

## Energy UK response to [Tariff Interoperability Arrangements Consultation](#)

20<sup>th</sup> January 2026

### Executive Summary

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.

### Energy UK welcomes DESNZ and RECCO's continued work on the Tariff Interoperability Solution (TIS), and broader ongoing engagement with the Smart and Secure Electricity System (SSES) programme.

Across the SSES workstream, it's essential to ensure there is a holistic approach to the emerging regulation – not only focusing on suppliers, but ensuring a cross-sector approach to integrated, low carbon technologies and ensuring a level playing field across all market participants.

In response to this workstream, Energy UK is broadly supportive of the goals of the programme, and has outlined several key areas which need to be addressed to support its successful delivery below:

#### Non-domestic exemptions

Energy UK supports the non-domestic exemptions in recognition of the key differences between domestic and non-domestic markets.

However, Energy UK notes that only a small number of customers are on default contracts – but these tariffs are still in scope of the solution.

While the program correctly identifies that bespoke tariffs should be exempt, the requirement for a licensee to participate if they hold customers on default tariffs creates unintended participation of suppliers who only offer bespoke tariffs. Whilst these suppliers operate exclusively on a bespoke basis, they must maintain default tariffs for customers whose fixed-term contracts have expired. There is a risk that by including default tariffs suppliers will face a disproportionate regulatory burden serving a low amount of customers on these contracts – adding disproportionate costs to build the TI solution and ultimately passing the costs on to customers.

Energy UK would therefore recommend that the licence also stipulates an exception for a scenario where the only information a supplier would be required to be made available would be Deemed **and/or** Default contracts.

Whilst the derogation process would likely exclude these use cases, this is not guaranteed. To ensure suppliers are not unnecessarily building a solution to serve a small number of customers, exempting these contracts from the solution and providing clarity before the go-live date is needed.

Members have also suggested that Unmetered Supplies (UMS) be formally excluded. With the programme's core goal of enabling ESAs to respond to price signals, UMS infrastructure (for as assets like street lighting, traffic signals etc.) are critical public safety assets which are static and cannot respond to market signals in the same way as other assets. They are also not based on real-time half-hourly metering – so cannot respond in the same way as other assets.

### **Timeframes**

Members have raised concerns with the deliverability of the timeframes – including the length of time to deliver the solution, as well as the due date on a Bank Holiday (Jan 1<sup>st</sup> 2027). With a finalised technical specification due in October 2026, members have noted that there will be significant resourcing pressures in delivering the work to completion within the required timeframe of 3 months.

Energy UK requests a longer timeframe to implement the solution to reduce resourcing pressures and ensure the feasibility of the programme delivery.

### **User consent**

Members have noted the challenges in developing the consent solution – a more complex process to establish consent than is currently used by suppliers.

Members have also raised concerns around Ofgem's Consumer Consent Solution (CCS) being implemented separately, once the TIS has already been implemented, which will result in additional costs to suppliers to implement two separate consent solutions.

Energy UK would urge Ofgem and DESNZ to provide clarity on how, and when, Ofgem's consumer consent solution will be integrated with the TIS – including whether the CCS is used as a consent mechanism from the onset of the programme. As outlined above, DESNZ should be providing strategic oversight of how these programmes interact to ensure suppliers are not building short-term solutions – with these costs ultimately being passed onto consumer bills. This should be considered alongside the timeframe concerns outlined above.

### **Strategic oversight**

As outlined in Energy UK's response to the non-domestic smart meter rollout, Energy UK would highlight a wider industry concern that policy responsibilities are increasingly being shifted away from primary decision makers. RECCo's remit is centred on the technical operation of industry codes. Energy UK would urge DESNZ to maintain the core decision making responsibilities on approach, remit, and market oversight, and RECCo's role remains as designing the technical requirements.

### **Data Guidance**

Registered Tariff Interoperability (RTI) users should be following best practice guidelines, such as Ofgem Ethical AI Guidance, in anything they build around accessing the Tariff Interoperability framework or anything they do with the customer data. Whilst registered REC users (such as suppliers) will be adhering to existing guidance, RTI users won't necessarily be doing this. This is particularly important as the scheme expands beyond current SSES use cases, such as price comparison and auto-switching sites.

### **Radio Teleswitch Service (RTS)**

DESNZ and RECCo should explicitly consider the overlap with RTS, and provide clear advice as to whether smart/RTS time of use tariffs (which have peak/off-peak rates) are captured in scope of the proposals. Given the sensitivities with RTS, explicit reference to how this is handled is necessary.

### **Encouraging a voluntary approach**

Even where the rules don't require the tariff interoperability solution, a voluntary approach to the solution should be encouraged where it adds value. This approach would help to support good industry practice and help future-proof systems, while clearly recognising that such participation does not constitute a legal obligation.

### **Open market registry**

Energy UK would highlight that if an open market registry is taken forward, suppliers should be included to ensure customers can make clear decisions on which organisations can optimise their devices.

### **Consultation format**

Energy UK would highlight that the consultation is not in the most accessible format, making navigation challenging for some stakeholders. Given the documents' complexity, we would kindly suggest future publications are published in the standard accessible webpage format, and stakeholders are notified through the usual DESNZ channels.

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,

Louise Evans  
Policy Manager  
Louise.Evans@Energy-UK.org.uk