



Tariff Interoperability Arrangements Consultation

Proforma Response Document

Consultation closure date: Tuesday 20 January 2026



Overview

This is the proforma response document for the consultation on proposals for the Tariff Interoperability (TI) Arrangements that will introduce an obligation on Electricity Suppliers to make pricing data available in a standardised format.

This is an important government-led initiative which will make it easier for electricity customers to participate in consumer-led flexibility by automating how Energy Smart Appliances (ESAs) connect to price signals. This will enable consumers to save money on their electricity bills while also contributing to making Great Britain a clean energy superpower.

This consultation is led by the Department for Energy Security and Net Zero (DESNZ) in collaboration with the Retail Energy Code Company (RECCo). Proposals for TI have been developed as part of the Smart Secure Electricity Systems (SSES) Programme. We are requesting views from industry and interested stakeholders on the design and implementation of the TI Arrangements.

As DESNZ are leading this consultation in collaboration with RECCo please note all responses will be shared between the two organisations.

Instructions

The consultation documents can be found on the REC Portal and contain the following annexes:

- Annex A: Introductory letter and list of questions
- Annex B: The Policy Overview of TI
- Annex C: Draft Electricity Supply Standard Licence Condition Changes
- Annex D: Draft REC Tariff Interoperability Arrangements Schedule
- Annex E: The API Technical Specification and associated EMDS changes
- Annex F: REC Standards Definition Document
- Annex G: Implementation Timeline

To respond to the consultation, we request that you review the annexes in conjunction with this proforma document. Please provide your responses to the



questions outlined below. Once complete, please email your response to:

SSES.Interoperability@energysecurity.gov.uk, and

tariffinteroperability@retailenergycode.co.uk.



Please complete the below information before submission

| | |
|---------------|----------------------------------------------------------------------------------------|
| Name | Jess Roper |
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| Organisation | Citizens Advice |

Please note: Information provided in response to this consultation, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes. Please see the consultation document for further information.

If you want information, including personal data, that you provide to be treated as confidential, please explain to us below why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we shall take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the department.

I want my response to be treated as confidential

Comments:

Citizens Advice is supportive of the policy principles driving this consultation. We have one concern related to non-domestic only suppliers which we have noted below in the appropriate question.



Questions on Annex C: Draft Electricity Supply Standard Licence Condition

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| Q1 | Do you agree with proposals for exemption / derogation (11C.3 / 11C.8)? |
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Response:

We disagree with the exemption proposed under 11C.3(c). We are concerned that setting the threshold at 100,000 meter points for non-domestic suppliers to make tariff data accessible to third parties, as proposed in this consultation, is too high and should be lowered. Based on an analysis of Citizens Advice Requests for Information from non-domestic suppliers, we estimate that 19.5% of small non-domestic consumers are served by suppliers with fewer than 100,000 electricity meter points. Given the importance of tariff interoperability for effective switching, we are concerned that the proposed threshold would exclude large numbers of small business and microbusiness consumers, limiting their ability to switch supplier or tariff and increasing the risk of being locked into products or services.

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| Q2 | Do you agree with the definition of bespoke charges (11C.9)? |
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Response:

Nil response



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| Q3 | Do you agree with the definition of relevant non-domestic premises (11C.9)? |
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Response:

Nil response

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| Q4 | Do you have any other comments on the proposed clauses of the new condition to be introduced into the Electricity Supply Standard Licence Conditions? |
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Response:

Citizens Advice is supportive of the policy intention driving the introduction of a new licence condition for suppliers of domestic and small non-domestic consumers. Interoperability and the accessibility of tariff data to third parties will help consumers achieve good outcomes when it comes to utilising flexibility offers.

Questions on Annex D: Draft Retail Energy Code Tariff Interoperability Arrangements Schedule

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| Q5 | Do you have any comments on the proposed REC TI Arrangements Schedule drafting (including the template User Agreement) and the proposed new TI related definitions that will be moved to REC Schedule 1 (Interpretations & Definitions)? |
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Response:

Nil response



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| Q6 | Considering the scope of the tariffs which are applicable under the Minimum Viable Product (MVP), we welcome views from Suppliers on the number of your existing tariffs which would fall outside the scope of the MVP, along with a rationale for why these would be excluded. |
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Response:

Nil response

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| Q7 | Do you agree with the proposed timeframes for issuing event notifications as set out in Paragraph 4.5 of the draft REC TI Arrangements Schedule? |
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Response:

Nil response

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| Q8 | Do you have any concerns with the proposed metrics included in the draft REC TI Arrangements Schedule in Annex D? These which are shown in square brackets, bold and red for ease of reference. |
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Response:

Nil response



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| Q9 | As set out in paragraph 1.14 of the draft REC TI Arrangements Schedule, our intention is that the User Register will be publicly available so that consumers can identify whether their current or prospective third-party service provider is registered. We seek views on whether the list of RTI Users, including identifier and organisation name, should remain publicly available or whether access should be limited to Energy Suppliers. Note that, access to RTI User Registration Data (e.g. webhooks and operational contact details) would be limited to Energy Suppliers. |
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Response:

The list of RTI Users should be publicly available to ensure consumers can, if they wish to, check if a third party is registered before they give consent to them accessing consumer-specific tariff data. Ofgem's Consumer Consent solution should give consumers the power to revoke or check which third parties have their consent to access this data but a publicly available resource would allow some protection against fraudulent actors ahead of that being implemented.

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| Q10 | Do you agree with our assumption that in the majority of instances TI Users could identify a consumer's correct Public Tariff Pricing Data if provided with their Tariff Name and Postcode? If not, please provide the additional data items that would be required and reasons why. |
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Response:

Nil response



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| Q11 | <p>Our assumption is that certain suppliers may have more complex tariff arrangements which mean that additional information (e.g. Meter type), beyond Tariff Name and Postcode, will be required for a TI User to determine a consumer's correct Public Tariff Pricing Data. We anticipate that it may be difficult for consumers to provide this additional information. Do you therefore agree that it is reasonable that consumers who have tariffs with these suppliers will only be able to optimise their ESA by providing consent to the RTI User to access their Consumer Specific Tariff information?</p> |
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Response:

Nil response



Questions on Annex E: Draft TI API Technical Specification and Energy Market Data Specification Changes

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| Q12 | Do you have any comments on the proposed Tariff Interoperability (TI) API Technical Specification? |
| Response: | Nil response |
| Q13 | Do you agree that the proposed changes to the Energy Market Data Specification (EMDS), detailed in the Data Item Catalogue and Market Messages Catalogue are all required for optimisation and in line with the MVP scope? |



Response:

Nil response

Questions on Annex F: Draft TI API Technical Specification and Energy Market Data Specification Changes

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| Q14 | Do you have any comments on the proposed redline changes to paragraphs 2.11 and 2.14 of the Standards Definition Document set out in Annex F? |
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Response:

Nil response

Questions on Annex G: Implementation Timeline



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| Q15 | Do you have any comments on the overall implementation approach and timeline set out in this annex, including the implementation date of 01 January 2027? |
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Response:

Nil response

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| Q16 | Do you have any comments on the high-level test approach set out in paragraphs 25-28? |
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Response:

Nil response



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| Q17 | Do you consider that an implementation working group should be established to support technical discussions on testing artefacts, defects and proposed design changes? If yes, please provide any additional information on the scope and membership of this group as well as when it should be established. |
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Response:

Nil response

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| Q18 | Please confirm if you would be interested in voluntary participation in end-to-end testing as either a Supplier or RTI User. While we have proposed an obligation on Suppliers to support implementation through end-to-end testing in the REC TI Arrangements Schedule (see paragraph 1.5(d) in Annex D), our preference is to work with a small number of volunteer Suppliers. |
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Response:

Nil response