RETAIL ENERGY CODE

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REC ISSUE SUBMISSION FORM (COPY)

1 PERSONAL DETAILS

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COMPANY TYPE *(Optional)*	Code Body/Administrator
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2 ISSUE SUMMARY

ISSUE TITLE *(Mandatory)*	Introduction of Consumer Consent Solution
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	Ofgem has selected RECCo as the delivery body responsible for developing a Consumer Consent Solution (CCS) that empowers consumers to control the value generated by their energy data. Consumer consent is key to a more transparent, efficient, and consumer-centric energy market. This initiative will support the transformation of how energy is managed and consumed by giving consumers control over their energy (gas, electricity, heat, or other) data, enabling innovation through third-party services, and advancing sustainability goals. Delivery of the CCS is being managed through a bespoke RECCo project covering the procurement of technical service providers; design, build and test of the CCS; and definition of the governance framework and associated REC drafting. The CCS provisions will be introduced into the REC via standard REC change governance. This REC Issue is being raised to promote visibility and awareness of

	opportunities for engagement, in advance of the CCS Change Proposal being progressed.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	This REC Issue and the associated Change Proposal will ensure that the appropriate obligations, processes and provisions are defined within the REC, enabling a successful delivery of enduring CCS governance and operational arrangements. In February 2026, Ofgem published its final impact assessment which explains that several projects and analyses of the energy sector have identified the lack of a single, standardised process for obtaining and managing consumer consent as a major blocker for access to smart meter data with the following issues identified: • Reduced visibility of demand on the network which hampers planning and effective balancing of markets. • This reduced visibility further hampers forecasting, necessitating more assumptions; in turn reducing accuracy, and requiring greater redundancy in increased generation cost. • Fewer positive consumer outcomes through tailored offerings from industry, and less consumer value available through use of data. • Challenges in the customer journey through increased complexity, friction, and repetition, leading to lower consumer engagement. Ofgem explained that the requirement to reach clean power by 2030 (CP30) is planned to rely on 10 - 12GW of consumer-led flexibility in the energy system. There is therefore a clear need for a reliable and scalable consumer consent mechanism and scalable access to smart meter data to support the requisite growth in consumer-led flexibility. https://www.ofgem.gov.uk/sites/default/files/2026-01/Consumer Consent Solution impact assessment %28final%29.pdf
WHAT DO YOU CONSIDER TO BE AN EFFECTIVE SOLUTION? *(Mandatory)*	The solution is being defined through the CCS project and will include: - the delivery of a technical service for managing consumer consent - a consumer portal for consumers to view and manage their consents - a set of Customer Experience Guidelines defining the required user interactions for engaging with consumers - a governance framework setting out how assurance of the CCS arrangements will work and how issues and

	disputes will be handled. An effective solution will be the robust definition of these elements within the REC
IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE ISSUE THAT WOULD BE USEFUL? *(Optional)*	Ofgem issued its Consumer Consent Solution consultation in August 2024, setting out the rationale for introducing a central consent mechanism and its minded to position for RECCo to be the chosen delivery body. In April 2025, Ofgem published its Consumer Consent Decision confirming RECCo's role, and defining the core objectives of the solution alongside proposed design principles to support the ongoing development. Three industry working groups were established to advise RECCo on the design and delivery of the CCS, with the proposed design, governance and user experience frameworks documented within the CCS design consultation issued 11 February 2026 Further information on the CCS project with links to the Ofgem decision document can be found on the CCS Hub within the REC Portal: https://recportal.co.uk/consumer-consent-hub
DOES THIS ISSUE RELATE TO AN EXISTING ISSUE RAISED OR AN EXISTING CHANGE PROPOSAL? IF SO, PLEASE PROVIDE DETAILS OF THE ISSUE OR CHANGE PROPOSAL.	No

3 CONSUMER IMPACTS

WHICH CONSUMER TYPES WILL BE IMPACTED BY THIS ISSUE? *(Mandatory)*	☒ All ☐ Electricity ☐ Gas ☐ Domestic Prepayment ☐ Domestic Credit ☐ Microbusiness ☐ Small and Medium Enterprise (SME) ☐ Industrial and Commercial (I&C) ☐ Other (please specify in the Additional information box below)

WHAT IMPACT WILL THIS ISSUE HAVE FOR THESE CONSUMERS? *(Mandatory)*	☒ Switching experience ☒ Billing accuracy ☒ Trust and confidence ☐ Safety ☐ Security of supply ☐ Ability to pay ☐ On site experience ☐ Achieving Net Zero ☒ Other (please provide details in the Additional information box below)
ADDITIONAL INFORMATION *(Optional)*	The CCS will introduce a central mechanism for managing consent and a consumer portal enabling consumers to view and manage existing consents. This will provide increased visibility for consumers regarding the use of their energy data and will empower consumers by providing secure, transparent, and efficient management of their energy data.

DOES THIS ISSUE CONTRIBUTE TO THE ACHIEVEMENT OF NET ZERO? *(Mandatory)*	
ADDITIONAL INFORMATION *(Optional)*	

4 CODE IMPACTS

Does this Issue relate to or impact:

THE REC OR REC SCHEDULES? *(Optional)*	☒ Main Body ☒ Schedule 1 - Interpretations and Definitions Schedule ☐ Schedule 3 - Accession Agreement ☐ Schedule 4 - Company Governance ☐ Schedule 5 - Change Management ☐ Schedule 6 - Performance Assurance ☐ Schedule 7 - Energy Theft Reduction

	☐ Schedule 8 - Unbilled Energy Code of Practice ☒ Schedule 9 - Qualification and Maintenance ☒ Schedule 10 - Charging Methodology ☐ Schedule 11 - Prepayment Arrangements ☐ Schedule 12 - Data Access ☐ Schedule 13 - Transfer of Consumer Data ☐Schedule 14 - Metering Operations ☐ Schedule 15 - Metering Accreditation ☐ Schedule 17 - Secure Data Exchange ☐ Schedule 18 - Green Deal Arrangements ☐ Schedule 19 - Market Exit and Supplier of Last Resort ☐ Schedule 22 - Market Stabilisation Charge ☐ Schedule 23 - Registration Services ☐ Schedule 24 - Switching Data Management ☐ Schedule 25 - Central Switching Service ☐ Schedule 26 - Switching Service Management ☐ Schedule 27 - RMP Lifecycle Schedule ☐ Schedule 28 - Related Metering Points ☐ Schedule 29 - Address Management ☐ Schedule 30 - Resolution of Consumer Facing Switching and Billing Issues ☐ Schedule 31 – Prepayment Method Levelisation Reconciliation ☐ Schedule 32 - Electricity Supply to Hydrogen Electrolysers ☐ Schedule 33 - Non Domestic Change of Occupier
ADDITIONAL INFORMATION *(Optional)*	In addition, a new CCS Arrangement Schedule will be introduced

OPERATIONAL DOCUMENTS *(Optional)*	☐ Consolidated Metering Code of Practice (CoMCoP) ☐ Cross Code Steering Group Terms of Reference ☐ Performance Assurance Board Terms of Reference ☒ Performance Assurance Report Catalogue ☐ REC Change Panel Terms of Reference ☐ Smart Meter Installer Domestic Customer Survey ☐ Smart Meter Installer Microbusiness Customer Survey

ADDITIONAL INFORMATION *(Optional)*	In addition, Customer Experience Guidelines will be introduced as a new Category 2 REC product.

SERVICE SPECIFICATION *(Optional)*	☐ Central Data Service Provider Further Services Service Definition ☐ Central Switching Service Definition ☐ CSS Certificate Authority Service Definition ☐ Electricity Enquiry Service - Service Definition ☐ Electricity Retail Data Service Definition ☐ Gas Enquiry Service Definition ☐ Gas Retail Data Service Definition ☐ Green Deal Database Service Definition ☐ Secure Data Exchange Service Definition ☐ Switching Operator Service Definition
ADDITIONAL INFORMATION *(Optional)*	In addition, a new CCS Service Definition will be introduced

API TECHNICAL SPECIFICATION *(Optional)*	☐ EES API Technical Specification ☐ GES Meter Asset Enquiry API Technical Specification ☐ GES Supply Point Switching API Technical Specification ☐ GES Supply Point Enquiry API Technical Specification
ADDITIONAL INFORMATION *(Optional)*	In addition, a new CCS API Technical Specification will be introduced

THE DATA SPECIFICATION *(Optional)*	☐ Data Access Matrix ☒ Data Item Catalogue ☒ Market Message Catalogue ☒ Standards Definition ☐ Supply Number Format
ADDITIONAL INFORMATION *(Optional)*	New Data Items and Market Messages will be defined to reflect the API interactions required to support consent management activities. This may result in changes to the Standards Definition (to be confirmed)

CENTRAL SYSTEMS OR REC SERVICES? *(Optional)*	☐ Central Data Service Provider Further Services ☐ Central Switching Service (CSS) ☐ CSS Certificate Authority ☐ Electricity Enquiry Service ☐ Electricity Retail Data Service ☐ Electricity Theft Tip Off Service ☐ Gas Enquiry Service ☐ Gas Retail Data Service ☐ Green Deal Central Charging Database ☐ Secure Data Exchange Service ☐ Switching Operator
ADDITIONAL INFORMATION *(Optional)*	A new Consumer Consent Service will be created to deliver the central consent management solution and consumer portal.

REC PARTIES AND/OR MARKET PARTICIPANTS? *(Optional)*	☐ AMR Service Providers ☐ Data Aggregators ☐ Data Collectors ☐ Data Services ☐ Smart Meter Data Retrievers ☐ DCC ☐ Distribution Network Operators ☒ Energy Suppliers ☐ EES Users ☐ Gas Transporters ☐ GDCC Users ☐ GES Users ☐ Green Deal Finance Parties ☐ Green Deal Providers ☐ Meter Asset Providers ☐ Metering Equipment Managers ☐ Shippers ☒ Third Party Intermediaries ☐ Virtual Lead Party ☒ Other (please provide details in the Additional Information box)
ADDITIONAL INFORMATION *(Optional)*	The change will introduce CCS Users and a CCS Provider. There are no direct impacts on the market roles listed above apart from Energy Suppliers. However, existing REC Parties and Non-Party REC Service Users may choose to become CCS Users. The

	REC Code Manager will also be impacted by the increased scope of Non-Party REC Service Users.

OTHER INDUSTRY CODES? *(Optional)*	☒ Balancing & Settlement Code (BSC) ☐ Distribution Code Use of System Agreement (DCUSA) ☒ Smart Energy Code (SEC) ☐ Uniform Network Code (UNC) ☐ Independent Gas Transporter Uniform Network Code (IGT UNC) ☐ Data Integration Platform (DIP) Rules
ADDITIONAL INFORMATION *(Optional)*	Impacts to be confirmed. BSC – the new BSC provisions being introduced via P494 relating to the Smart Data Repository (SDR) will require SDR Users seeking to access consumer personal data to manage consent via the CCS. SEC – existing SEC Other Users are expected to use the CCS as a standard approach for managing consumer consent. This may require changes to the SEC Privacy Controls Framework.

DOES THIS ISSUE IMPACT A SIGNIFICANT CODE REVIEW? *(Optional)*	No
ADDITIONAL INFORMATION *(Optional)*	

5 ISSUE PROGRESSION

DO YOU BELIEVE THIS ISSUE PROPOSAL MEETS THE CRITERIA FOR 'URGENCY' AND SHOULD BE PROGRESSED UNDER AN URGENT TIMETABLE? **IF SO, PLEASE PROVIDE JUSTIFICATION?** *(Optional)*	No

ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OF THIS ISSUE? *(Option)*	This REC Issue is being raised to facilitate visibility of the CCS project being progressed under RECCo governance, with the expectation that it will be ready to progress, with a fully defined solution, as a CP in Q3 2026.
ARE THERE ANY REQUIRED TIMESCALES FOR THE IMPLEMENTATION OF THIS ISSUE? *(Option)*	We propose to formally progress the CP in Q3 2026 alongside development of the CCS technical solution. The CP will need to be implemented alongside Phase 1 of the CCS in Q1 2027.
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THIS ISSUE WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	

6 ATTACHMENTS

ATTACH/PROVIDE ANY SUPPORTING DOCUMENTS TO BE SUBMITTED WITH THE FORM	