

Energy UK response to Consumer Consent Impact Assessment

14th November 2025

Energy UK is the trade association for the energy industry with over 100 members - from established FTSE 100 companies right through to new, growing suppliers, generators and service providers across energy, transport, heat and technology.

Energy UK's members deliver nearly 80% of the UK's power generation and over 95% of the energy supply for 28 million UK homes and businesses. The sector invests £13bn annually and delivers nearly £30bn in gross value - on top of the nearly £100bn in economic activity through its supply chain and interaction with other sectors. The energy industry is key to delivering growth and plans to invest £100bn over the course of this decade in new energy sources.

The energy sector supports 700,000 jobs in every corner of the country. Energy UK plays a key role in ensuring we attract and retain a diverse workforce. In addition to the Young Energy Professionals Forum, which has over 2,000 members representing over 350 organisations, Energy UK is a founding member of TIDE, an industry-wide taskforce to tackle Inclusion and Diversity across energy.

As outlined in our earlier responses to the workstream, Energy UK supports a smart and secure electricity system that empowers customers to engage safely in activities, such as participating in data sharing and flexibility markets, whilst enabling room for innovation in the GB retail market. A customer consent system could help to support this objective.

Executive summary

Improving data flows and empowering customers to consent to how their data is used in the energy sector is strongly supported. However, members have noted some key concerns with the impact assessment which we don't feel have been adequately addressed.

Energy UK is particularly concerned that the Impact Assessment (IA) does not sufficiently evidence the expected outcomes, lacks clarity on assumptions, and underestimates implementation complexity across the industry. We share Ofgem's commitment to improving consumer control over data but believe the Consumer Consent Solution, as currently proposed in the IA, does not clearly evidence the benefits and how these will be achieved.

Energy UK would also prefer to see a broader strategy focused around interoperability between existing consent mechanisms, improved data sharing in the sector, and aligned with broader digitalisation initiatives – it's difficult to understand how they currently support each other. While Energy UK support the principles of the programme, we are concerned the implementation costs may be higher than anticipated and could impact customers, without building further trust in the energy system the solution is setting out to do.

If you have any questions about this response or wish to engage with Energy UK and its members, we would welcome further engagement.

Kind regards,
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Overview of concerns

Energy UK notes that the Impact Assessment would benefit from a more robust benefits case, with clearer evidence supporting the assumed positive outcomes. Currently, benefits are described primarily in qualitative terms. Without clear, numerical analysis of how the described benefits will be realised, it becomes difficult to compare them meaningfully against the projected costs of implementation.

Evidence base

- Energy UK note limited sensitivity analysis, particularly if there is low uptake for the solution.
- The timeline for realising benefits is not clearly articulated (i.e., when in future years will savings occur).
- Estimates for industry integration appear low, given the large number of companies that would need to connect with the solution.
- The IA does not clearly explain how the percentage weightings for cost comparisons are selected.
- The use of the 2019 smart metering IA for energy savings comparisons appears outdated, and not suitable for a solution in 2025.
- The projected £16–£20 million annual system cost savings attributed to enabling Flexibility Markets are not clearly explained on where the cost savings will come from.

Implementation risks

- Integration with existing data protection and privacy regulation, though implicitly acknowledged, should be explicitly assessed, particularly the costs of compliance and potential for consumer backlash if data-sharing mechanisms are misunderstood. This is a particular risk if suppliers need to input additional resource to resolve customer issues.
- Existing consent agreements should remain valid and be recognised within any new solution, aligned with GDPR and other legal requirements.
- Members have noted the difficulties in the solution during a change of tenancy. For example, if a customer gives their consent for the data associated with a specific MPAN but then moves out, then there is a gap in informing any parties external to the supplier.
- With multiple digitalisation initiatives underway, the CCS must remain agile to stay relevant. Interoperability with other regulatory and industry programmes should be prioritised to minimise duplication and cost (for example, tariff interoperability is going ahead with separate consent / authorisation mechanisms without the solution).
- Mechanisms to prevent “design lock-in” will be essential given the rapid evolution of digital and consent frameworks across the sector.
- Energy UK would appreciate further clarity on how these risks, [and risks previously outlined](#), can be addressed and resolved.

Consumer considerations

- Energy UK would urge solution design to enable high take-up. A communications strategy is likely needed to ensure this happens, particularly given the challenges around disengaged customers. The cost of this should be factored in, and the burden should not fall solely to suppliers to do so.
- The group is currently looking only at data sharing between SEC Other Users and their business customers, not the crucial data flows between the DCC and those users, meaning a big part of the picture is not included. Members have noted

concerns that optional participation will not give consumers a complete view of who has access to their data.

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