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Dear Energy System Digitalisation Team,

We welcome this opportunity to respond to Ofgem's consultation on the Consumer Consent Impact Assessment. **Citizens Advice has advocated for a consumer consent portal to allow consumers to understand and make choices about their data consents since the DCC contract was first awarded in 2013.**

Under the current model there is no straightforward way for a consumer to establish who is accessing their smart meter data or for what purposes this collection is happening. This makes it effectively impossible for them to consistently exercise a right to make informed choices about this data sharing.

The ability to make choices as to whether or not to share smart meter data is important to consumers. The number of consumers who say that it is either important or very important that they be able to opt-out of sharing their smart meter data has risen over the years from 89% in 2019<sup>1</sup> to 92% in 2024<sup>2</sup>. Those who make the most use of smart-enabled products and services are most likely to rate it as important, therefore we should anticipate an increased appetite for better control as more services make use of smart energy data.

We also note that Ofgem's own figures indicate that the rate of consumer data opt-out is consistently very low. This is not a contradiction as the value and importance lies in the reassurance that consumers have the necessary information and ability to make a choice. The aim of the Consent Dashboard must be to deliver genuine transparency and choice, or its value could be significantly diminished.

In 2018, we worked with the DCC to create a proof of a concept "Smart Meter Data Dashboard" which provided a sense of what such a consent portal could look like and how it could work to

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<sup>1</sup> Citizens Advice - [Clear and in Control](#) (2019)

<sup>2</sup> Citizens Advice - [Response to Ofgem's Consultation on a Consumer Consent Solution](#) (2024)

meet consumer needs to both see and make choices about their smart meter data<sup>3</sup>. We also facilitated workshops with key industry and government stakeholders to find consensus on how it could work and be implemented successfully. **In 2022, we successfully made the case for this dashboard to be included in the Energy Systems Catapult's report on energy digitisation<sup>4</sup> where it became a core recommendation.**

This work identified key consumer needs that the portal must address:

- Providing consumers information on who is accessing their smart meter data, why they are accessing it, in what detail and over what period of time
- Providing consumers with the ability to opt-out or change the sharing settings of their smart meter data. There is some data sharing that they will not be able to opt-out of, but they must still be able to see these data flows to avoid the perception that there are further undisclosed parties accessing their personal data
- Providing a single vision of the above data in a way that is easy for consumers to access wherever they are on a customer journey. Our view has consistently been that this should be in the form of a widget or white-label model whereby multiple organisations can offer access to the same tool and information

We were strongly supportive when Ofgem announced that they would be adopting our recommendation and developing the tool and have since engaged with working groups and bilaterals to continue supporting the project. While Citizens Advice believes there is still a strong need for such a consumer tool, we are concerned that as the project has developed it is losing sight of its original purpose. It risks shifting from a consumer-facing tool to provide reassurance, transparency and control, to a tool that provides a convenient means for industry to gain consumer consent for specific services.

In particular, the core principle of providing consumers visibility of who is accessing their data appears to have been deprioritised, with the focus shifting to specific organisations who wish to make use of the portal. When building our proof of concept, we worked with the DCC to confirm that it would be possible to show all DCC consumer data flows on the tool. While there will be some additional movement of consumer smart meter data outside of the DCC, this is likely to represent the majority, and is therefore the most obvious starting point.

Recent conversations with the RECCO have indicated that the tool will not provide access information nor will it identify all DCC users who are accessing consumer data. If this were to

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<sup>3</sup> Citizens Advice - [The Smart Meter Data Dashboard](#) (2018)

<sup>4</sup> Energy Systems Catapult - [Delivering a Digitalised Energy System](#) (2022)

happen, it will result in a significant reduction in the usefulness of the tool as a means to give consumers the confidence to engage with smart energy services and represents a notable backward step in the functionality of the tool for consumers.

Beyond concerns about the tool no longer meeting expectations we note that other organisations like the Smart Energy Code (SEC) and DESNZ through their smart energy data consultations have assumed that the portal will have the functionality originally envisaged with regard to both transparency and control. However, if the tool is unable to provide this then these decisions may need to be revisited or presumed benefits scaled back accordingly.

If the product underdelivers by only providing very limited data then there is a risk this becomes self-reinforcing. A lack of functionality could result in lower engagement, which may in turn reduce the appetite to further improve and develop the tool in future. In short, we are concerned that the minimum viable product currently being proposed is unlikely to fully meet consumer needs and could fail to achieve the original goals of the project.

**We remain strongly committed to the core principles of the consent portal and call again on Ofgem and RECCO to ensure that it delivers the original benefits.** It will ultimately be consumers who pay the costs of developing this tool through their energy bills, so their needs should be the priority. Launching a well developed tool that is fit for purpose and centres consumer needs will promote trust in both smart data, smart meters and ultimately the smart energy services that can save consumers money and support our net zero goals.

Yours sincerely

Colin Griffiths