

Consultation

Heat networks regulation: fair pricing protection guidance

Publication date: 29/09/2025

Response deadline: 27 / 10 /2025

Team: Heat networks

Email: HeatNetworksRegulation@ofgem.gov.uk

We are consulting on a fair pricing and cost allocation guidance framework for heat networks. This builds on our joint consultation with the Department for Energy Security and Net Zero (DESNZ) on [implementing heat networks regulations for consumer protection](#) (2024 implementing consumer protections consultation) and our recent [fair pricing protections consultation](#) (April 2025 consultation).

We would like views from people with an interest in heat networks and particularly welcome responses from:

- heat network operators
- heat network suppliers
- energy services companies
- housing providers
- consumer groups
- asset owners
- metering and billing agents
- trade associations

We would also welcome responses from other stakeholders and the public.

© Crown copyright 2025

The text of this document may be reproduced (excluding logos) under and in accordance with the terms of the [Open Government Licence](#).

Without prejudice to the generality of the terms of the Open Government Licence the material that is reproduced must be acknowledged as Crown copyright and the document title of this document must be specified in that acknowledgement.

Any enquiries related to the text of this publication should be sent to Ofgem at:

10 South Colonnade, Canary Wharf, London, E14 4PU.

This publication is available at www.ofgem.gov.uk. Any enquiries regarding the use and re-use of this information resource should be sent to: psi@nationalarchives.gsi.gov.uk

Contents

Heat networks regulation: fair pricing protection guidance	1
Executive Summary	4
Introduction.....	7
Interactions with existing housing legislation.....	8
Related publications	9
How to respond	10
Your response, your data and confidentiality	10
General feedback.....	11
How to track the progress of the consultation.....	11
1. Fair pricing	12
Context.....	12
Scope of consumer protections	12
Non-domestic consumer protections	12
Market segmentation	13
Questions related to cost-reflective pricing guidance.....	14
Questions related to cost efficiency guidance.....	14
Questions related to fair and reasonable returns guidance	14
Questions related to affordability guidance.....	14
Questions related to regulatory control guidance.....	15
Questions related to price transparency guidance.....	15
Questions related to the 'fairness test'	15
2. Cost allocation.....	16
Context.....	16
Questions related to general cost pass-throughs	16
Questions related to tariff structure	16
Questions related to depreciation/capital cost recovery	16
Questions related to bad debt	17
Questions related to corporate risk	17
Questions related to fuel procurement.....	17
Questions related to fair and reasonable returns	17
Questions related to penalties and redress.....	17
Questions related to legacy arrangements	17
Questions related to connection charges.....	17
Appendix 1 - Privacy notice on consultations.....	19
Personal data	19

Executive Summary

[The Energy Act 2023](#) named Ofgem as the regulator for heat networks in Great Britain (England, Scotland, and Wales). Our [Forward Work Plan](#) outlines the work we are doing in 2025 and 2026, including our ongoing preparations for our new regulatory responsibilities for heat networks and the commencement of the new regime in January 2026. We aim to develop a proportionate regulatory framework, balancing consumer protection and supporting investment in the sector and government targets for net zero.

This document provides a series of questions to seek specific feedback on our issued fair pricing and cost allocation draft guidance.

This document will seek feedback on the following areas:

- fair pricing principles guidance
- cost allocation guidance

The related draft guidance has been developed in conjunction with previous stakeholder feedback and agreed outcomes that we expect for heat network consumers.

The Heat networks regulation: fair pricing protections consultation ('[2025 consultation](#)') raised several common themes among responses which we have taken into consideration when developing the draft guidance.

Clarity

Respondents requested further clarity where terms such as 'fair', 'disproportionate' and 'reasonable returns' are used and not clearly defined. Respondents also requested a definition be provided for 'not-for-profit'. Likewise, more detailed guidance, including clarification on definition, has been requested in cost allocation.

In response to the definitions request, we will clarify all terms where possible within guidance. Additionally, a monitoring consultation will be produced to set out reporting requirements and definitions.

In relation to the request for more detailed cost allocation guidance, we consider that the guidance will not be used to set fixed thresholds, but we will apply a 'fairness test' using tools like benchmarking and case-by-case price investigations to assess compliance with the principles.

Principles

Some respondents suggested that cost reflective pricing as a principle risked increasing costs (in cases where these were previously subsidised by external funds).

It was argued that the affordability principle should consider 'fuel poverty'.

Additionally, respondents suggested that the framework should explicitly support investment in the sector, and that further guidance on 'competing principles' such as between industry growth and consumer outcomes, would be welcomed.

We can be clear that reflective pricing does not prevent prices from being subsidised by external funds or other forms of cross-subsidisation (with the limitation that other consumers should not face disproportionate prices as a result).

We acknowledge that 'fair' does not mean affordable to all and are in the process of developing consumer protections to support vulnerable consumers.

We consider that the fair and reasonable returns and cost reflectivity principles will reflect the need for networks to make reasonable profits.

We consider pricing regulation needs to be proportionate in order to support investment, but do not see driving market growth as a primary aim of pricing regulation.

Regulatory overlap

Respondents have suggested that our fair pricing regulation may overlap with zoning on pricing rules and duplicate the developing Heat Networks Technical Assurance Scheme (HNTAS).

Stakeholders have asked for clarification on how cost allocation guidance is expected to interact with current tenant and landlord legislation.

We are working with DESNZ on zoning to ensure clear alignment. Zoning requirements on price are being developed in addition to Ofgem rules.

Within our pricing principles is a general principle for networks to operate efficiently. We propose avoiding specifying technical efficiencies in our guidance at this stage to avoid duplication of HNTAS rules.

We are also collaborating with DESNZ to avoid unnecessary duplication of reporting.

As part of the 2025 ICP government response ([Heat networks regulation: implementing consumer protections – Government response](#)), DESNZ and the Ministry for Housing, Community, and Local Government (MHCLG) have committed to further exploring options for unbundling heat charges from housing charges. As part of this work they will be exploring a number of legislative and practical impacts, including the relationship between existing leases and housing law.

Next steps

Some areas of our consumer protections require further development and engagement with stakeholders, and as such are not the subject of this consultation. Future pricing work will take forward areas covered within the [2025 consultation](#) such as the implementation of benchmarking, increasing central price transparency, and undertaking price investigations. We also plan on consulting on our approach to Guaranteed Standards of Performance (GSOPs).

Introduction

This consultation document provides context to the related draft guidance which builds on the approaches proposed in the [2024 consumer protection consultation](#) and settled in the [2025 government response](#). In this consultation we do not revisit matters that were settled through those publications. The focus is instead on developing the first iteration of guidance to support the market's adjustment to the authorisation conditions, including suppliers, operators and consumers.

Our intention is for this guidance to be iterative in order to accommodate phased pricing protections and other policy developments. We acknowledge the need for flexibility to keep developing policy, with the balance between prescriptive rules and guidance open to change over time if required.

The pricing guidance aims to set minimum expectations, principles, and examples of best practice. These are to be used by heat networks as a guide to our principle-based approach rather than (unless otherwise indicated) as a set of prescriptive rules. Areas of guidance set out additional detail on how each relevant principle applies to an area of pricing or cost allocation and expected standards resulting from these principles.

While stakeholders have called for a comprehensive catalogue of guidance for authorised persons and consumers across all areas of the regulatory framework, we are clear that our guidance for heat networks will need to be of an iterative nature. We are proceeding with an ambitious timetable to provide consumers with protections as soon as possible while balancing the need to provide future authorised persons with sufficient guidance to support their initial compliance with our authorisation conditions.

We have therefore used stakeholder feedback to our consultations and external engagement, to inform and prioritise this first iteration of guidance on heat network consumer protections.

While the related guidance is subject to stakeholder feedback through the consultation process, all proposals have been based on the agreed outcomes that we expect for heat network consumers. We encourage stakeholders to consider this guidance in preparation for the incoming regulatory regime and use it to ensure that their processes and activities reflect our expectations as we take on the role of regulator in the heat network sector.

Some areas of our consumer protections require further development and engagement with stakeholders, and as such are not the subject of this consultation. For example, we

plan to further consult on our approach to Guaranteed Standards of Performance (GSOPs).

Interactions with existing housing legislation

The commencement of our regulatory role in the heat network sector represents the start of a significant change to both those who supply and operate heat networks, and consumers who receive heat from them. However, we also recognise that, for some, the supply and operation of a heat network is one part of a broader housing service being provided. In these instances, the authorised persons and their consumers will be subject to both our authorisation conditions and existing housing legislation.

We have been working with industry and across government to understand the interaction with existing housing legislation, and we think it is important the routes for consumers to raise issues are clear. Government is further exploring the unbundling of the heat charge from wider charges. However, this will take time as it requires further cross-sector work and potential changes to significant existing legal and regulatory frameworks. We are interested in working with government and stakeholders to explore opportunities to align requirements where possible, with the aim of achieving consistent consumer outcomes in the sector while mitigating unnecessary regulatory burden. We are aware of wider reforms being considered in housing and are keen to explore opportunities to consider where guidance could be used to achieve more alignment.

For authorised persons, this means that all activity relevant to the supply or operation of a heat network should be assessed in advance of and in line with our authorisation conditions. We have stated in our guidance where we believe these key areas of overlap or interaction may occur, but anticipate that this guidance will likely need to be updated following commencement as the regulatory landscape continues to develop.

For consumers, this may mean that the outcomes our requirements aim to achieve are not always possible, or consistent, across the sector. It may also mean that we are not the appropriate authority for some issues, and they should instead be escalated through traditional housing routes, such as the First Tier Tribunal. We are also assured that organisations such as the Housing and Energy Ombudsman, are working closely to identify instances where consumers may need additional support.

We are interested in feedback from those in the housing sector on how this guidance can be updated to help suppliers, operators, and consumers navigate any overlap or interactions. We will also continue to work with industry and government, contributing to change where it is possible.

Related publications

This document makes references to, and should be read in conjunction with, the most recent joint DESNZ-Ofgem consultations:

- The '[2023 consultation](#)' refers to the Heat networks regulation: consumer protections consultation published in August 2023, which informed the Heat Networks Market Framework Regulations SI (2025 HNMFRGBR SI). The subsequent government response is referred to as the '[2024 government response](#).'
- The '[2024 ICP consultation](#)' refers to the Heat networks regulation: implementing consumer protections consultation published in November 2024.
- The subsequent government response, published in August 2025, is referred to as the '[2025 ICP government response](#).'
- The Ofgem Fair Pricing consultation, published April 2025, which preceded this draft guidance and consultation, is referred to as the '[2025 consultation](#)'
- The Consumer Protection '[Draft guidance: Heat network consumer protections](#)'
- Stakeholders should read this in conjunction with the most recent version of our authorisation conditions for fair pricing and cost allocation, published in Annex 5 of the [response to the fair pricing protections consultation](#).

At each reference point within this document, please refer to the relevant links for the webpage where you can access these previous publications.

How to respond

We want to hear from anyone interested in this consultation. Please send your response to the person or team named on this document's front page.

We've asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

We will publish non-confidential responses on our website at <https://consult.ofgem.gov.uk/>.

Your response, your data and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We'll respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you *do* wish to be kept confidential and those that you *do not* wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we'll get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the UK's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

General feedback

We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:

1. Do you have any comments about the overall process of this consultation?
2. Do you have any comments about its tone and content?
3. Was it easy to read and understand? Or could it have been better written?
4. Were its conclusions balanced?
5. Did it make reasoned recommendations for improvement?
6. Any further comments?

Please send any general feedback comments to stakeholders@ofgem.gov.uk

How to track the progress of the consultation

You can track the progress of a consultation from upcoming to decision status using the 'notify me' function on a consultation page when published on our website. Choose the notify me button and enter your email address into the pop-up window and submit.

[ofgem.gov.uk/consultations](https://www.ofgem.gov.uk/consultations)

Notify me +

Would you like to be kept up to date with *Consultation*
name will appear here? subscribe to notifications:

Email*

Submit >

Once subscribed to the notifications for a particular consultation, you will receive an email to notify you when it has changed status. Our consultation stages are:

Upcoming > **Open** > **Closed** (awaiting decision) > **Closed** (with decision)

1. Fair pricing

Section summary

In the draft fair pricing guidance document, we outline guidance on the fair pricing authorisation condition. This guidance sets out minimum expectations and best practice in relation to a set of pricing principles that guide the application of the fair pricing obligation. It also makes provisions about how we will determine whether charges are fair and not disproportionate through the application of a 'fairness test'.

Context

The draft fair pricing guidance outlines how the fair pricing obligation for heat networks will be applied in practice. It sets out minimum expectations and best practice aligned with a set of pricing principles, and introduces a fairness test to assess whether prices are fair and not disproportionate. This framework supports the implementation of the 'fair pricing' authorisation condition, which places a general obligation on authorised persons to ensure prices are fair and not disproportionate.

The framework includes an overarching objective, two outcomes, and six guiding principles. Authorised persons are expected to apply these principles in a way that is consistent with the overall objectives and outcomes. The guidance also introduces a segmentation approach, recognising that different types of heat networks may require targeted regulatory treatment.

Scope of consumer protections

Non-domestic consumer protections

The monopolistic nature of heat network infrastructure has been a key driver in our development of stronger consumer protections for the sector. We believe that this also impacts non-domestic consumers and may weaken their negotiating power. The [2025 ICP government response](#) confirmed the areas of consumer protection we are expanding to ensure a better quality of service for non-domestic consumers. This included, but was not limited to, the Standards of Conduct being applied to all non-domestic customers, and the complaint handling proposals including:

- access to the relevant alternative dispute resolution (ADR) scheme covering Heat Network Small Business Consumers
- certain Guaranteed Standards of Performance (GSOPs) applying to all non-domestic consumers.

To support the implementation of these protections, and ensure that the framework is understood by stakeholders, we also confirmed the reappropriated thresholds for Heat network Micro Business Consumers and Heat Networks Small Business Consumers.

A Heat Network Micro Business Consumer is defined as one which meets the following criteria: it consumes less than 247,000 kWh of heat per year; or it has less than 10 full-time employees or an annual turnover of less than £2 million.

A Heat Network Small Business Consumer will be defined as one which meets the following criteria: it consumes less than 420,000 kWh of heat per year; or has fewer than 50 employees (or their full-time equivalent) and an annual turnover no greater than £6.5 million or balance sheet total no greater than £5 million.

We are keen to work closely with the sector to better understand the needs of non-domestic heat network consumers, ensuring that regulation is effective for the whole sector. We consider that meeting the precedent of protections set by our recent [non-domestic market review](#) is an effective first step, establishing an initial baseline from which those consumers can negotiate terms. We are also likely to revisit and update non-domestic consumer protection guidance following regulatory commencement.

To support stakeholders' understanding of these protections, and the scope of the authorisation conditions, we have provided an updated scope table 1 on page 15. Stakeholders should note that this table is not exhaustive and contains references to the authorisation conditions relevant to this consultation only. As with the guidance, it is likely that we will continue to review the table and update or expand when appropriate.

Market segmentation

We acknowledge stakeholder responses to the [2024 ICP consultation](#) which called for a more prescriptive approach to market segmentation, including, but not limited to, interest in segmented rules for:

- shared ground loops
- supported housing
- community-led networks
- right to manage groups

In reference to these, and other characteristics, some stakeholders encouraged us to implement standalone authorisation conditions designed for individual networks. Others highlighted that a more flexible, outcome-based approach might be more effective in achieving our regulatory objectives while reflecting the diversity of the heat network market.

While we want to, over time, produce appropriate guidance to support all stakeholders, we do not think it would be practical to attempt to provide an individualised rulebook, or guidance, to account for the scale of diversity present in the sector.

We understand that diversity within the heat network market, both in terms of consumers and resource availability, will impact how an authorised person achieves the expected consumer outcomes. We want to encourage flexibility and innovation whilst ensuring that heat networks comply with our requirements and the heat network consumer experience improves across the sector.

Table 1 Scope of authorisation conditions

Authorisation condition	Supplier	Operator	Domestic	Micro-business	Small business	Large non domestic	Self-supply	Industrial
Fair pricing	✓	✓	✓	✓	✓	✓	N/A	N/A
Cost allocation	✓	✓	✓	✓	✓	✓	N/A	N/A

Questions related to cost-reflective pricing guidance

- Q1. Do you agree, partially agree, or disagree with the proposed guidance in relation to the cost-reflective principle?
- Q2. How can we improve guidance in relation to the cost-reflective principle?

Questions related to cost efficiency guidance

- Q3. Do you agree, partially agree, or disagree with the proposed guidance in relation to the cost efficiency principle?
- Q4. How can we improve guidance in relation to the cost efficiency principle?

Questions related to fair and reasonable returns guidance

- Q5. Do you agree, partially agree, or disagree with the proposed guidance in relation to the fair and reasonable returns principle?
- Q6. How can we improve guidance in relation to the 'fair and reasonable returns' principle?

Questions related to affordability guidance

Q7. Do you agree, partially agree, or disagree with the proposed guidance in relation to the affordability principle?

Q8. How can we improve guidance in relation to the affordability principle?

Questions related to regulatory control guidance

Q9. Do you agree, partially agree, or disagree with the proposed guidance in relation to the regulatory control principle?

Q10. How can we improve guidance in relation to the regulatory control principle?

Questions related to price transparency guidance

Q11. Do you agree, partially agree, or disagree with the proposed guidance in relation to the price transparency principle?

Q12. How can we improve guidance in relation to the price transparency principle?

Questions related to the 'fairness test'

Q13. Do you agree, partially agree, or disagree with the proposed 'fairness test'?

Q14. How can we improve guidance in relation to the 'fairness test'?

Questions related to market segmentation

Q15. Do you agree, partially agree, or disagree with the proposed market segmentation approach?

Q16. How can we improve the proposed segmentation approach?

Q17. Do you agree, partially agree, or disagree with the proposal that the fair pricing framework would cover all non-domestic consumers, including larger non-domestic consumers?

Q18. If you disagree with the proposal to include all non-domestic consumers within the scope of the fair pricing protections, please specify what changes you would like to see and provide a justification.

2. Cost allocation

Cost allocation refers to how heat suppliers allocate costs to the various charges they levy on consumers, and how prices are structured more generally. Based on the responses from stakeholders in the [2025 consultation](#), we will be going ahead with providing high-level guidance for cost allocation.

This guidance aims to provide some best practices around broad cost allocation practices that occur in the market. The proposed best practices are linked to principles that are outlined in the previous chapter of fair pricing principles.

In addition to the guidance, we will be imposing only one prescriptive rule initially which is that Guaranteed Standards of Performance (GSOP) payments, compensations, fines, penalties and costs of redress provided to consumers should not be passed through to customers.

Context

We have previously set out the potential case for us to set prescriptive rules on how heat suppliers should allocate their costs when setting charges in the [2023 consultation](#). However, imposing prescriptive cost allocation rules also has potential downsides, including limiting the ability of heat suppliers to adopt pricing structures that suit their diverse customer bases and business needs, as well as the extra regulatory and resource burden of reporting, monitoring and enforcement. Based on the responses from stakeholders in the [2025 consultation](#), we will be going ahead with providing high-level guidance for cost allocation.

Questions related to general cost pass-throughs

- Q19. Do you agree, partially agree, or disagree with our approach to cost allocation related to general cost pass-throughs?
- Q20. How can we improve guidance for cost allocation related to general cost pass-throughs?

Questions related to tariff structure

- Q21. Do you agree, partially agree, or disagree with our approach to cost allocation related to tariff structure?
- Q22. How can we improve guidance for cost allocation related to tariff structure?

Questions related to depreciation/capital cost recovery

Q23. Do you agree, partially agree, or disagree with our approach to cost allocation related to depreciation/capital cost recovery?

Q24. How can we improve guidance for cost allocation related to depreciation/capital cost recovery?

Questions related to bad debt

Q25. Do you agree, partially agree, or disagree with our approach to cost allocation related to bad debt?

Q26. How can we improve guidance for cost allocation related to bad debt?

Questions related to corporate risk

Q27. Do you agree, partially agree, or disagree with our approach to cost allocation related to corporate risk?

Q28. How can we improve guidance for cost allocation related to corporate risk?

Questions related to fuel procurement

Q29. Do you agree, partially agree, or disagree with our approach to cost allocation related to fuel procurement?

Q30. How can we improve guidance for cost allocation related to fuel procurement?

Questions related to fair and reasonable returns

Q31. Do you agree, partially agree, or disagree with our approach to cost allocation related to fair and reasonable returns?

Q32. How can we improve guidance for cost allocation related to fair and reasonable returns?

Questions related to penalties and redress

Q33. How can we improve guidance for cost allocation related to penalties and redress?

Questions related to legacy arrangements

Q34. Do you agree, partially agree, or disagree with our approach to cost allocation related to legacy arrangements?

Q35. How can we improve guidance for cost allocation related to legacy arrangements?

Questions related to connection charges

Q36. Do you agree, partially agree, or disagree with our approach to cost allocation related to connection charges?

Q37. How can we improve guidance for cost allocation related to connection charges?

--

Appendix 1 - Privacy notice on consultations

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, "Ofgem"). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

(Include here all organisations outside Ofgem who will be given all or some of the data. There is no need to include organisations that will only receive anonymised data. If different organisations see different set of data then make this clear. Be as specific as possible.)

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for (be as clear as possible but allow room for changes to programmes or policy. It is acceptable to give a relative time e.g. 'six months after the project is closed')

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas (Note that this cannot be claimed if using Survey Monkey for the consultation as their servers are in the US. In that case use “the Data you provide directly will be stored by Survey Monkey on their servers in the United States. We have taken all necessary precautions to ensure that your rights in term of data protection will not be compromised by this”.

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system. (If using a third party system such as Survey Monkey to gather the data, you will need to state clearly at which point the data will be moved from there to our internal systems.)

10. More information For more information on how Ofgem processes your data, click on the link to our “[ofgem privacy promise](#)”.