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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0323 - TARIFF INTEROPERABILITY PHASE 1A – SUPPLIER PERFORMANCE ASSURANCE REQUIREMENTS

On 14 August 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0323.

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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Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	We do not agree with all elements of the solution to this change. We agree the new reports being added to the PARC (2100 and 2110) are appropriate, and the data being requested fulfils the performance monitoring requirements for tariff interoperability, and the live monitoring tool is a smart solution to audit availability. However, the addition to the annual qualification statement is surplus to requirements. The annual statement already asks: "*I confirm, to the best of my knowledge based on reasonable enquiry, as an organisation qualified under the REC, that:* • *Management have understood the applicable requirements under the Retail Energy Code, including any obligations that have changed since qualification;* • *Management are not aware of any non-compliance to maintain being Qualified under the REC; and* • *The operational contacts on the REC Portal are up to date and accurate*" Due to the requirements for provision of tariffs, customer support and TI user support already being embedded within Schedule 35 the existing	Thank you for your response. The Code Manager discussed this matter with RECCo and the wider Tariff Interoperability Programme. It was subsequently agreed that the Tariff Interoperability provisions within the Annual Statement should be retained for a period of two years, providing an implementation assurance mechanism at supplier director level. At the end of this period, a formal review and active decision will be required to determine whether sufficient long-term value exists to justify the continued retention of these provisions.

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	statement already confirms compliance to these elements making the new statement a duplication. Whilst this would not be an issue to confirm annually, it sets an unnecessary precedent of independently confirming compliance to each REC process in isolation.	
British Gas (Energy Supplier)	**Position: Support with changes.** British Gas supports the introduction of proportionate Performance Assurance arrangements for Tariff Interoperability Phase 1a. We agree that RECCo should have appropriate mechanisms in place to monitor supplier compliance once the Tariff Interoperability arrangements go live. The proposal introduces a combination of annual attestation requirements, monthly reporting and ad hoc reporting that is intended to provide visibility of supplier performance against the new obligations. **Key concerns** • Clarity on the respective roles of supplier reporting and independent monitoring. RECCo is developing a Tariff Interoperability Monitoring Tool that will monitor API availability, response times and schema compliance. British Gas would welcome clearer explanation of which assurance objectives will be delivered through supplier reporting and which will be delivered through independent monitoring. This would help demonstrate that reporting requirements remain proportionate and avoid unnecessary duplication of assurance activity. • Clarity of reporting ownership. Much of the information proposed within PARC 2100 appears operational and technical in nature. Suppliers will need sufficient time to identify business owners and reporting processes before any obligations commence. We would suggest that the new Performance Assurance obligations	Thank you for your response. The monitoring tool allows RECCo to undertake a randomised dip check on Supplier performance. It will test performance on specific aspects (availability, response timescales and schema compliance). However, this only covers a point in time. The Supplier monthly report allows RECCo to understand performance across the full compliance period (i.e. a month) and on a wider range of metrics e.g. request and response volumetrics, availability and response times across the period and demand led suspension of service. RECCo signalled the intention to introduce Performance Assurance requirements in the November 2025 consultation on TI Arrangements. These proposals were refined in the May '2026 Government Response' to move away from daily reporting and to require a monthly report from Suppliers. The detailed proposals have been discussed at TI Working Group (TIWG), Implementation

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	are communicated clearly to Suppliers through RECCo's Tariff Interoperability Programme team as part of pre-18 February 2027 readiness activities. This would help ensure Suppliers have sufficient time to identify reporting owners and establish the necessary reporting processes. • Purpose of PARC 2120. We understand the wider policy objective of understanding tariff structures that fall outside the current Tariff Interoperability arrangements. However, clearer justification would be helpful regarding how frequently this report is expected to be requested, how the information will be used, and what specific assurance risk it is intended to mitigate. British Gas would welcome greater clarity regarding scope, proportionality and intended usage before the obligation takes effect. PARC 2120 appears different in nature to the other proposed Performance Assurance obligations, as it focuses on explaining why certain tariffs fall outside the scope of the arrangements rather than monitoring actual performance against Tariff Interoperability requirements for in-scope tariffs. **Recommendation** British Gas supports implementation of the proposal but recommends that RECCo clearly demonstrates how duplication between independent monitoring and supplier reporting will be avoided, and provides further guidance on the expected use and frequency of the proposed ad-hoc reporting obligations.	working group (IWG) and issued the Change Proposal for impact assessment with a clear expectation on implementation timescales to allow Parties to make the required changes for go-live. RECCo will continue to communicate the requirements through TIWG and IWG and other comms routes to support party readiness. In relation to report 2120, the Code Manager engaged with RECCo and the wider TI Programme on this matter. Following discussions with the Department for Energy Security and Net Zero (DESNZ), it was agreed that report 2120 should be retained within the solution delivered by this Change Proposal, as the information collected through the report is considered necessary to support the intended objectives of the proposal.
E.ON Next (Energy Supplier)	Yes. We agree with the proposed solution. As we noted in our Party Impact Assessment response, we strongly welcome the decision to pivot away from a daily API performance data message toward a	Thank you for your response. The performance measures referenced reflect the REC requirements implemented by

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	monthly reporting framework (monthly Performance report 2100) 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 wish to reiterate several key operational risks and technical alignment points that must be addressed as the solution is operationalised: • **Strict Performance Thresholds**: The 99.9% availability requirement is exceptionally high, and the throughput targets (1,000 requests/second steady state and up to 5,000 requests/second peak) require highly resilient cloud infrastructure and extensive load testing. Ensuring compliance will involve material ongoing operational effort and compute provisioning. • **Data Alignment & Reconciliation**: There is an inherent risk of discrepancies between suppliers' self-reported monthly metrics and the randomised polling data captured by RECCo's independent TI Monitoring Tool. Clear reconciliation guidelines are essential for cases where the Monitoring Tool flags a drop in availability that is not reflected in the supplier's internal logs. • **Logging and Extraction Overhead (Report 2110)**: Storing and indexing up to 3 months of API Error Codes (Report 2110) could degrade database performance or incur significant cloud extraction fees unless managed via scalable log aggregators.	the SoS in May 2026. Any update to this would need to be progressed as a REC Issue/ Change Proposal. For the avoidance of doubt, R0323 does not introduce additional operational performance thresholds. For the second point, on data alignment and reconciliation, this is included in the comment above. In relation to the logging and extraction overhead for report 2120, the Code Manager notes that following wider engagement with the wider TI programme, the structure of this report is now being amended, by reporting on TI User Error Codes. It is anticipated that this amendment will help address the concerns raised regarding the operational burden of producing the report. In relation to report 2120 comment, the Code Manager can confirm that when RECCo intends to request this information it will ensure that it communicates this to all Parties and provides guidance where required. On the future architecture for a centralised API Gateway, the Code Manager noted the comment but is noting that this sits out of R0323 scope The Code Manager has shared

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	While the one-month turnaround for ad-hoc requests is reasonable, the data management overhead remains real. • **Low Data Literacy & Cadence for Out-of-Scope Tariffs (Report 2120)**: For smaller or niche suppliers who are not mandated or choose not to opt-in, there is a risk of compliance lag under the 2120 report. Subjective interpretations of what constitutes an out-of-scope tariff must be avoided. RECCo should provide explicit, exhaustive guidance on schema limitations and establish a predictable, bi-annual request cadence rather than relying purely on ad-hoc requests. • **Future Architecture - Centralised API Gateway**: While the monthly self-reporting and polling tool is acceptable for Phase 1a, we believe a centralised API Gateway hosted by RECCo would be the optimal solution for future phases (Phase 1b / Phase 2). This would lift the reporting, authentication, security, and metrics collection burdens entirely off individual suppliers.	these comments with RECCo and the wider TI programme.
ENGIE (Energy Supplier)	As a non-domestic supplier which does not meet the threshold to be a TI Supplier, we do not feel that that there is sufficient clarity around the reporting requirements for non-TI suppliers and we are not certain that the wording in the PARC is aligned with the licence requirements set out in SLC 11C. As this is the only element of the proposals that directly impacts us, it is the only aspect of the proposal that we are commenting on in this response.	The Code Manager has considered this feedback and sought legal advice. Legal review confirms that the obligations within SLC 11C apply to all Electricity Supply Licensees, including Non-Domestic Suppliers, except where a Supplier meets the exemption criteria set out in SLC 11C.3. The Code Manager considers that the proposed PARC drafting accurately reflects the requirements of SLC 11C, as the reporting

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		obligation relates solely to tariffs not made available under SLC 11C.5.

Question 2:	Do you agree with the proposed implementation approach (BIG BANG)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	We agree with the proposed implementation methodology.	Noted. Thank you for your response.
British Gas (Energy Supplier)	**Position: Support.** British Gas supports the proposed Big Bang implementation approach. The reporting requirements are directly linked to the implementation of Tariff Interoperability Phase 1a. Aligning the assurance arrangements with the wider go-live date provides a clear and consistent approach to monitoring compliance from day one. **Key considerations** • Suppliers require sufficient time to identify reporting owners, implement supporting processes and understand reporting requirements. • Reporting obligations should not create unnecessary operational burden where equivalent information is already available through central monitoring solutions.	Noted. Thank you for your response. The Code Manager engaged with RECCo and confirmed that RECCo will work with Parties where additional guidance is needed. The intention is that the required supporting information and templates are recorded as part of the PARC changes.

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	• Any implementation guidance, templates or supporting documentation should be made available as early as possible to support readiness activities. **Recommendation** British Gas supports the implementation approach and encourages RECCo to provide guidance and reporting templates ahead of implementation to support consistent reporting across industry.	
E.ON Next (Energy Supplier)	Yes, we agree in principle with the Big Bang approach. We agree that a single 'Big Bang' go-live is the most logical approach to align the reporting obligations of R0323 with the wider Tariff Interoperability Phase 1a implementation date of 18 February 2027. This ensures consistency and market-wide synchronisation from Day 1. However, we must emphasise that this represents a high-risk transition given the very tight timescales and resources constraints (discussed below). We accept the Big Bang in principle but only if the pre-requisite technical baselines are strictly locked in early enough. Specifically: The API Technical Specifications and Energy Market Data Specification (EMDS) changes must be frozen early. If these are not legally finalised by Autumn 2026, the 4-to-5-month window remaining for suppliers to design, build, and test will be severely compromised, making an all-at-once launch highly risky. RECCo's own Digital Service Provider (DSP) Portal changes and the SFTP ingestion mechanism must be fully functional and tested well ahead of the go-live. Suppliers cannot afford to run comprehensive industry testing against unstable central systems.	Noted. Thank you for your response. RECCo currently expects to publish its decision regarding the TI Phase 1a Technical Specification at the end of October 2026, to facilitate its inclusion in the November 2026 REC Release in accordance with the planned implementation timetable.

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ENGIE (Energy Supplier)	No comment.	Noted. Thank you for your response.

Question 3:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	We agree with the assessment of costs and benefits for this change.	Noted. Thank you for your response.
British Gas (Energy Supplier)	**Position: Partially agree.** British Gas agrees that the proposal is likely to deliver assurance benefits by increasing visibility of supplier compliance and supporting monitoring of the new Tariff Interoperability obligations. Enhanced transparency may also help identify operational issues and support continuous improvement across the market. However, we consider that the consultation provides limited information regarding the likely costs and administrative burden associated with the new reporting obligations. **Key concerns** • Suppliers may incur costs to establish new reporting processes, identify data owners and extract operational information that is not currently compiled for regulatory reporting purposes.	Thank you for your response. The costs noted in the report have been based on the responses received by the Code Manager during the Party impact assessment and Service Provider impact assessment. RECCo confirmed that the principal benefit of this Change Proposal is to ensure the successful introduction of TI as a new REC business process and to build confidence in its operation. As the arrangements mature and become established, the monitoring requirements may be reviewed and scaled back where they are no longer required.

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	• Additional effort may be required to respond to ad-hoc reporting requests, particularly where historical technical or operational data is required. • Where information is already available through RECCo's monitoring capability, duplicate reporting may create avoidable costs without delivering additional assurance value. **Recommendation** British Gas would welcome further information quantifying the expected benefits of the proposed reporting obligations and explaining why supplier-provided reporting is required where equivalent information may already be available through independent monitoring solutions.	
E.ON Next (Energy Supplier)	[N/A]	
ENGIE (Energy Supplier)	No comment.	Noted. Thank you for your response.

Question 4:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Performance Assurance Board?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	We agree with the assessment of the change path for this change.	Noted. Thank you for your response.

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British Gas (Energy Supplier)	**Position: Support.** British Gas supports the Code Manager's assessment that this proposal is appropriate for the Self Governance route. The proposal introduces Performance Assurance reporting and monitoring arrangements associated with obligations that have already been established through the wider Tariff Interoperability framework. The change does not introduce new policy objectives and is focused on assurance and reporting implementation. Accordingly, we consider the proposal suitable for determination by the Performance Assurance Board.	Noted. Thank you for your response.
E.ON Next (Energy Supplier)	Yes. We agree with the proposed Change Path.	Noted. Thank you for your response.
ENGIE (Energy Supplier)	No. As the change includes elements (such as the Non-TI Supplier reporting requirements) which are dependent upon an interpretation of SLC11C, we believe the decision should sit with the Authority. This will also ensure that there is a clear statement of the compliance requirements in the Authority decision.	Noted. Thank you for your response.

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Question 5:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 18 February 2027? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	We agree with the proposed implementation date of this change, given the date of the first requested 2100 report with be 01/04/2027.	Noted. Thank you for your response.
British Gas (Energy Supplier)	**Position: Support with conditions.** British Gas supports implementation on 18 February 2027 to align with the wider Tariff Interoperability Phase 1a go-live date. However, successful implementation will depend on suppliers having sufficient clarity regarding: • Reporting ownership and governance. • Reporting formats and submission requirements. • The interaction between supplier reporting and RECCo's monitoring capability. • The purpose and expected usage of ad-hoc reporting requirements. Provided this information is made available in a timely manner, British Gas supports the proposed implementation date.	Noted. Thank you for your response.
E.ON Next (Energy Supplier)	Agree in principle, but we maintain serious concerns regarding feasibility and resources.	Noted. Thank you for your response.

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	While we accept that the implementation date of 18 February 2027 is aligned with the wider Tariff Interoperability Phase 1a go-live date set by DESNZ, we must strongly reiterate the significant delivery risks first raised in our Impact Assessment response: **Severe Resource Contention with MHHS**: The industry is currently on the critical path for Market-wide Half-Hourly Settlement (MHHS) qualification, testing, and migration. The exact technical and assurance teams (solution architects, security experts, QA testers, and regulatory analysts) required to deliver the TI Phase 1a requirements are heavily utilised by MHHS. Forcing a concurrent delivery timeline in early 2027 places immense strain on these specialised resources and introduces competing priorities that risk delays to either the TI go-live or critical MHHS milestones. **Highly Compressed Technical Lead Time**: The final TI API Technical Specifications and Energy Market Data Specification (EMDS) changes are only slated for consultation and implementation 'later in 2026.' If these technical designs are not fully baselined and legally frozen by early Autumn 2026, suppliers will be left with less than 4-5 months to finalise architecture, build integration endpoints, implement monthly reporting pipelines, and run comprehensive testing. To mitigate these risks, RECCo must ensure immediate technical baselining of specifications and provide a flexible, cooperative performance assurance transition period during the initial months of live operation, recognising the intense MHHS workload.	
ENGIE (Energy Supplier)	We are not able to approve the change without further clarity on the Non-TI Supplier reporting requirements.	Noted. Thank you for your response.

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Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	No.	Noted. Thank you for your response.
British Gas (Energy Supplier)	**Position: Additional comments provided**. British Gas supports the principle of proportionate Performance Assurance for Tariff Interoperability. **Key Message 1: Clarity on assurance approach** British Gas notes that RECCo is developing a Tariff Interoperability Monitoring Tool that will assess areas such as API availability, response times and schema compliance. We support the use of independent monitoring as part of the wider Performance Assurance framework. However, we would welcome further explanation of how the proposed supplier reporting obligations interact with the monitoring capability. In particular, British Gas would welcome clearer justification of which assurance outcomes require supplier-provided reporting and which are already expected to be evidenced through independent monitoring. This would help demonstrate that reporting obligations remain proportionate and targeted towards information that cannot be obtained through alternative means. **Key message 2: Clarify PARC 2120**	Noted. Thank you for your response. All points raised not addressed above have been shared with RECCo and the wider TI programme.

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	British Gas would welcome additional clarification regarding the purpose and expected use of PARC 2120. Suppliers already have obligations under Electricity Supply Licence Condition 11C relating to tariffs outside scope of the arrangements. It would be helpful to understand why additional Performance Assurance reporting is required, how frequently it is expected to be requested, and how the information will be used in practice. British Gas would welcome greater clarity regarding scope, proportionality and intended usage before the obligation takes effect. **Key message 3: Proportionate reporting** Where supplier reporting obligations are introduced, British Gas encourages RECCo to ensure that reporting requirements remain proportionate, targeted and focused on information that materially supports assurance outcomes.	
E.ON Next (Energy Supplier)	Yes. We strongly urge early visibility and collaboration on the TI Monitoring Tool. We strongly urge RECCo to release the final performance assurance criteria, active polling testing scripts, and target IP address ranges for the TI Monitoring Tool as early as possible. Because this tool will perform randomised, automated polling of supplier endpoints every few minutes, it is critical that suppliers are able to whitelist RECCo's polling endpoints. Without early coordination, this randomised active polling is highly likely to be flagged by suppliers' cybersecurity mitigation systems, potentially triggering automated rate-limiting, Web Application Firewall (WAF) blocks, or Distributed Denial of Service (DDoS) countermeasures. Early collaborative testing of the polling mechanism is essential to prevent	Noted. Thank you for your response. These points have been raised with RECCo and the wider TI programme. The Code Manager notes the comments regarding implementation timescales; however, the implementation timetable for TI Phase 1a is outside the scope of this Change Proposal. Notwithstanding this, to support a smooth and reliable go-live for TI Users and Consumers, the Code Manager considers that R0323 should be implemented in parallel with TI Phase 1a.

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	false-positive performance alerts and protect corporate network security. Furthermore, we reiterate our comment regarding the dual stack of MHHS and non-MHHS metering points. It is crucial that the Tariff Interoperability API technical specs and schemas are explicitly mapped and aligned with MHHS data entities (including consumption windows and Data Services formats) to avoid creating duplicative, complex IT translation layers within supplier legacy stacks during the transition phase.	The Code Manager further notes the comments relating to the technical design of the solution. These matters are considered outside the scope of this Change Proposal. Stakeholders were provided with an opportunity to comment on the technical design through the TI Phase 1a Technical Specification consultation, which closed on 17 September 2026.
ENGIE (Energy Supplier)	Our concerns with the Non-TI Supplier reporting requirements are as follows: • SLC11C.2 states that "subject to paragraph 11C.3" a licensee "must make available information related to its Charges for the Supply of Electricity….to Domestic Premises and Relevant TI Non-Domestic Premises and Export Tariffs". • SLC11C.3 states that the obligation to "make available information related to its Charges for the Supply of Electricity….to Domestic Premises and Relevant TI Non-Domestic Premises and Export Tariffs in accordance with the Retail Energy Code Requirements" does not apply to a "licensee in conjunction with its Affiliates [which] supplies electricity to no more than 100,000 Relevant TI Non Domestic Premises" or would only be required to make information available on "Deemed Contracts and/or Out of-contract Contracts".	Please see comments provided above for question 1.

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	• SLC11C.5 provides some exceptions where "the licensee shall not be required to make available the information in accordance with paragraph 11C.2". • SLC11C.7 requires that the licensee "must keep a record of, and make available on request to the Secretary of State or to the Authority…the structure of any Charges for the Supply of Electricity or Export Tariffs that it does not make available in accordance with the requirements of 11C.2 by virtue of paragraph 11C.5". • The legal text of REC PARC Report 2120 states that "Each Electricity Supplier is required to provide details of the structure of any relevant Charges for the Supply of Electricity to Domestic and Relevant Non-Domestic Premises and Export Tariffs that it does not make available under Electricity Supply SLC 11C.2". Although not explicitly stated in the 2120 report, this appears to relate to the record-keeping requirement in SLC11C.7.	

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