

# Decision

## Heat networks regulation: regular data reporting guidance

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This document sets out our decision following consultation on draft guidance for regular data reporting guidance which was published on 18 November 2025. It provides a summary of responses to each question in the consultation and the details of our decisions.

We have published an updated version of the Heat networks regulation: regular data reporting guidance alongside this decision.

## Decision Heat networks regulation: regular data reporting guidance

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### Executive summary

Ofgem has been appointed as the regulator for heat networks and since 27 January 2026, heat networks must now comply with consumer protection regulations as part of their authorisation conditions. The aim of the new regulatory regime is to deliver good outcomes for heat networks customers. We want to ensure heat network customers are treated fairly, receive clear and transparent information about their heat supply, a reliable service and fair prices. In developing the detailed [authorisation conditions](#) underpinning these outcomes, we are introducing a framework that aims to be proportionate, cost effective and drives improvements in consumer outcomes, while delivering a stable regime which supports investment. To provide oversight of heat network compliance with the new regulations, we are introducing data reporting that will be our primary source of intelligence from the heat network sector.

Our previous publications have helped develop our work on the monitoring regime. Our approach to monitoring is designed to enhance our understanding of the sector as we take on our new regulatory role and to assist us in shaping our approach to regulating this sector. It will also support our approach to compliance, where we will work with the sector to embed the new consumer protection requirements.

A common piece of feedback from previous consultations has been to introduce guidance to support industry in meeting their requirements. This consultation was to ensure the sector and the regulated authorised persons had an opportunity to feedback on the draft guidance that aims to support their ongoing data reporting requirements.

The data reported during the first year of regulation will be important for Ofgem to develop a greater understanding of the sector which we will use to refine and strengthen the framework. We want our requests for data from the market to be proportionate and will only ask for data that we consider necessary. As our knowledge of the heat network market grows, we will continue to review data requirements to ensure it remains proportionate.

The monitoring framework forms part of our engagement with the sector to measure compliance with the authorisation conditions. Where there is non-compliance, our aim is to have an open and supportive dialogue with heat networks. We encourage self-reporting of issues and the submission of available data even if it will mean an incomplete data set through our digital service to support this transparent approach. For more information on our approach to engagement with the sector please see our [heat networks compliance approach](#).

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### Introduction

This is the decision to the consultation “Heat networks regulation: data reporting guidance” which was open from 18 November 2025 to 12 January 2026.

The consultation presented a first version of guidance for data reporting for the sector to provide feedback on. The consultation outlined our intention to collect the data points within the guidance and for existing heat networks to backdate those data points to April 2026.

### Context and related publications

Following regulatory commencement, the [general authorisation conditions](#) which the regularly reported data points are based on, came into effect. Authorised persons should read the guidance alongside the authorisation conditions to understand their ongoing data reporting obligations, as well as the other available guidance.

### Decision-making stages

We received 31 responses to the consultation from a range of stakeholders including trade associations, consumer groups and heat network suppliers and operators. We have reviewed all the responses and provide a summary of these here. We have reflected feedback in the updated version of guidance which has been published alongside this decision.

### Our decision

In the consultation we provided descriptions of the data points, alongside information about which authorised entities would not be required to provide certain data, and whether the supplier or operator is required to provide it in the event they are separate entities on a heat network. We have updated the descriptions based on feedback received during the consultation period and additional stakeholder engagement.

The consultation also covered our approach to backdating. We proposed that, once registration was complete and monitoring functionality introduced to the digital service, heat networks would be required to provide data from the period beginning April 2026.

We acknowledge feedback to the consultation that some heat networks will not be in a position to provide all the necessary data from April 2026. We will still request all data from April 2026 and our preference is for heat networks to provide a full submission. However, initially where heat networks do not have all the data available, they should still provide a partial submission.

Going forward, as we continue to gather data on the market through our monitoring regime and other sources of intelligence, we will review both our approach to monitoring and future iterations of data reporting guidance.

### 1. Guidance on data reporting

We consulted on draft guidance including the enduring reported data points and their descriptions, as well our approach to backdating data.

We have further developed the data descriptions following feedback from the sector. We have sought to provide additional detail to clarify issues raised by stakeholders in their responses.

Stakeholders indicated issues meeting the requirements in time given the changes needed to their systems. We have updated our approach to backdating and what our expectations are for the first year of reporting.

Stakeholder feedback often asked for clarity to help ensure compliance with the requirements and what would happen in the event of non-compliance. We have provided some detail our approach to compliance with the data reporting requirements in this document, but we also recommend reading our published [compliance approach](#).

### Question analysis

**Q1. Do you agree that the descriptions of the data points are clear? Are there any data points where we could provide a clearer description?**

Table 1: Response summary for consultation question 1

Response	Number of responses	Percentage
Agree	9	29%
Partially agree	17	55%
Disagree	5	16%
Not answered	0	0%
Comments	28	

- 1.1 The majority (55%) partially agreed and had recommendations or questions about the data descriptions within the guidance. Nine respondents agreed and five disagreed. Of the 31 stakeholders who answered the question, 28 provided comments.
- 1.2 Several stakeholders requested that the glossary should be expanded to include additional definitions or more detailed descriptions of terms used for data points.

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Terms that could be added to the glossary included smart metering, heat Cost allocators, bad debt, non-domestic customers and repayment plans.

- 1.3 Some stakeholders asked whether estimated data or a best indication of data could be submitted, including scenarios such as heat networks being unmetered.
- 1.4 Some respondents who agreed or otherwise thought the data points were clear still provided feedback to improve the data point descriptions.
- 1.5 Stakeholders supported the format of the data points being spilt between the tables. Some stakeholders commented whether the data points that could be submitted as having not changed since the last submission or which ones would not be provided by unmetered heat networks be included within the tables.
- 1.6 Two small heat networks who disagreed flagged that they would struggle to gather the data set as a whole. Two other respondents also highlighted that guidance and the descriptions could be clearer for heat networks that are a part of blocks of flats.
- 1.7 One respondent noted that the number of self-disconnections is not possible on all Pay As You Go (PAYG) systems. Whilst snapshots could be available, the number of all instances of self-disconnections could not be provided until development from existing PAYG system providers.
- 1.8 Our response is on page 9.

**Q2. Do you agree with the requirement to provide data back to April 2026 following registration for existing networks? If not, what would be a reasonable start date to collect data from and please state what factors would prevent your organisation from gathering and holding onto this data from April 2026?**

Table 2: Response summary for consultation question 2

Response	Number of responses	Percentage
Agree	12	39%
Partially agree	9	29%
Disagree	9	29%
Not answered	1	3%
Comments	27	

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- 1.9 The highest number of responses agreed with data being backdated to April 2026 following registration. An equal number of responses either partially agree or disagreed.
- 1.10 Respondents who agreed or partially agree still tended to caveat with expectations around flexibility for data submissions.
- 1.11 Some stakeholders asked for clarity about whether Ofgem would accept incomplete submissions or estimated data. There were additional requests for increased clarity on data points as well as timescales and formats for data submission to help authorised persons meet the data requirements for April 2026.
- 1.12 Some stakeholders raised concerns about Ofgem’s approach to requesting backdated data, given the short turnaround between the anticipated publication date for our guidance and April 2026, as well as our own inability to accept these data submissions until later in 2026.
- 1.13 Some small-scale and larger heat network operators responded that they would find it difficult to implement suitable systems for capturing, storing and submitting the required information ahead of April 2026. Smaller networks highlighted the increased administrative and operational burden involved in amending their existing processes. Organisations with larger portfolios commented that the changes including separating heat networks information within their portfolio would incur significant costs.
- 1.14 Some stakeholders suggested alternative dates to start data reporting in line with when they expected their systems to be ready, including April 2027 and the point at which the digital service can receive data submissions.
- 1.15 The factors that stakeholders thought would prevent gathering data from April 2026:
- operational and billing systems not being in place for April 2026 especially for quarterly data if guidance won’t be out soon
  - small heat networks will struggle providing data because they did not know they were going to be required to collect it
  - significant costs will be incurred by large operators and suppliers to ensure their systems are ready to collect this data, which may end up being passed on to consumers
- 1.16 Our response is on page 9.

### **Q3. What should we consider including in a future iteration of the guidance on regular data reporting, to make it more useful?**

- 1.17 We received 31 comments on this question.

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- 1.18 Nine stakeholders raised concerns about non-compliance. This included concerns where heat networks would struggle to gather data due to their operational systems currently not separating their heat network functions from other enterprises within their portfolio.
- 1.19 Eight stakeholders flagged that reporting requirements should maintain proportionality and rejected a one-size-fits all approach to data reporting.
- 1.20 Six stakeholders suggested template data submissions and walkthroughs to assist smaller operators.
- 1.21 Four stakeholders recommended expanding the glossary to address terms that were open to interpretation. These included terms related to complaints, vulnerability and debt, and financial resilience.
- 1.22 Stakeholders made recommendations for future versions of the guidance. This included three who noted financial resilience data points could also cover unexpected capital costs not just covering insolvency risks.
- 1.23 Two stakeholders asked for clarity on the nomination process of operators in multi-entity heat networks.
- 1.24 Our response is on page 9.

## **Ofgem response**

### **Data points and descriptions**

Following feedback from the sector we have provided additional lines to the descriptions of the data points within the guidance. We have expanded the glossary to include more terms used in the data point description tables, including on metering and pricing.

We want to clarify that unless we are explicit within the data point description that estimates are acceptable, to ensure data quality, estimated data or a best guess should not be provided and the submission left blank if the data is not available. In this instance heat networks should indicate on the digital service that they do not have the data. We will provide further detail on this process in a future walkthrough document.

Stakeholders raised that the proposed timing of financial reporting data meant that they may not align with when their accounts have been verified, audited or signed off. We have changed the requirement to respond to this feedback and expect that authorised persons submit data that has been subject to their internal governance arrangements, with a backstop requirement that this should be no later than 10 months after their financial year end.

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As we continue to gather data on the market through our monitoring regime and other sources of intelligence, we will continue to review the data points and their descriptions as part of our approach to monitoring and future iterations of data reporting guidance.

Following comments related to the consumer protection data points, for further background on the purpose for asking for data in relation to issues and the basis for the reporting scope, we recommend authorised persons review the updated [consumer protection guidance](#) published 13 January 2026.

### Backdating

Our initial decision to backdate to April 2026 was to have a clear start date for heat networks to start gathering data following regulatory go-live (27 January 2026). Having a requirement to backdate data would also ensure Ofgem had visibility of customer experiences regardless of when an existing heat network completed registration. Given heat networks will need to amend their operational processes to gather the data and in certain cases, separate it from the rest of their portfolio, as well as the publication date of the data reporting guidance being in March, we have decided to take a more proportionate approach to backdating.

Heat networks will be able to provide partially complete data returns if they do not yet have all information available when they start submitting data to Ofgem. We expect heat networks to ensure that over time, they will make sure they have the processes and systems in place to be able to report the full set of relevant data points. Data for July – September 2026 will be the first period reported normally for heat networks that have completed registration by this point. Heat networks that register after the introduction of monitoring will still be required to backdate data to April 2026 when first asked.

### Sector diversity and compliance

The data points listed reflect our need for oversight of the sector and compliance with the authorisation conditions. We recognise that the experience of operators and suppliers with regulation and their ability to come into compliance will vary across the sector. We encourage heat networks to read our [compliance approach](#) and how we intend to navigate the first year of regulation with heat networks in order to ensure the best outcome for customers.

We note feedback from stakeholders to provide templates to help smaller users with their submissions. Whilst we do not intend to produce templates for single heat network uploads, we will be introducing a bulk upload feature to support submission for large portfolios of networks. We have amended text in the guidance to cover bulk upload and to ensure a consistent level of reporting.