



14 November 2025

Charles Clark
Ofgem

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Consumer Consent Impact Assessment (IA) consultation

Dear Charles,

E.ON Next welcomes the opportunity to respond to the Consumer Consent Impact Assessment consultation. The draft impact assessment clearly sets out the policy objective to develop a single digital consent platform to empower consumers to share their data in a safe and secure way.

The draft Impact Assessment provides a robust, evidence-based, financial and qualitative assessment for implementing the Consumer Consent Solution via RECCo Ltd. RECCo is an established code body and has existing accreditation, performance assurance policies and processes in place to ensure that only credible parties will be able to access the consumer consent platform that have been set out clearly within the Governance working group sessions.

We are confident that RECCo will put the right level of protection in place for existing parties without making the process too cumbersome for new entrants to the market.

The analysis demonstrates a strong net economic benefit while simultaneously upholding Ofgem's consumer duties by ensuring the benefits are distributed progressively. We support the proposed impact assessment, policy direction and the detailed analysis underpinning it.

Our response to the consultation questions are detailed within appendix .1

Yours sincerely,

Cathy Mulliss
Regulatory Compliance Manager
E.ON Next

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Appendix 1

1. Do you agree that we have - to a reasonable degree - identified, understood, and described the potential costs and benefits of implementing the Consumer Consent Solution with RECCo Ltd delivering the Solution?

We agree and support the identification, understanding, and description of the potential impacts, particularly the hard-to-monetise effects.

While the project is still within the minimal marketable value proposition phase we agree that these costs should be recovered through RECCo's supplier invoicing process. Ongoing costs for this service should be developed further creating a "user pays" model to ensure that costs are spread evenly across the industry and companies who sign up to provide services to consumers contribute to ongoing costs and future development of the Consumer Consent Solution.

2. Do you agree that we have - to a reasonable degree - identified, understood, and described the potential impacts of implementing the Consumer Consent Solution with RECCo Ltd delivering the Solution?

We agree and support the identification, understanding, and description of the potential impacts, particularly the hard-to-monetise effects.

Smart Data Repository and Tariff Interoperability projects both require consumer consent for data to be accessed and will be delivered before the delivery date for the Consumer Consent Platform, which has now moved to Q1 of 2026. With this in mind, we would like to understand how Ofgem and RECCo are going to ensure that the Consumer Consent Platform is going to be aligned to its objective of consolidating consent for consumers.

3. Are there, in your view, any unintended economic consequences of implementing the Consumer Consent Solution with RECCo Ltd delivering the Solution which we have not identified?

We agree that the IA has comprehensively identified and addressed the material potential risks and consequences, and we do not see major unidentified economic consequences.

In order for the Consumer Consent platform to be successful a carefully planned engagement campaign should be put in place beforehand. This should focus on helping consumers better understand how the energy system operates and support flexibility enablers such as smart meters and how their data can be used to help with energy efficiency.

An independent, trusted, impartial, plain-English source of information on what flexibility, demand shift and demand turn up are, as well as the

benefits, will help consumers understand how energy saving can work for them.

4. Do you agree with our assumptions and proposed attribution rates for value accrued to the Consumer Consent Solution?

We agree and support the conservative assumptions and proposed attribution rates used throughout the analysis.