RETAIL ENERGY CODE

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CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0323 TARIFF INTEROPERABILITY PHASE 1A – SUPPLIER PERFORMANCE ASSURANCE REQUIREMENTS

On 05 June 2026 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0323 Tariff Interoperability Phase 1a – Supplier Performance Assurance Requirements.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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LEAD ANALYST	Flo Monea

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Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	We support the provision of data to the REC Code Manager to enable monitoring and assurance of Supplier performance against the obligations within the proposed Tariff Interoperability Arrangements. The ability to monitor compliance will provide greater transparency and help identify instances where obligations are not being met, supporting timely intervention and continuous improvement.	Thank you for your response.
SSE (Energy Supplier)	We would be grateful if further information could be shared on the reasoning why non-TI suppliers are required to provide information through PARC, as REC Schedule 35 appears to place emphasis on TI suppliers only.	Thank you for your response. This ad hoc report relates to all Electricity Suppliers as it links through to the licence obligations in new Electricity Supply SLC 11C. The PARC report mirrors the licence obligation on all Electricity Supply Licence holders, and the purpose is to understand what types of tariffs are not currently covered by the API specification. RECCo has agreed with DESNZ that it may collect this information on its behalf via the PARC and Schedule 35 paragraph 2.19 allows RECCo to share reporting information received with DESNZ and Ofgem. This is being retained as an option and DESNZ will

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		still have the rights to collect the information directly via the licence obligations in 11C.7.
E.ON Next (Energy Supplier)	We strongly welcome the decision to pivot away from a daily API performance data message toward a monthly reporting framework and the use of the Maintenance of Qualification Annual Statement. This represents a pragmatic, proportionate, and risk-based approach to assurance for Phase 1a. It avoids saddling suppliers with undue administrative and architectural burdens during a time of intense regulatory change. However, we note that the performance thresholds are strict: • 99.9% availability requires robust, highly available infrastructure. • 1,000 requests/second (steady state) and up to 5,000 requests/second (peak) require careful load-testing and potentially significant cloud egress/compute provisioning.	Thank you for your response. The performance thresholds are the KPIs that, following consultation, were determined to be appropriate and have been implemented into in the REC by DESNZ in May 2026.

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Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	Yes, we agree that the proposed solution addresses the problem statement.	Thank you for your response.
SSE (Energy Supplier)	We agree that the proposed solution addresses the problem statement but feel by placing obligations on non-TI suppliers the solution is going beyond the original scope to monitor performance of TI suppliers.	Thank you for your response. Please see comment to Q1 above.
E.ON Next (Energy Supplier)	Yes. The proposed solution strikes the right balance between market visibility and implementation feasibility. By combining supplier self-reporting (monthly), ad-hoc deep dives (Error Code and Tariff Structure reports), and independent TI Monitoring Tool, the REC PAF gains sufficient oversight to ensure the data ecosystem operates reliably without introducing prohibitive upfront compliance barriers.	Thank you for your response.

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Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	No alterative solution identified.	Thank you for your response.
SSE (Energy Supplier)	Not at this stage.	Thank you for your response.
E.ON Next (Energy Supplier)	The current hybrid approach (Monthly Reporting + RECCo Active Polling Monitoring Tool) is optimal for Phase 1a. An alternative worth considering for future phases (Phase 1b / Phase 2) would be a centralised API Gateway hosted by RECCo or a central body, rather than a distributed mesh of individual supplier endpoints. A central gateway would standardise authentication, rate limiting, and performance metrics collection natively, lifting the reporting and security enforcement burden entirely off individual suppliers.	Thank you for your response. The Code Manager notes this is a design question on the wider Tariff Interoperability and would suggest that Parties raise this at TI working group (TIWG) or in response to the forthcoming consultation on TI Phase 1b as required.

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Question 4:	Do you believe the solution appropriately accounts for the industry's move to the new MHHS arrangements whilst the industry manages both MHHS and non-MHHS Metering Points?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	We consider that further detail is needed to demonstrate how the proposed solution appropriately accounts for the industry's transition to the new MHHS arrangements, particularly during the period in which suppliers will be managing a mixed population of migrated and non-migrated MPANs. Under the current MHHS Programme timetable, suppliers are already operating within the migration window, with full migration due by 7 May 2027 (M15) and the new settlement timetable not taking effect until 2 July 2027 (M16). This means there will be a significant transitional period during which both legacy and MHHS arrangements must be managed in parallel. In that context, it is not yet clear how this proposal is specifically relevant to Phase 1a, particularly if the solution is intended to go live in February 2027, shortly before completion of the MHHS migration period.	Thank you for your response. We consider that these comments are more relevant to the implementation date for TI Phase 1a. This has been set by DESNZ as being 18 February 2027 when it implemented the new Schedule 35 Tariff Interoperability Arrangements into the REC in May 2026. Given that the TI Phase 1a implementation date is set, RECCo considers that it is important to ensure that the consequential change to the PARC is made so that performance can be assured from the go-live date.
SSE (Energy Supplier)	Until the API schema is available, we cannot confidently assess whether any differences will exist between migrated and non-migrated MHHS tariff details.	Thank you for your response. The API schema is available and was baselined in May 2026. This will be finalised in October 2026 following a consultation due to be published over the summer and implemented

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		into the REC as part of the November REC release. The baselined API Technical Specifications are here - APIs | Developer Portal.
E.ON Next (Energy Supplier)	Partially. While the TI API focuses heavily on tariff data structures rather than settlement mechanics, managing a dual stack of Market-wide Half-Hourly Settlement (MHHS) and non-MHHS metering points adds layers of operational complexity. Tariffs mapped to Advanced/Smart MHHS segments (e.g., complex time-of-use tariffs) will evolve rapidly during migration. The solution accounts for this by restricting Phase 1a/1b to simpler tariffs and requiring a Tariff Structure Report (on-request) to log complex structures. However, RECCo must ensure that the TI API Technical Specification schemas are explicitly mapped and aligned with MHHS data entities (like consumption windows and Data Services formats) to avoid duplicating IT translation layers.	Thank you for your response. The API Technical Specification for Phase 1a was baselined in May 2026. This will be finalised in October 2026 following a consultation due to be published over the summer and implemented into the REC as part of the November REC release. The API Technical Specification for Phase 1b will also be issued for consultation of the summer. RECCo welcomes comments on the detailed design and alignment with MMHS as part of these consultations. RECCo also expects to undertake future reviews of the API schema to ensure that it remains capable of providing the required information to TI Users as tariff structures and the market innovates and changes.

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Question 5:	Do you foresee any risks/issues with the design of the proposed 2100 report 'Tariff Interoperability Energy Supplier Performance Assurance'?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	At this stage, we have not completed a full impact assessment of the proposed 2100 report, 'Tariff Interoperability Energy Supplier Performance Assurance'. Therefore, we are not currently in a position to identify any specific risks or issues associated with the report design. However, we would recommend the inclusion of a field identifying the party with whom the data has been shared. This would provide greater transparency and support the investigation and resolution of exceptions reported through the error code report. In particular, it would help suppliers identify whether errors are associated with a specific party, enabling more targeted analysis and remediation, and ultimately reducing the risk of recurring issues. A comprehensive assessment of the proposed solution, including any operational, system, process, or reporting risks, will be undertaken as part of the Phase 1a build and implementation activities. Any risks, issues, or design considerations identified through that assessment will be reviewed and managed through the appropriate governance and change processes.	Thank you for your response. A field to capture the recipient Party cannot be included within the current solution. This is not part of the TI Phase 1a design and is not a data field in the API schema. A Supplier would only be aware of a request from a TI User and an individual IP Address level.
SSE (Energy Supplier)	While this is not applicable to SSE at this stage, gathering this information would be highly complex and time-intensive.	Thank you for your response.

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E.ON Next (Energy Supplier)	The main operational risks include: Data Alignment: Potential discrepancies between the supplier's self-reported monthly availability/response metrics and the data captured by RECCo's independent TI Monitoring Tool (which polls randomly every few minutes). Clear reconciliation guidelines are needed for cases where the Monitoring Tool flags a drop in availability that doesn't align with the supplier's internal logs. Volume Metrics: Capturing exact volumetrics on the use of the service might require complex logging filters if malicious actors or scrapers bombard the API, potentially skewing "genuine" usage metrics.	Thank you for your response. The Code Manager notes and welcomes these risks being raised for consideration: 1) Reconciliation between monitoring tool and monthly reporting 2) Data quality issues if API hit by malicious attacks/scrapers

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Question 6:	Do you foresee any risks/issues with the design of the proposed ad-hoc 2110 report 'Tariff Interoperability Energy Supplier API Error Code Report'?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	Please see response to Q5	Noted. Thank you for your response.
SSE (Energy Supplier)	While this is not applicable to SSE at this stage, gathering this information would be highly complex and time-intensive.	Noted. Thank you for your response.
E.ON Next (Energy Supplier)	The requirement to provide up to 3 months of data on the number and type of API Error Codes means suppliers must design and maintain data retention and indexing policies specifically for API HTTP logs (e.g., 4xx and 5xx errors). If not properly managed via a scalable log aggregator, searching and extracting 3 months of high-velocity API error logs could degrade database performance or incur high cloud storage extraction fees.	Noted. Thank you for your response.

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Question 7:	Do you foresee any risks/issues around the request and submission arrangements for this Tariff Interoperability Energy Supplier API Error Code Report'?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	Please see response to Q5	Noted. Thank you for your response.
SSE (Energy Supplier)	At present, this is not applicable to SSE. However, should we be mandated to participate at a future date, we would have introduce system and process changes to be able to collate the data for this report on an ad-hoc basis. We feel Error code information could be better sourced from the REC direct, thus not putting the burden on the supplier to provide this information.	Thank you for your response. Based on the design specifications where the API messages are sent directly between the TI User and the TI Energy Supplier, sourcing the data directly from the REC could not be possible.
E.ON Next (Energy Supplier)	No major issues. The provision of at least one month to provide the data following a Code Manager request is reasonable and gives suppliers sufficient time to run data extraction queries, perform internal QA, and format the report to REC standards without disrupting business-as-usual operations.	Noted. Thank you for your response.

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Question 8:	Do you foresee any risks/issues with the design of the proposed ad-hoc 2120 report 'Tariffs not in scope of Tariff Interoperability Arrangements'?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	Please see response to Q5	Noted. Thank you for your response.
SSE (Energy Supplier)	As ad-hoc report 2120 refers to all suppliers, not just TI suppliers – we would like to request more details on the scope of the information required. All of our customers have bespoke contracts or are on Deemed rates, so we would like to understand what benefit this information could add. This report is ad-hoc so we would appreciate an idea of how often this information would be requsted.	Thank you for your response. It is expected that this will be an infrequent report and will be requested with a specific purpose. One example would be that as part of a periodic review of tariffs to ensure that the API schema is still providing the required information to TI Users or to provide information to inform Phase 2 of the TI Project and its extension to complex tariffs.
E.ON Next (Energy Supplier)	Because this report applies to all Electricity Suppliers, including smaller or niche suppliers who are not mandated by SLC 11C or choose not to opt-in, there is a risk of low data literacy or compliance lag. Furthermore, defining exactly what constitutes a tariff that "cannot be sent using the schema" requires subjective interpretation unless RECCo provides explicit, exhaustive guidance on what the current schema technically supports vs. what it excludes.	Thank you for your response. The Code Manager and RECCo will consider provision of additional guidance as and when this report is requested to help ensure a good quality response.

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Question 9:	Do you foresee any risks/issues around the request and submission arrangements for this 'Tariffs not in scope of Tariff Interoperability Arrangements'?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	Please see response to Q5	Noted. Thank you for your response.
SSE (Energy Supplier)	We would appreciate further clarification on the information expected from non-TI suppliers, as well as a clearer definition of what constitutes a “tariff” in cases where customer portfolios are primarily made up of bespoke tariff contracts. For instance, within a Day/Night tariff structure, would all customers be considered under a single tariff, or would each SSC – potentially priced differently within that structure – be treated as a separate tariff? Without clearer guidance, there is a risk that suppliers may interpret these requirements differently and therefore submit inconsistent data for what is essentially the same underlying information.	Thank you for your response. RECCo will consider provision of additional guidance as and when this report is requested to help ensure a good quality response.
E.ON Next (Energy Supplier)	The timeline for this ad-hoc report must account for product development cycles. If a supplier launches an innovative, complex tariff, they may need a grace period to evaluate if it fits the schema before being required to report it. RECCo should commit to a predictable, scheduled request cadence for this report (e.g., bi-annually) rather than purely ad-hoc triggers, allowing suppliers to build it into their standard regulatory reporting calendar.	Thank you for your response. The expectation is for this report to be ad-hoc to ensure that it is only requested when required. The Code Manager notes the comments on the time required to provide the information. Currently, there is no grace period for new tariffs that are required to be provided under SCL11C unless a Supplier specifically seeks

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		a derogation from Ofgem under the licence condition.

Question 10:	Given the intention to implement I0323 in February 2027, do you envision any issues with the lead time provided to build and test the requirements of the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	No this will be developed in line with the Phase 1a implementation go live date.	Noted. Thank you for your response.
SSE (Energy Supplier)	N/A	
E.ON Next (Energy Supplier)	The February 2027 timeline for Phase 1a is highly ambitious and presents a tight delivery window. The final API Technical Specifications and Energy Market Data Specification (EMDS) changes are slated for consultation and implementation "later in 2026." If these are not fully baselined and legally frozen by Autumn 2026, suppliers will have less than 4–5 months to finalise architecture, build the integration endpoints, implement the monthly reporting pipelines, and execute comprehensive industry testing.	Noted. Thank you for your response.

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Question 11:	Do you foresee any risks to your qualification or migration plans to be delivered as part of MHHS implementation caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	No comment.	
SSE (Energy Supplier)	No	
E.ON Next (Energy Supplier)	Yes, resource contention is a severe risk. The industry is currently in the critical path for MHHS qualification, testing, and migration. Technical teams (solution architects, security experts, QA testers, and regulatory analysts) are heavily utilised by MHHS delivery. Overlaying a new TI Phase 1a delivery target in early 2027 creates a competing priority for highly specialised resources, risking delays to either the TI go-live or critical MHHS milestones.	Thank you for your response. The Code Manager considers that this comment is best targeted at the go-live date for TI Phase 1a, which was set in May 2026, rather that the changes to the PARC which are required to provide performance assurance.

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Question 12:	Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: A) Nil; B) Up to £9,999; C) Between £10,000 and £49,999; D) Between £50,000 and £99,999; or E) more than £100,000.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	At this stage, we have not completed a detailed impact assessment and are therefore unable to provide an estimate of the costs associated with implementing the proposed solution. Any assessment of potential design, build, testing and ongoing operational costs will be undertaken as part of the Phase 1A build activities, where the detailed requirements, solution design and implementation approach will be further developed. Once this work has been completed, we will be in a better position to evaluate and quantify any associated costs	Noted. Thank you for your response.
SSE (Energy Supplier)	N/A	
E.ON Next (Energy Supplier)	N/A	

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Question 13:	Do you identify any benefits to your business or the energy market through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	We consider that implementation of the proposed solution would deliver benefits for both Suppliers and the REC. The proposed solution would support improved monitoring and visibility of performance, enabling Suppliers to more effectively track their obligations and identify potential issues at an earlier stage. This would facilitate proactive management and help drive improvements in compliance and operational performance.	Noted. Thank you for your response.
SSE (Energy Supplier)	We are unable to see what tariff information we can provide that would meaningfully benefit a TI user. The cost of producing bespoke contract details through reporting requirements, given that these vary depending on timing and individual customer needs, significantly outweighs any potential value to TI users. We believe our non-domestic customers would gain greater value from a direct discussion focused on their specific requirements, allowing us to present pricing options tailored to their individual needs.	Thank you for your response. The Code Manager notes that this is a comment on the TI policy more generally rather than the specific Performance Assurance requirements for TI Phase 1a.
E.ON Next (Energy Supplier)	Market Transparency: Open access to public tariff data will foster healthier market competition and allow third-party innovators (TPIs) to develop better comparison and energy-management tools for consumers.	Noted. Thank you for your response.

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	Future-Proofing: The data collected via the Tariff Structure Report (2120) will provide an excellent baseline for Phase 2, ensuring that subsequent regulations are informed by real-world market offerings. Reduced Compliance Friction: The use of the Maintenance of Qualification Annual Statement minimises routine administrative friction for compliant suppliers.	

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Question 14:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Energy Supplier)	We have no further comments.	
SSE (Energy Supplier)	We would appreciate clearer guidance on which Non-TI suppliers will be included in Phase 1b and therefore become subject to these reporting requirements. In addition to developing API compatibility, we will need to determine where and how to source the data required to meet the reporting obligations currently applied to TI suppliers. The uncertainty around whether this work is necessary is costly and is impacting our ability to plan and deliver existing projects.	Thank you for your response. RECCo will consult on the TI Phase 1b proposals later this summer. It is not expected that TI Phase 1b will amend SLC11C and therefore there will be no change to the suppliers that are required by this licence condition to provide tariff data.
E.ON Next (Energy Supplier)	We strongly urge RECCo to release the final TI Monitoring Tool performance assurance criteria and testing scripts as early as possible. If suppliers are to be monitored via randomised active polling, we must have the ability to whitelist RECCo's polling endpoints and verify that the monitoring traffic does not inadvertently trigger supplier cybersecurity mitigation protocols (e.g., Distributed Denial of Service / rate-limiting protections).	Thank you for your response. The TI Monitoring Tool will be made available to support Supplier with their testing ahead of TI Phase 1a. As the TI Monitoring Tool is expected to operate as a TI User, and any person can become a TI User with open access to the Supplier's tariff API, RECCo considers that the Tariff Monitoring Tool does not need to be whitelisted.

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