

By email only: CLFteam@energysecurity.gov.uk

19 September 2025

RECCo response to: Consumer led flexibility – proposals seeking views on the best approach to consumer engagement

We welcome the opportunity to respond to this consultation. Our non-confidential response represents the views of the Retail Energy Code Company Ltd (RECCo) and is based on our role as operator of the Retail Energy Code (REC). RECCo is a not-for-profit, corporate vehicle ensuring the proper, effective, and efficient implementation and ongoing management of the REC arrangements. We seek to promote trust, innovation and competition, whilst maintaining focus on positive consumer outcomes. We are committed to ensuring that RECCo is an “*intelligent customer*”, ensuring efficacy and value-for-money of the services we procure and manage on behalf of REC Parties, including those which constitute the REC Code Manager.

Against that backdrop—and drawing on our role as an “intelligent customer” for REC services—we view consumer engagement as core enabler to successful infrastructure development directly affecting consumers and not a discretionary add-on. It should therefore be assessed on effectiveness and value for money, which frames our view on the scale and prudence of investment set out below.

While consumer-awareness campaigns can look expensive in isolation—Smart Energy GB at ~£38m a year and the analogue-to-digital TV switchover averaging ~£29m a year for communications—the order of magnitude matters: a comparable CLF budget would be a small share of total energy-transition spending (networks, generation, flexibility platforms, smart devices, heat and transport). Crucially, well-designed, behaviourally informed engagement is the enabler that turns those capital investments into positive consumer outcomes—helping people understand the ask, opt in and invest with confidence, and sustain participation—so assets aren’t under-used and benefits to consumers are realised. In short, a proportionate, steady CLF engagement budget is prudent insurance against avoidable system friction—avoiding a shortfall “for want of a nail,” where a small, neglected input compromises much larger outcomes.

While we have responded to each of the consultation questions in the appendix attached, we would emphasise the following key points:

1. **Start sooner, scale sensibly:** Government should stand up an impartial and neutral Advice “front door” and light Standards/terminology function from 2026, with pilot, behaviourally informed Communications that hand off to Advice—then scale to multi-channel and place-based activity through 2027–28. This creates market pull, irons out issues early, and avoids compressing delivery against a late deadline.
2. **Keep CLF governance light and funding efficient:** Begin broadly aligned to government objectives but allow the framework to set priorities by evidence over time, reflecting Distribution System Operator (DSO)/ Local Area Energy Plan (LAEP) signals and consumer voice. Consider use of existing code / licence-based levy mechanisms for simple, transparent cost recovery. As Time of Use Tariffs (ToUT) and flexibility scale, Ofgem should consider a Financial Conduct Authority (FCA)-style Consumer Duty for suppliers and flexibility providers to ensure good outcomes across all segments. While we recognise the intent that CLF arrangements enable new market entry and operate independently of incumbents or changes to existing supplier operating models, CLF from a consumer

perspective is likely to be perceived as an integral part of the retail energy market. Positioning CLF as an adjacent, standalone market risks confusion and potentially confining participation to a niche or being unlikely to secure the mass-market uptake envisaged in the code roadmap. Accordingly, governance should explicitly manage interdependencies and either (i) enable bundled propositions that combine supply and demand management, or (ii) where services are provided separately, guarantee interoperable data/consent access and portability, and prohibit tying/exclusivity that could stifle innovation or cause consumer harm.

3. **Make engagement the enabler of change:** A proportionate, but committed and dependable CLF engagement budget is essential to ensure that the significant investment in networks, smart meters and market reforms converts into mass adoption, effective participation and real consumer benefit. RECCo stands ready to support delivery to ensure that consumers benefit and are protected.

We are happy to discuss any of the points raised in this response.

Yours sincerely,

Jon Dixon
Director, Strategy and Development

Appendix - RECCo response to consultation questions

Q1: Do you agree that government should be exploring how to achieve a more joined up and holistic approach to consumer engagement on CLF? Please provide supporting commentary.

Yes. A joined-up, holistic approach to consumer engagement on CLF is necessary. Successful implementation of CLF to meet government targets requires significant numbers of mass market consumers to accept, adopt and invest in unfamiliar, potentially complex and relatively expensive new technologies (e.g. air source heat pumps, batteries and electric vehicles (EVs)) which consumers will generally be required to fund themselves, as well as to change and sustain their behaviours and interaction with the retail energy (e.g., ability to harness time of use tariffs). The size and scale of this change in technological and behavioural change cannot be underestimated, particularly when trust in the new solutions, existing suppliers and potentially new service providers needs to be established and maintained for the long term.

Why the CLF is needed

- **Clear evidence of barriers:** The consultation provides evidence of multiple engagement barriers such as jargon-heavy terminology, inconsistent explanations of offers, unclear benefits/returns, and low general awareness—especially for SMEs and many domestic consumers. Without coordination, these issues risk increasing confusion and depressing uptake. Consumer journeys for the adoption of CLF needs to be the foundation upon which any engagement is built, this must be designed to engender trust, simply decision-making, provide convenience and ensure that financial returns and payback are achievable within understandable timeframes.
- **Risk of consumer harm:** The government has rightly framed the “do-nothing” (purely market-led) counterfactual as a patchwork of siloed activity with rising risks of misinformation, exclusion, and consumer detriment; a coordinated framework is therefore worth testing against the status quo.
- **Lessons learnt:** Precedent from smart metering shows that national, consistent engagement helps. Smart Energy GB was created as a single, legally-defined body to drive awareness and behaviour change alongside supplier activity—an approach that clarifies roles and concentrates expertise.
- **Equity and inclusion:** Evidence from the NAO shows engagement gaps by segment (e.g., private renters, younger consumers), underlining the value of targeted, coordinated outreach to avoid leaving groups behind.
- **Investor confidence & market stability:** A visible, long-term consumer-engagement framework signals that households and SMEs will be supported to understand, consent and participate, giving innovators, aggregators, device manufacturers and suppliers the demand confidence to invest, scale and standardise offers. This reduces go-to-market risk and customer-acquisition costs, crowds-in private capital, and helps avoid a fragmented, stop-start rollout.

What a joined-up approach should include

- **Coordination (industry-facing):** A designated function to map the CLF offer landscape, align common language for different product types, and provide a trusted, up-to-date view of the market so consumers see consistency across providers.
- **Standards:** Proportionate engagement standards (codes/guidance) that keep pace with CLF evolution and complement Ofgem/DESNZ’s regulatory protections (including the new load-control/Flexibility Service Provider licensing).
- **Advice (consumer-facing):** A trusted, neutral and impartial source for explaining CLF solutions, routes to participate, data/consent and expected returns—without duplicating providers’ service roles.

- **Communications:** Targeted national campaigns that link CLF to wider outcomes (e.g., bill savings, net zero), with specific strategies for harder-to-reach groups.

How to implement (principles)

- **Build on existing capacity, not new bureaucracy:** The consultation’s “framework” can be delivered by existing entities/partnerships; funding/governance should be proportionate and consulted on.
- **Consistency with competition/innovation:** Common language and baseline standards should coexist with provider-led innovation in offers and channels.
- **Evidence-led targeting:** Use segmentation and outcomes tracking (mirroring the smart-meter “activation funnel” discipline¹) to focus effort where it moves participation most.

Conclusion: Given the documented risks of fragmentation and low awareness—and the positive precedent from smart metering—government should explore a coordinated CLF engagement framework spanning Coordination, Standards, Advice and Communications, delivered through existing actors under clear, proportionate governance.

Q2: The following functions are presented as desirable for an effective consumer engagement framework to have in scope. Do you agree that some or all of these functions should feature in such a framework? Please provide supporting commentary.

- Coordination
- Standards
- Advice
- Communications

Yes, all four.

Coordination: Needed to avoid a patchwork of siloed messages, inconsistent language and rising confusion as CLF scales. The consultation proposes a designated function that maps offers, tracks trends and provides a trusted, up-to-date view of the CLF market, precisely to counter fragmentation. Smart-meter rollout lessons also show value in convening forums to share good practice on engagement.²

Standards: A light-touch but active “standards” function supports consistent, trustworthy engagement, spots gaps as the market evolves (e.g., unclear terminology), and signposts fixes via industry/government fora—without becoming a new regulator. Plain-English guidance and horizon-scanning are explicitly envisaged. While regulation and standards can be light touch, there must be a clear duty of care by any technology or service provider to adopt a positive consumer outcome/no consumer detriment principle. We expand upon this further in Q14.

Advice: An impartial, independent, and trusted source of advice that explains CLF offers, routes to participate, redress, and (at higher intervention) tailored recommendations and expected returns/payback, delivered via web and assisted channels/partnerships, is set out as the minimum viable advice “product” with scalable options. This responds directly to barriers of jargon, low awareness and poor comparability.

Communications: Proactive, targeted amplification (compatible with net-zero campaigns) is necessary alongside “on-demand” advice, to raise awareness, connect CLF to broader benefits and reach harder-to-engage groups. The consultation describes scalable options from embedding CLF in wider campaigns to segmented, insight-led activity. Smart Energy GB provides precedent for national, insight-led campaigns with targeted partnerships and community advice capacity.

¹ [“Written evidence submitted by Smart Energy GB \(SMB03\)”](#)

² [“Update on the rollout of smart meters”](#) National Audit Office report, June 2023

Conclusion: The four functions work as a package that addresses documented risks of fragmentation and low awareness while protecting competition, innovation and ensuring positive consumer outcomes. We therefore agree they should all feature within the framework.

Q3: Would you propose additional or alternative functions? If so, please state your reasoning.

Yes. In addition to Coordination, Standards, Advice and Communications, we propose the following functions to make the framework more outcome-focused, equitable and evidence-led:

Market Insight & Measurement: Establish shared KPIs (awareness, activation, retention), segment audiences, and publish a rolling dashboard of CLF uptake and campaign effectiveness. This ensures activities directly target the consultation's identified barriers (low awareness, complexity) and track whether interventions lift participation over time.

Plain-Language & Terminology Stewardship: Maintain a living, cross-industry glossary and style guide for CLF product types, data/consent and consumer promises. This tackles jargon and inconsistent explanations that currently depress engagement.

Independent Offer Comparison & Signposting: Provide a provider-agnostic comparison aide (standardised disclosures on eligibility, equipment, typical bill impact ranges, data/consent, exit terms), with signposting to redress bodies. This improves comparability and informed choice where offers are diverse and hard to compare.

Inclusion & Vulnerability Outreach: Partner with trusted local/intermediary organisations to deliver accessible formats and assisted channels for low-income, digitally excluded and other vulnerable consumers. This mitigates the risk that current, organic approaches leave these groups behind.

Consent & Data-Literacy Enablement: Provide consumer-tested consent templates and explainer journeys for smart-meter half-hourly data and automated control (as part of the Smart Secure Electricity Systems programme (SSES)). Clear, trusted guidance on protections supports uptake where sharing data and automation are prerequisites.

Behavioural Trials Hub: A central capability to design/run A/B tests and Random Control Trials (RCTs) on messages, channels, incentives and defaults, sharing learnings across industry. This makes the framework adaptive and evidence based as CLF evolves.

Local Activation Partnerships: A light framework for co-branded, place-based activation with local authorities, Distribution System Operators (DSOs) and community groups to reach consumers where potential is highest. This complements national activity with targeted relevance and addresses participation gaps.

Engagement Assurance / Trustmark (light-touch): A voluntary kitemark against plain-English standards, with periodic sampling and mystery-shopper checks. This reinforces trust and consistency without creating a new regulator.

Incident & Scarcity Communications Protocol: Pre-agreed templates and roles for coordinated consumer messaging during tight system periods (e.g., Demand Flexibility Service-style events), ensuring clarity of asks and post-event feedback. This addresses the consultation's call for a joined-up approach that avoids fragmentation and confusion.

Conclusion: The consultation invites views on alternative scope components, envisages delivery by existing entities/partnerships rather than a new body, and stresses compatibility with competition and innovation—these proposals align with that intent while directly attacking the documented barriers to CLF participation.

Q4: Would you propose a particular combination of functions and degrees of intervention for those functions? Please provide supporting commentary.

RECCo is generally agnostic on which specific organisation(s) carry out the activities and how they are institutionally combined. We agree with the consultation's premise that a framework can be delivered by existing entities or partnerships under proportionate governance with links to government and Ofgem. Our emphasis is therefore on how the functions interlock and the natural synergies that support consumer-led flexibility outcomes.

Recommended combination

Coordination & Standards (industry-facing) as a paired core: Coordinating a shared, plain-English view of the CLF market and maintaining visibility of gaps in engagement standards are mutually reinforcing. A single coordinating view reduces fragmentation, while a light standards function and no consumer detriment principle provides the common baseline that can maintain trust as the market evolves. Degrees of intervention can be medium initially (occasional industry forum; horizon-scanning and notification of gaps), with the option to scale to high as evidence justifies.

Advice & Communications (consumer-facing) as twin channels: Impartial Advice available "on demand" (minimum viable: a trusted website; scalable to assisted channels) should run in tandem with targeted Communications that proactively raise awareness and prompt participation. This pairing balances always-available guidance with segmented outreach, avoiding over-reliance on provider marketing.

Other potential synergies

Shared market insight across all functions: Coordination should maintain a live map of offers, segments and trends to feed Advice content and target Communications, while informing where Standards need attention. This responds directly to the consultation's fragmentation and clarity risks.

Governance links to Ofgem and government: Proportionate oversight ensures consistency with wider policy (e.g., Clean Flexibility Roadmap) and provides a channel to notify gaps in the standards landscape that sit beyond consumer engagement alone.

Behavioural insights embedded in Communications (and tested via Advice journeys): The consultation explicitly envisages using behavioural science insights for content development and effectiveness monitoring. We recommend involvement from Ofgem and the UK Government's Behavioural Insights Team (a.k.a. "the nudge unit") in designing and evaluating messaging and journeys.

Q5: To what extent do you believe that the functions presented at Q2, and any other functions as per Q3, can be provided via current arrangements? Please state your reasoning.

Current arrangements provide some of the needed activity, but not a complete, consistent framework. Without light coordination and an impartial "front door," the consultation itself flags rising risks of fragmentation, jargon and low awareness as CLF scales.

What's already in place (and the gaps)

Coordination (industry-facing): Today's picture is a patchwork of supplier/aggregator initiatives, trade associations and ad-hoc fora. The consultation explicitly cautions that a purely market-led model could become siloed and confusing over time. We therefore see no single actor currently providing the proposed "trusted source of market overview" role.

Standards (engagement baselines): Ofgem/DESNZ measures (e.g., load-control/FSP licensing under SSES) will raise protections, but the consultation envisages an ongoing, plain-English standards “translator” that can spot and notify gaps as CLF evolves—*without* becoming a regulator. That specific function does not exist today.

Advice (consumer-facing): While many parties publish material about time-of-use tariffs or device control, the consultation notes “there is no organisation currently providing such advice to the broad range of consumer types on CLF.” We agree an impartial, trusted source—web first, with scalable assisted channels/partnerships—would fill a real gap.

Communications (consumer-facing): There is strong campaign capability in the market (including smart-meter communications), but CLF messaging today is dispersed. The consultation proposes CLF-specific communications that are compatible with wider government campaigns and use behavioural science to target and measure impact—this is partially provided today, not systematically.

Smart Energy GB (SEGB) has led campaigns and partner activation around smart metering; the consultation itself references smart-meter deployment and points to SEGB as the public information hub for that programme.

However, CLF is broader, more complex and requires consumer investment decision-making more akin to financial services (covering investment decisions, technology (and device ecosystem selection), consent, automation, tariffs, and ongoing participation, etc.) than smart metering (where the technology selection, investment decision and financing is determined by the supplier). We therefore see SEGB as a potential delivery partner—especially on communications craft and channel reach—but recommend that consideration be given to a fresh public “interface” for CLF that can combine Communications *and* Advice under one impartial, neutral, and provider-agnostic front door (with clear signposting to redress bodies). This combined interface is consistent with the consultation’s modular design (Advice & Communications as consumer-facing functions) and would reduce hand-offs and increase convenience for consumers. If consideration is to be given to extending the SEGB role, we consider that this should be subject to a thorough and independent analysis including stakeholder feedback and cost-benefit analysis.

Role for Ofgem/government and behavioural insights: We support proportionate governance links to Ofgem/government, in line with the consultation’s illustrative framework. For content design and evaluation, as noted in response to Q4 we recommend involving Ofgem and the government’s Behavioural Insights Team so that messaging and consumer journeys are behaviourally informed and iterated. The consultation explicitly envisages drawing on behavioural science at medium/high intervention levels for Communications.

The role of Citizens Advice and consumer representatives: CLF engagement should champion consumer interests, especially for lower-income, digitally excluded and SME segments. The Advice function explicitly contemplates partnerships with consumer bodies and charities at medium/high intervention; we support formalising Citizens Advice and other consumer representatives as partners in both Advice (assisted channels) and targeted Communications.

Conclusion: Some activity can continue under current arrangements (e.g., provider-led outreach and SEGB-style campaign delivery). However, critical gaps remain: a neutral market overview (Coordination), an ongoing plain-English standards “translator”/gap-spotter (Standards), and a single, impartial front door that integrates Advice and Communications for consumers. We therefore recommend leveraging existing organisations within light, outcomes-based governance, with Ofgem/government focused on oversight and transparency and the Behavioural Insights Team supporting design and evaluation and the creation of a fresh CLF consumer interface that brings Advice & Communications together and partners with Citizens Advice and other consumer

representatives. This approach is consistent with our Q4 “twin-channels” model and the consultation’s aim to avoid a new standalone body while delivering a joined-up, holistic outcome.

Q6: How important is a role for coordination of industry for consumer engagement on CLF? Please state your views on how such coordination could be best achieved.

We consider that a light-touch but purposeful coordinating role is important. Comparable UK programmes show that when many actors must reach diverse audiences with evolving propositions, a neutral umbrella and a single public “front door” (combining Advice and Communications) can improve clarity, reach and trust—while leaving delivery competition intact. We also see value in Ofgem/government sponsorship of behavioural science, drawing on the experience of the government’s Behavioural Insights Team, to design and evaluate messages before scaling.

Lessons for CLF from comparable programmes

Smart meter rollout (Smart Energy GB): Government has recorded that ~50% of smart meter installations are attributable to Smart Energy GB’s activity, evidencing the impact of a national, insight-led campaign working alongside supplier delivery.³ The potential lesson for CLF is that an impartial and neutral, national platform can materially lift uptake when it sets a common narrative and shares toolkits/insight. We would also suggest building in test-and-learn and value-for-money checks from the outset; pair communications with a public advice route so consumers aren’t handed off. As noted above, while SEGB may be able to act as a delivery partner for campaigns, we consider that CLF merits a fresh consumer interface that combines Advice and Communications given its wider scope than smart metering.

Radio Tele-Switch (RTS) meter replacement: Ofgem and DESNZ have had to step in to manage a phased, location-based transition to protect consumers as timelines for the switch-off of radio signals shifted several times. The lessons here are that when programmes are place and time-dependent, coordination should align suppliers/DSOs on shared scripts, timing windows and escalation paths, particularly for vulnerable customers, with clear, consistent public messaging from a neutral “front door.”

Digital TV switchover (analogue to digital): Delivery was coordinated by Digital UK under government/Ofcom policy, achieving near-universal transition with a single brand, consistent language (“retune/switch”) and a Help Scheme for assisted journeys.⁴ Some of the lessons for CLF include the use of plain, repeated language, a simple “what to do/when” cadence, and fund assisted channels for those who need help. These principles that map directly to flexibility asks (e.g., tariff changes, enabling automation).

Open Banking adoption: The CMA created the Open Banking Implementation Entity (OBIE) to drive standards and delivery, and its lessons-learned review highlights the value of a central implementation entity and clear governance to build trust. Independent work also underlines that consumer trust, security and transparent consent are decisive for uptake.⁵ Lessons for CLF include the pairing coordination with standards clarity and data/consent literacy materials; making consent flows transparent and repeatable; and the use of behavioural testing (with Ofgem/Behavioural Insights Team) to optimise framing and defaults.

Conclusion: Coordination should provide the impartial and neutral umbrella and single front door consumers recognise, align timing and language across industry, and integrate behavioural science via Ofgem/Behavioural

³ [“Treasury Minutes: Government response to the Committee of Public Accounts on the seventy-second to seventy-ninth reports from session 2022-23”](#), January 2024, paragraph 1.3

⁴ [“The UK’s switch to digital TV”](#), Alex Pumfrey, June 2017

⁵ [“Open Banking Lessons Learnt Review”](#), CMA, May 2022

Insights Team. This model should build upon what worked in SEGB-backed smart metering, RTS migration, Digital TV switchover, and Open Banking—and be proportionate to CLF’s multi-actor, evolving nature.

Q7: What would be the appropriate approach for a framework to ensure appropriate standards on consumer engagement for CLF are in place?

We support a light-touch but active “Standards” function that:

- (i) translates existing and incoming rules into plain-English guidance,
- (ii) spots and notifies gaps as CLF evolves, and
- (iii) supports industry to bring forward fixes via existing fora—without becoming a new regulator.

This aligns with the consultation’s design and preserves space for competition and innovation. consumer-led-flexibility-engage.

What the Standards function should do

Translate & explain (“plain English”): maintain an up-to-date view of current, incoming and future standards relevant to CLF and explain them in accessible language for all actors (suppliers, aggregators, installers, community groups).

Horizon-scan & gap-spot: Take a holistic view to identify gaps as the market matures—e.g., coverage of certain CLF organisations, vulnerable segments, or the need to standardise CLF language and terminology—and notify government/Ofgem through governance routes.

Convene to solve: Where gaps relate to consumer engagement, surface them at the industry forum and support development of solutions with stakeholders (industry, consumer bodies, Ofgem/government).

Stay non-regulatory: Whilst the CLF role should focus on information and coordination, not enforcement there may be some touchpoints between the two. In a direct sense, any new CLF measures should avoid limiting competition or innovation or creating barriers to entry. However, there may also be a role for the Standards function to spot and flag any supply-side terms or technical rules that foreclose CLF participation (e.g., non-portable consents, closed APIs, discriminatory baselines) and identify route fixes – whether via existing fora or more formal referral - without itself becoming a regulator.

- Q8:**
- a) To what extent should the Advice function focus on being a trusted, neutral source of information to engage consumers on CLF?**
- b) To what extent should it go to in providing support to individual consumers as a service?**

(a) Advice function — preferred delivery model

We consider that the Advice function should be delivered by an impartial trusted central provider acting as a single source of truth on CLF: plain-English explanations of the types of technology, offerings, how to access them, answers to common questions, and clear signposting to redress rather than case-handling. As the consultation sets out, the minimum viable offer is a website, scalable to multi-channel support (e.g., a phone line and assisted journeys) and delivered in partnership with consumer bodies and charities where appropriate.

At the same time, materials produced by the central provider should be open for reuse—with proper attribution—by third parties such as media outlets, consumer representatives, local partners and money advisers, so that trusted intermediaries can carry consistent messages into their channels. That reuse model

mirrors RECCo's experience with public-interest campaigns, notably the Stay Energy Safe work we funded in collaboration with Crimestoppers, where centrally produced, evidence-based content was made available for any honest, safety-focused use to raise awareness of energy theft and meter tampering. The Advice function should be designed alongside Communications (so consumers aren't handed off between sites) and kept agnostic of particular providers.

(b) Relationship to third-party services and intermediaries

We see clear space in the market for an impartial, neutral, advisory-only service that sits alongside (not in place of) third-party intermediaries (TPIs). That complements our broader rationale for extending governance attention to TPIs, who are increasingly active in promoting flexibility offers and services as well as traditional broking, while ensuring for-profit channels are not the only route to consumer support. In practice, this means:

- (i) maintaining an impartial central advice "front door" that any consumer can use without commercial pressure;
- (ii) enabling TPIs and other partners to reuse the central materials in line with plain-language and accuracy standards; and
- (iii) providing assisted options through charities and advice agencies for those who need them.

This is consistent with the consultation's Advice model (multi-channel, partner-enabled) and its neutral, complementary role alongside market communications.

Q9:

a) To what extent should the framework focus on proactive, targeted communication activity directly to consumers on CLF, to supplement the approach to Advice, which would be available "on demand"?

b) To what extent should the framework focus on national or more targeted communications? If the latter, what consumer segments should be targeted and why?

Proactive, targeted communications to supplement on-demand Advice

Yes, we support a proactive, targeted programme that creates attention and moves consumers through an AIDA journey: Awareness, Interest, Desire/Decision, Action, with the Advice function as the trusted "next step" for tailored guidance. The designated organisation should amplify CLF with insight-led, behaviourally informed content, then hand off seamlessly to Advice so households can check what's right for them (assets, circumstances, eligibility, and ability to shift demand). This mirrors the consultation's model of proactive communications that complement on-demand Advice, with segmentation and behavioural testing to design and evaluate content.

To protect consumers and sustain confidence, the central interface should verify key claims made in or alongside government campaigns (e.g., by device manufacturers or suppliers) and present agnostic, plain-language explanations with consistent terminology. Where offers are promoted, the Advice "front door" should help consumers test "is this suitable for me?" before committing.

Trust would be strengthened if suppliers were subject to an explicit FCA-style Consumer Duty upon both energy suppliers and flexibility providers – ensuring positive consumer outcomes / no consumer detriment—aligning marketing with outcomes and ensuring suitability, clarity, and fair value akin to financial services. This complements, rather than replaces, the framework's neutrality and standards functions.

National versus targeted communications

Begin with a national focus—a single, recognisable narrative compatible with wider government campaigns—then evolve toward targeted, place-based activity as evidence accumulates. Regional targeting will grow in importance as DSOs take a more active role and local conditions diverge. For example, Southeast England may realise higher value from flexibility to manage transmission/distribution constraints, while consumers in Scotland may face different drivers; both contribute to overall system efficiency. The framework should enable timed local bursts (e.g., when flexibility zones or services go live) while retaining the national brand and standards so messages remain consistent and impartial.

Q10:

- a) What considerations should there be for assessing the cost of establishing and running a framework?**
b) Do you have views on potential funding mechanisms that may be considered for such a framework?

Cost considerations

A proportionate cost assessment for CLF should: (i) define set-up and run costs by function and intervention level; (ii) reuse existing delivery capacity wherever possible; (iii) budget explicitly for assisted channels, regional bursts, and claim verification; and (iv) hard-wire evaluation so spend follows proven impact. The experience of smart meters, digital TV switchover, RTS migration and Open Banking all point to the same conclusion: modest, sustained investment in clear Advice, disciplined Communications and simple governance saves money overall—by avoiding late fixes, protecting consumers, and converting system investment into real-world participation.

Funding mechanisms

We should recognise that whatever funding route is chosen, costs will ultimately be passed through to energy consumers. The most practical model is likely a levy on relevant licensees, mirroring smart metering: SEGB is funded by GB gas and electricity suppliers under licence conditions, which require them to establish, support and monitor a central consumer-engagement body and contribute to an agreed annual budget (domestic and non-domestic). Funding CLF via upstream licensees (e.g., transmission/distribution) would still flow through to suppliers—and then to consumers—adding transaction costs and reducing transparency.

Requiring new, non-traditional flexibility participants to contribute from day one may feel equitable but risks administrative complexity and barriers to entry. A balanced approach is to start with existing industry code mechanisms for cost recovery—providing transparency, auditability and familiar oversight—while retaining the ability to pass through clear, efficient and predictable charges to new service providers when it would be inequitable not to do so.

To give incumbents regulatory certainty, government should make an early, in-principle commitment to evolve the funding base. For example, signal now that—by a set date (e.g., 2027/28) or when the market crosses objective thresholds (e.g., number of enrolled consumers, volume of contracted flexibility, ToUT penetration)—non-traditional participants will begin contributing on a proportionate basis, with details finalised through consultation. Clear triggers and a lead-in period de-risk planning for all parties while preserving simplicity at launch.

Q11:

- a) Do you agree that core governance arrangements should include an expectation that the framework operates broadly in line with government objectives for CLF?**
b) To what extent (very involved, somewhat involved, not involved) should government be in ongoing monitoring and stewardship of the consumer engagement framework?

We agree that CLF should initially operate broadly in line with government objectives, to ensure coherence with wider energy policy and early campaign compatibility. However, the framework should have a mandate to set its

own priorities over time, informed by evidence and the evolving system context—particularly the growing roles of DSOs, Local Area Energy Plans (LAEPs), and consumer groups.

Early alignment reduces duplication and messaging noise, but needs can outpace policy cycles. Demand, technologies, local constraints and consumer behaviours will shift unevenly across GB; a framework that can re-weight effort toward what works (and where it’s needed) will deliver better value and outcomes.

Government/Ofgem role: We support monitoring and accountability, not operational stewardship. Government and Ofgem should set high-level outcomes, require transparent KPIs and reporting, and review value-for-money and consumer protection. They should not micro-steer day-to-day activity, recognising that policy may occasionally lag emerging needs and that the framework must be able to pivot.

Adjacent but interdependent markets: As CLF/flexibility scales, it will sit adjacent to—yet distinct from—retail energy supply. We therefore recommend that governance explicitly address interdependencies so arrangements in one market do not stifle innovation or competition, or cause consumer harm, in the other. In practice: guard against leveraging/tying (e.g., making CLF participation contingent on a specific supply contract); ensure interoperable access to data and consent journeys; require portability and non-discrimination in device onboarding/telemetry/baselines; and monitor exclusivity that could raise rivals’ costs. KPIs and competition assessments should be separate for each market, with ex-ante conduct principles to protect consumer choice and switching.

Q12:

a) Do you agree with an aim to establish the framework before the end of 2028?

b) If you do not agree, please indicate your preferred timeframe, including rationale for how this would be achieved?

No. We support earlier establishment and on a staged basis. The consultation itself highlights a need to at least quadruple CLF capacity by 2030, which argues for consumer engagement to be in-market well before 2028 so awareness, trust and habits can bed in ahead of that milestone. The paper also shows that a minimum viable Advice offer is simply a dedicated website—a deliverable that does not require every component to be finalised and can scale later to assisted channels. In parallel, the proposed Communications role is conceived as a proactive complement to Advice, drawing on behavioural insight and evolving over time. This can also start early, then be iterated.

Given that government intends to publish a response by early 2026, there is a clear opportunity to: (i) stand up the Advice MVP and a light standards/terminology “translator” in 2026 with an explicit requirement to consider different consumer adoption journeys (the adoption and decision-making by a cash-rich detached home owner will be different to that of an indebted renter living in social housing), (ii) run pilot, insight-led communications through 2026–27, and (iii) scale to multi-channel Advice and broader campaigns during 2027–28. This approach establishes ways of working early, irons out teething issues, and creates market pull—rather than waiting to compress delivery against a late, fixed deadline.

We also note that significant building blocks already exist, i.e., there are millions of smart meters are in place; time-of-use and flexibility products are on offer; and the consultation’s own design is modular, enabling evidence-in scaling rather than “big bang” launch.

We suggest a phased timeline starting in 2026:

2026 (Phase 1): Launch Advice Minimum Viable Product (website, plain-English content, redress signposting) and a light Standards/terminology function with exploration of consumer journeys; begin targeted pilot communications that hand off to Advice; publish initial KPIs.

2027 (Phase 2): Expand to multi-channel Advice with partner-assisted routes; scale segmented communications using behavioural testing; introduce claim verification for offers promoted alongside public messaging; opportunity to tie in with launch of **Consumer Consent platform**.

2028 (Phase 3): Broaden reach and deepen assurance, keeping the framework adaptive as CLF matures; continue measurement and reweight spend to what works.

This plan aligns with the consultation's degrees of intervention model, leverages the stated 2026 government response as a trigger point, and maximises the time available to build participation toward 2030. It avoids the risk of waiting until 2028 to start core activities that could, and should, begin sooner.

Q13: Considering different consumer groups across the range of domestic and non-domestic consumers, does there need to be a different approach considered for some or all of these? Please explain for which consumer groups and why.

Yes, we consider that there needs to be a tailored approach and that a one-size-fits all alternative is unlikely to be effective. The framework should as a minimum segment audiences and tailor engagement across domestic archetypes, non-domestic customers, and regional conditions, with clear links into the Advice and Communications functions as below:

Domestic segmentation (archetypes + digital maturity): Build on Ofgem's household archetypes but go further than socio-economics: segment by digital maturity and channel preference (self-serve vs assisted), housing tenure, device ownership/eligibility, and comfort with data/automation. This lets Advice meet people "where they are" and Communications use the right channels and framings.

Non-domestic segmentation (micro/SME to large I&C): Create distinct journeys and materials for micro/SME (time-poor, needing simple "is this right for me?" checks and ready-made playbooks) versus larger I&C users (with metering/controls and commercial drivers that support deeper participation). Keep domestic and non-domestic content clearly separate.

Regional calibration: Adopt a national brand and standards, with the ability to run timed, place-based bursts as local needs diverge and DSOs play a greater role—for example, higher flexibility value to manage constraints in parts of the South East versus different drivers in Scotland—while keeping language and protections consistent.

Q14: Please provide any additional feedback here.

We support the intent to scale consumer-led flexibility (CLF) and recommend starting core engagement functions sooner than 2028 so that awareness, trust and participation can build ahead of the major 2030 milestones. In our view, a phased start from 2026—standing up a minimum-viable Advice front door and a light standards/terminology translator, with pilot communications—would de-risk delivery and create market pull before later scaling. This is consistent with the consultation's modular design and with our wider responses.

As government, Ofgem and NESO progress the Clean Flexibility Roadmap, we encourage clear role-definition across existing bodies so consumer-facing enablers are not orphaned. The evolving market architecture gives Elexon central roles (Flexibility Market Facilitator and provider of the Flexibility Market Asset Register), while also identifying REC-centred enablers such as tariff interoperability and the Consumer Consent/Smart Data workstreams—areas where RECCo can add distinctive value by providing a neutral, trusted, consumer-facing

layer that complements system-level delivery. We would in due course welcome explicit recognition of how these elements interlock, with simple hand-offs and shared KPIs.

Linked to that, Ofgem has asked RECCo to deliver a digital Consumer Consent Service to give customers an easy, consistent way to grant and revoke data access—foundational for CLF offers that rely on half-hourly data and device control. We suggest treating this as the “single version of the truth” for consent journeys across CLF, embedded in the Advice front door and reused by market actors under common plain-English standards.

On governance and value for money, we favour proportionate oversight from government/Ofgem—clear outcomes, transparent reporting and independent evaluation—without day-to-day stewardship. Behavioural insights should be hard-wired (including input from the UK Government’s Behavioural Insights Team) and results openly shared to direct spend to what works. Communications should follow an AIDA discipline and hand off seamlessly to Advice; Advice should verify key claims made alongside public campaigns and help consumers test suitability before committing. Where suppliers promote offers in tandem with public campaigns, an explicit consumer duty (akin to financial services) would strengthen trust and outcomes.

We would recommend using existing code-based mechanisms for any levy-funded cost recovery to keep pass-through efficient and transparent, and to provide familiar stakeholder oversight—while ensuring not-for-profit, purely advisory channels remain available alongside commercial intermediaries.

Finally, while Ofgem has strengthened supplier standards (e.g., contractability, support for customers in payment difficulty, and expectations around identifying and assisting vulnerable consumers), these measures fall short of an FCA-style Consumer Duty. As time-of-use tariffs and flexibility propositions expand, more consumers will be directly exposed to peak price signals; some—without feasible ability to shift usage or access enabling assets—may risk higher costs without commensurate benefits. We therefore urge Ofgem to consider and consult upon a cross-cutting Consumer Duty for both energy suppliers and flexibility providers, focused on good outcomes by segment, clear and timely communications, suitability and fair value, and monitoring/remediation of harms. This would reinforce the engagement framework and build durable trust in CLF as participation grows.