their tariffs that cannot be sent to TI Users using the schema set out in the TI API Technical Specifications. This will provide valuable information on any required changes for TI Phase 2, which will extend the reach of the TI Arrangements to complex electricity tariffs as well as to the gas market. This information will also inform any future reviews of the TI arrangements.

The submission of this report is to be done through the REC Portal by the TI Energy Suppliers on an ad-hoc basis.

2.4 Maintenance of Qualification Annual Statement

TI Energy Suppliers will be required to confirm that they have made all tariffs within scope of the TI Arrangements available to TI Users and have in place arrangements to manage queries from TI Users and Consumers. This information will be collected as part of the Maintenance of Qualification Annual Statement and will be documented in the REC Maintenance of Qualification Guidance (note that this guidance is not subject to REC change management but has been included within scope of R0323 to obtain industry views and for transparency).

2.5 TI Monitoring Tool

In addition to direct reporting from Energy Suppliers on their TI performance, RECCo is developing a TI Monitoring Tool. This will enable RECCo to understand in real time if a TI Energy Supplier's API is available, the response time for calls, and to confirm that the API messages sent are consistent with the TI API Technical Specification. The TI Monitoring Tool will poll each TI Energy Supplier's Market Participant Identifier (MPID) every few minutes (randomised so that checks are not predictable). While this will provide a good level of assurance that the TI Arrangements are being operated to the required standards, it is not a substitute for the assurance that can be obtained from TI Energy Supplier self-reporting. For transparency, TI Monitoring Tool Performance Assurance reporting has been added to the PARC.

TI Users can be any organisation or person that wishes to access tariff data from a TI Energy Supplier. This data within scope of TI Phase 1a is publicly available and does not contain personal data. Given the data involved and the intent for this to be an open data access model, under which TI Users are not 'authorised', R0323 does not propose to assure TI User performance. To mitigate risk, TI Energy Suppliers will be able to restrict access to a TI User where defined capacity limits are breached (1,000 requests per second from an individual IP address), or on grounds of security.

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3 Business Case Assessment

3.1 REC Party Impact Assessment

Respondents generally supported the proposed solution and agreed with the benefits identified. While some concerns were raised regarding the application of reporting requirements to non-TI Energy Suppliers, the Code Manager clarified that these requirements align with licence obligations applicable to all Electricity Supply Licence holders. Respondents welcomed the move from daily API reporting to a monthly reporting approach, considering it a more proportionate and pragmatic assurance model that reduces operational burden. Some respondents highlighted potential implementation and operational challenges, including the interaction with ongoing MHHS activities, resource constraints, the complexity of managing both MHHS and non-MHHS Metering Points, and the effort required to gather, store, and extract data for ad hoc reporting. However, the proposed minimum one-month response period for ad hoc reporting requests was generally viewed as reasonable. Respondents also sought further clarity on reporting expectations for non-TI Suppliers and the definition of a tariff where bespoke contracts are prevalent, with the Code Manager confirming that additional guidance would be considered where needed. No quantified costs were provided, although respondents identified potential effort relating to system changes, API monitoring, reporting processes, data retention, and data extraction activities.

3.2 Service Provider Impact Assessment

Implementation of R0323 will require changes across the Digital Service Portal, Data Analytics, and Performance Assurance functions. The Digital Service Portal will need enhancements to support the submission, validation, and reporting of new Party reports (2100, 2110 and 2120), including SFTP ingestion, file upload functionality, dashboard development, and associated testing. Similarly, Data Analytics changes will be required to collect, process, and display new data sets within Performance Assurance dashboards, with new data ingestion pipelines, dashboards, and reporting mechanisms needed. Both areas estimate an implementation lead time of approximately three months, including mobilisation following approval.

From a Performance Assurance perspective, the proposed monthly reporting regime and ability to request additional API error-code data were considered sufficient to provide oversight of TI Energy Supplier performance, support trend analysis, and enable deeper investigations where required. New systems, dashboards, processes, and resources will be needed to validate reporting, monitor performance, manage exceptions, and administer any resulting Performance Assurance Techniques (PATs). While implementation costs are expected to be minimal, ongoing effort will be required to review performance data, analyse trends, investigate issues, and manage ad hoc reporting requests. No costs were identified for Maintenance and Qualifications, with a minimum implementation period of two weeks required for associated changes.

3.3 Consultation

A consultation was circulated on 14 August 2026 to obtain views on the proposed solution. In total four Energy Supplier responses were received.

Consultation respondents were broadly supportive of R0323, including the proposed Performance Assurance framework, implementation date of 18 February 2027, and the use of Self-Governance approval through the Performance Assurance Board. Respondents generally agreed that the introduction of monthly reporting, ad hoc reporting and independent monitoring would provide appropriate oversight of TI Energy Supplier compliance with Tariff Interoperability requirements. However, several Parties highlighted the need for greater clarity on the interaction between TI Energy Supplier reporting and RECCo's proposed Tariff Interoperability Monitoring Tool, to avoid duplication and ensure reporting obligations remain proportionate.

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The main concerns raised related to the burden and practicality of the reporting requirements. Respondents requested clearer guidance on reporting ownership, templates, and the purpose and frequency of the proposed PARC 2120 report. One respondent highlighted the significant operational, technical and resource impacts associated with meeting the proposed performance requirements and questioned the assessment of TI Energy Supplier costs as "minimal", particularly given competing MHHS delivery pressures. Another respondent sought further clarification regarding reporting obligations for Non-TI Suppliers and their alignment with SLC 11C, arguing that this issue may warrant Authority consideration before implementation. Despite these concerns, most respondents supported progressing the Change Proposal, subject to additional guidance and clarification from RECCo.

Following the closure of the consultation, the Code Manager has amended the structure of the *2110 Tariff Interoperability Energy Supplier API Error Code Report* to remove the get_tariffs_response_[error code] and get_tariff_details_response_[error code] items. Following further review, it was identified that reporting against these metrics is not viable within the Phase 1a API architecture and cannot be consistently recorded by TI Energy Suppliers within the Phase 1a API design. This amendment ensures that the reporting requirements are technically achievable and proportionate.

3.4 Cost Benefit Analysis

Costs	Design / Development Costs	Implementation Costs	Ongoing Operational Costs
Energy Supplier	Minimal	Minimal	Minimal
Digital Service Portal	28 FTE days	10 FTE days	N/A
Data Analytics	5.4 FTE (27 days)	0.6 FTE (3 days)	1.4 FTE / annum (7 days/annum)
Performance Assurance	4.5 FTE	1 FTE	6 FTE / annum
Maintenance and Qualifications	£0	£0	£0

The expected benefits delivered by this Change Proposals are:

- Improved visibility of TI Energy Supplier performance;
- Enhanced Performance Assurance oversight; and
- Greater transparency across the market.

The Code Manager believes the cost and effort of implementing this Change Proposal are proportionate to the benefits provided by the proposed solution.

The implementation of this change will establish a robust and proportionate framework for monitoring compliance with the TI obligations. In doing so, it will provide the necessary Performance Assurance mechanisms to oversee TI Energy Supplier compliance, identify performance issues, and support ongoing operational monitoring. Furthermore, the implementation of R0323 is a key enabler for the successful delivery of TI Phase 1a, ensuring that appropriate assurance arrangements are in place from go-live to monitor and assess TI Energy Supplier performance in live operation.

The costs incurred primarily relate to the building and testing phases of the REC Portal mechanism to allow the proposed reports to be uploaded. Additional costs relate to the development and testing of proposed dashboards to

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allow for a transparent visualisation of the data provided, and for the data analysis needed to investigate trends and patterns.

In contrast, the benefits are significant. The change provides a strong mechanism to report TI Energy Supplier compliance with TI obligations. Long term, this will enable the phased implementation of further TI Arrangements (Phase 1b) to be completed efficiently, with no disruption. The benefits of this change are tightly linked to the benefits of the TI Programme of work to reduce barriers to interoperability between TI Energy Suppliers, devices and service providers. Overall, the benefits outweigh the costs, making this a cost-effective and strategically valuable change.

REC PAB Decision
The Code Manager recommends REC PAB to… • **Approves** the proposed change solution; • **Approves** the proposed implementation approach; and • **Approves** the proposed implementation date of 18 February 2027.

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