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IMPACT ASSESSMENT REQUEST

I0323 – TARIFF INTEROPERABILITY PHASE 1A – SUPPLIER PERFORMANCE ASSURANCE REQUIREMENTS

VERSION	1.0
DATE ISSUED	05/06/2026
RESPONSE DEADLINE	26/06/2026
PARTY RESPONSES REQUESTED	Energy Suppliers

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OVERVIEW

This Issue seeks to propose the addition of proportionate and targeted Tariff Interoperability (TI) reporting obligations on Suppliers.

LINKS

- Portal page link
- Change Report (Proposal Plan)
- Link to Legal drafting

BACKGROUND

The Department for Energy Security and Net Zero (DESNZ), in partnership with RECCo, developed and consulted on Tariff Interoperability proposals.[1] 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 Arrangements.[2,3] 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.[4] Phase 1b, which will go live in November 2027, provides Registered Tariff Interoperability (RTI) Users with access to Customer Specific Tariff Information[5] 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.[6]

The November 2025 consultation indicated that RECCo would raise a REC proposal (I0323) to implement the required changes to the Performance Assurance Report Catalogue (PARC) to assure the performance of TI Energy Suppliers (i.e. Electricity Suppliers mandated by SLC11C and those that have opted in) in live operation.

RECCo has updated its consultation proposal and will not require TI Energy Suppliers to send a daily API message with performance data. Following consideration of responses to the consultation, RECCo are of the view that the consulted-on approach is disproportionate at this point in time. The decision to move away from the daily API and to a monthly report is reflected in Schedule 35 Tariff Interoperability Arrangements paragraph 2.17 (b). The reasons for this decision are set out in paragraph 77 of the Government Response.

[1] Tariff Interoperability Consultation November 2025

[2] These changes were made by DESNZ using its Energy Act 2023 powers.

[3] Government's consultation response was published 13 May 2026 on RECCo's Website and the decision notice was published 18 May 2026 on GOV.UK

[4] TI Energy Suppliers are Electricity Suppliers that are mandated to provide data as set out in new Electricity Supply SLC11C as well as any electricity or gas supplier that has opted into the TI Arrangements. TI Users are not regulated under the REC and can be any organisation or person.

[5] Customer Specific Tariff Information will include a customer's specific tariff as well as notification of changes to the tariff details, a switch and removal of the customer's consent to access data. Because of the personal nature of the data, RTI Users must enter into a User Agreement with RECCo to bind them to obligations set out in the REC.

[6] Phase 2 of the Tariff Interoperability project will extend the requirement to provide tariff data to more complex tariffs and to the gas market.

Having further considered the new TI requirements, RECCo considers that it would be proportionate to assure some of these through the Maintenance of Qualification Annual Statement rather than through additional performance reporting set out in the PARC.

SOLUTION OVERVIEW

The solution proposed by this Issue is summarised below:

- **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%);
  - 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.

- **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.

- **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.

- **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 I0323 to obtain industry views and for transparency).

- **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 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', I0323 does not propose to assure TI User performance. To mitigate risk, 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.

QUESTIONS

No.	QUESTION
1	Do you have any comments on the proposed solution?
2	Do you agree the proposed solution addresses the problem statement? If not, please provide details.
3	Are there any alternate solutions that would better meet the needs of the problem statement?
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?
5	Do you foresee any risks/issues with the design of the proposed 2100 report 'Tariff Interoperability Energy Supplier Performance Assurance'?
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'?
7	Do you foresee any risks/issues around the request and submission arrangements for this Tariff Interoperability Energy Supplier API Error Code Report'?
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'?
9	Do you foresee any risks/issues around the request and submission arrangements for this 'Tariffs not in scope of Tariff Interoperability Arrangements'?
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.
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?

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.
13	Do you identify any benefits to your business or the energy market through the implementation of the proposed solution?
14	Do you have any other comments relating to this Change Proposal?