

Guidance

Heat networks: regular data reporting (draft)

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This guidance is for authorised heat network suppliers and operators. It is intended to help them meet their regular data reporting requirements as outlined in the ‘Provision of information to the Authority’ authorisation condition.

It describes the data that must be reported on an ongoing basis and who it is required from. It also provides further details, such as the periods that each data report should cover and the deadlines to submit the data.

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1. Overview on data reporting

Context

- 1.1 This guidance is designed to help authorised heat network suppliers and operators understand their data reporting requirements. It gives general guidance on the framework, information on the quarterly and annual submission periods and describes each data point that authorised entities are required to submit.
- 1.2 This document should be read alongside our upcoming data reporting walkthrough which will give users step-by-step instructions on how to submit data to the digital service.

What is data reporting

- 1.3 Data reporting forms a key part of our work to protect the interests of customers through ongoing oversight of the heat network market. Areas of particular interest include key consumer protections such as fair pricing, debt, vulnerability, and quality of service as well as the relevant financial resilience information.
- 1.4 Ongoing reporting from heat networks will also support our approach to compliance, where we will work with the sector to embed the new consumer protection requirements.
- 1.5 As well as ensuring heat network customers are protected, monitoring heat networks will improve our understanding of the market as a whole. This will help identify areas for future policy work and help inform any changes to our approach going forward.

How will we request this data

- 1.6 Authorised persons will receive a request from Ofgem for Information which will notify them of their data reporting obligations. These requests for information will serve as our notice to authorised persons as provided for in the Heat Network Market Framework Regulations 2025.
- 1.7 We want our data requests from the market to be proportionate and will only ask for data that we consider necessary, in order to minimise the burden placed on the sector.

Enduring information requests

- 1.8 To start an authorised person's ongoing data reporting we will issue a Request for Information (RFI). This will be at a point in time after they have completed their registration or have been granted authorisation through the application process

and in line with the introduction of data reporting to the digital service. If we need to amend the reporting requirements laid out in guidance, for example changing the number of data points, their reporting frequency or who it is required from, we will notify authorised persons of these changes.

Additional information requests

- 1.9 We may need additional information on top of the data that an authorised person provides through their regular data reporting obligations. In this event we will outline the data request within a separate RFI and other communications to the authorised person.

Authorisation Condition for requesting this data

- 1.10 Under Authorisation Condition ‘Provision of Information to the Authority’, the authorised person must give necessary information to Ofgem after receiving a request from it. The ‘Provision of Information to the Authority’ condition applies to all authorised persons. An extract is in Appendix 1.
- 1.11 We expect information provided to us to be accurate and timely and we may take action to ensure heat networks comply with information requests.

2. Guidance on data submission

Submission periods and deadlines

Submission periods

- 2.1 Suppliers and operators will be required to submit reporting data on both a quarterly and an annual basis. When an annual data submission is due, this will be done in the same reporting window as the relevant quarterly data submission.
- 2.2 Data should be taken as a snapshot which is the figure or value at the last calendar day of the reporting period unless specified otherwise by the data description.

Deadlines

- 2.3 Regularly reported data may be submitted to Ofgem up to the final day of the month after the end of the quarter. Annual data submissions, with the exception of financial resilience data points, will always be required by 30 April.
- 2.4 Quarterly and annual submission periods and their windows are shown in tables 1 and 2 respectively as well as in figure 1.

Financial data reporting

- 2.5 As the financial year start and end dates may vary between organisations, the point in time that financial data is prepared will also vary. To ensure that the latest data can be submitted, instead of providing financial resilience data at a fixed point in time, suppliers and operators will provide data in the next quarter following the end of their financial year.
- 2.6 For example, if your financial year ends between 1 January and 31 March, quarter 4, you would be required to submit financial resilience data by 31 July.

Table 1: Quarterly reporting and submission windows

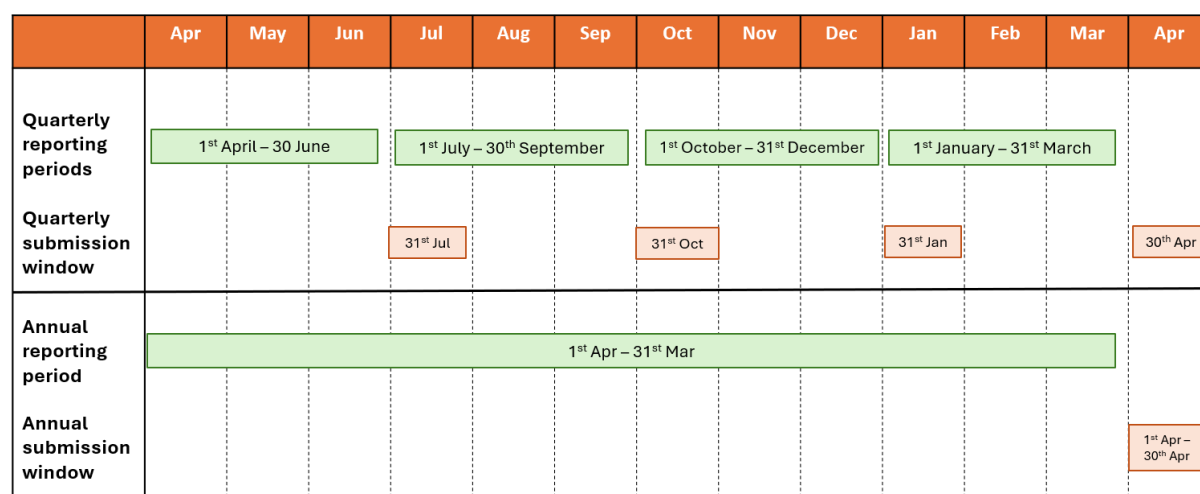
	Quarter 1	Quarter 2	Quarter 3	Quarter 4
Reporting quarter period	1 April – 30 June	1 July – 30 September	1 October – 31 December	1 January – 31 March
Submission window	1 July – 31 July	1 October – 31 October	1 January – 31 January	1 April – 30 April

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Table 2: Annual reporting period and submission window (not including financial resilience)

Reporting period	Annual
Reporting year period	1 April (Year 1) – 31 March (Year 2)
Submission window	1 April – 30 April (Year 2)

Figure 1: Annual and quarterly reporting periods



The data we are requesting

- 2.7 The below tables 3-8 outline the data we expect to be regularly reported by authorised persons.
- 2.8 We will not always require data to be submitted in each reporting period – for example, where we do not expect changes to the data over time. Instead, users will be required to review the data previously submitted and can confirm whether there are any changes to the currently held data or not.
- 2.9 Not all data points will be required from every authorised person, or both the supplier and operator in the event they are separate entities. When checking whether you need to provide the data point you should take note of the following:
- whether the data point is required from the supplier or operator
 - if the type of heat network is exempted and is not required to provide the data
 - if the consumer type that the heat network exclusively supplies is exempted and is not required to provide the data
 - concerning organisational level data, if the authorised supplier or operator is not required to provide the data

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- 2.10 Supplier and Operators will also need to consider the level at which the data is reported, those levels being organisation and heat network.

Organisation level data

- 2.11 Organisation level data is provided once per year by the supplier or operator. This is regardless of how many heat networks it is authorised to supply or operate. The information concerns the organisation itself that is authorised.

Heat network level data

- 2.12 Heat network level data means the supplier or operator must provide the data point for the heat network they are supplying or operating. If it is a district heat network, data from each building or communal network on that district network should be aggregated into a single figure covering the whole district network.
- 2.13 For some data points such as pricing information, data may vary across parts of the heat network. In order to capture pricing differences across a heat network, users will be able to submit multiple responses to capture these differences.

Backdating data

- 2.14 During the first part of the initial period, existing heat networks that are deemed authorised will be able to register with the digital service from April 2026 until January 2027. As data reporting will be phased in later, it will therefore be necessary for registered networks to submit information that was recorded from April 2026. Heat networks will be able to submit the data they have been collecting from April 2026, once they have completed registration and the functionality to submit data to the digital service is introduced later in 2026.

Data submissions when there are no changes

- 2.15 We will not always require data points to be submitted each reporting period – for some data points where we do not expect change. We will instead allow for users to review their previous data submission and confirm whether there have been no changes. This will help streamline data reporting for data points less subject to change.

Multiple operators and bulk supply

- 2.16 For heat network level data where there are multiple operators who carry out activity on a single heat network, the ‘nominated operator’ would be responsible for submitting data on behalf of the other operators on the network. We will still expect the other operators on the network to share or submit relevant reporting data that they hold but the ‘nominated operator’ will be the first point of contact. As the multiple operators are authorised entities they will still individually be required to submit their own financial reporting data.

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- 2.17 Where a supplier is supplying heating, cooling or hot water to another relevant heat network as part of a bulk supply agreement, the number of agreements should be included in the number of non-domestic customers as part of their data return.

Incorrect data

- 2.18 In the event of incorrect data being submitted it should be rectified at the earliest opportunity with the correct information. For a step-by-step guide on amending data submissions please refer to the data reporting walkthrough.
- 2.19 As per regulation 62 of the [Heat Network Market Framework Regulations 2025](#), heat networks must not provide information that the person knows to be false or misleading, or to be reckless as to whether it is. If an authorised person becomes aware that it has submitted incorrect data this should be corrected and raised to the Authority at the earliest opportunity.

Organisational level data

The data points in table 3 are to be provided at the organisational level as described in 2.11.

Financial Resilience and continuity arrangements

Table 3: Financial Resilience data points

Data point	Data point description	Reporting Interval	Required by the Supplier or Operator	Authorised entity types data is <u>not</u> required from	Heat networks data is <u>not</u> required from
Confirmation of a compliant Operation/Supply Continuity Plan	This is a yes or no response, answering whether you have an Operation/Supply Continuity Plan that is compliant with the Authorisation Condition "Continuity arrangements" and meets the requirements outlined in the relevant guidance.	Annual	Supplier and Operator	Local Authorities and Registered Social Housing Providers	Industrial and Self-supply
Does the authorised entity reasonably expect to have sufficient finance and resources available to carry on its regulated heat network activity for the next 12 months?	This is a yes or no response from the authorised entity on their financial and resource position, in order to provide an indication of the organisation's confidence in its financial health. Once the organisation has completed its financial year and has time to assure the data in its accounts or after assessing its financial position, this response should provide assurance that it expects to have sufficient resource to continue carrying out regulated activity. If an organisation does not believe they have sufficient resource to continue at any point throughout the year they should contact Ofgem in line with the 'Availability of resource and financial responsibility principle' authorisation condition.	Annual	Supplier and Operator	Local Authorities and Registered Social Housing Providers	Industrial and Self-supply

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What was the authorised entity's net profit or loss for the previous financial year?	Provided as a £ figure, this is the profit or loss after tax, with loss being provided as negative figure, for the financial year. We would expect this figure to be the same as what is submitted to other relevant regulatory bodies as part of the authorised person or entities' accounts, not the individual heat network.	Annual	Supplier and Operator	Local Authorities and Registered Social Housing Providers	Industrial and Self-supply
What was authorised entity's total income for the previous financial year	Provided as a £ figure, this is the earnings the organisation received, or receivable as reported the previous financial year.	Annual	Supplier and Operator	Local Authorities and Registered Social Housing Providers	Industrial and Self-supply
What were the total running costs for the previous financial year	Provided as a £ figure, this is the ongoing expenses/costs incurred by the organisation as reported from the previous financial year.	Annual	Supplier and Operator	Local Authorities and Registered Social Housing Providers	Industrial and Self-supply
What is the total value of liquid assets that the authorised entity controls or has unrestricted access to	Provided as a £ figure, Liquid assets are financial assets that an authorised entity has available to quickly meet its obligations. This includes cash, reserves or money received as part of a government backed loan scheme. In this instance 'Control' and 'unrestricted access' means the organisation can access these assets without external input from their parent company or other organisations. The figure would be reported as it was on the final day of the financial year. If the organisation has no access to liquid assets, it should be reported as a zero return.	Annual	Supplier and Operator	Local Authorities and Registered Social Housing Providers	Industrial and Self-supply

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Did assets exceed its liabilities at the end of the most recent financial year	This is a yes or no response. This is the difference between the value of the assets, liquid assets and fixed assets that the authorised entity owns and controls and the amount of liabilities, debts or obligations, that the authorised entity owes.	Annual	Supplier and Operator	Local Authorities and Registered Social Housing Providers	Industrial and Self-supply
Do you hedge (buying fuel in advance)? If yes, how many months ahead and what percentage volume of costs are hedged?	The first part is a yes or no response. A hedging strategy is where an organisation purchases electricity, gas or fuel for delivery on a future date to protect itself from short-term price fluctuations on the cost of wholesale gas or electricity or other input fuel. A hedging strategy is not mandated but an important part of risk management. If yes , a description of how the entity hedges and the number of months' worth of fuel purchased ahead at the time of providing that data should be provided.	Annual	Supplier and Operator	Local Authorities and Registered Social Housing Providers	Industrial and Self-supply

Heat network level data

The data points in tables 4-8: are to be provided at the heat network level as described in 2.12.

General Heat Network Information

Table 4: General Heat Network Information data points

Data point	Data point description	Reporting Interval	Required by the Supplier or Operator	Heat Network types data is not required from	Consumer types data is not required from
Total number of domestic customers	This is the total number of domestic customers being supplied by the heat network. Domestic customers are the dwellings purchasing the supply not the total number of consumers or occupants within the dwellings.	Annual	Supplier	N/A	N/A
Total number of non-domestic customers	This is the total number of non-domestic customers being supplied by the network.	Annual	Supplier	N/A	N/A
Total number of Prepayment meters (PPMs), broken down by smart and legacy meters	Total number of customers on or using PPMs broken down by: -number of PPMs with at least one smart metering technology -number of legacy PPMs.	Annual	Operator	N/A	N/A
Total number of Heat Cost Allocators (HCAs) in the	This is the total number of HCAs within dwellings on the network.	Annual	Operator	N/A	N/A

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buildings or on the network, if any.					
Total number of heat meters domestic customer dwellings, if any.	This is the total number of heat meters in a domestic customer dwelling within the heat network. This does not include meters outside of dwellings such as at the energy centre.	Annual	Operator	N/A	N/A
Total number of customers with smart metering	This is the total number of customers with at least one form of smart metering installed in their dwelling, including smart meters. This does not include smart metering outside the building or in the energy centre.	Annual	Operator	N/A	N/A

Billing

Table 5: Billing data points

Data point	Data point description	Reporting Interval	Required by the Supplier or Operator	Heat Network types data is not required from	Consumer types data is not required from
Billing frequency	This is the frequency that the heat network issues bills to customers on the network, provided as either monthly, quarterly, biannually, annually or other.	Annual	Supplier	Self-supply and Industrial	Non-domestic, Microbusiness and Small businesses

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Number of customers by payment method	The number of customers broken down by the payment schemes that are listed. Prepayment, direct debit or other. 'Other' would include those such as monthly standing order, monthly payment schemes or through cash or cheque.	Annual	Supplier	Self-supply and Industrial	Non-domestic, Microbusiness and Small businesses
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Vulnerability and debt

Table 6: Vulnerability and debt data points

Data point	Data point description	Reporting Interval	Required by the Supplier or Operator	Heat Network types data is not required from	Consumer types data is not required from
The number of consumers in vulnerable situations	This is the total number of domestic consumers and/or occupants who have been identified as being in a Vulnerable Situation and require Priority Services. This should be the same number tracked within a heat network's Priority Service Register.	Annual	Supplier	Self-supply and Industrial	Non-domestic, Microbusiness, and small businesses
The number of domestic customers in debt	This is the total number of domestic customers who have met the Debt Trigger, who have charges worth over £200 which have been outstanding for three months or more after the date the bill has been issued.	Quarterly	Supplier	Self-supply and Industrial	Non-domestic, Microbusiness, and small businesses

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The total value of domestic bad debt	Provided as a £ this is the total value of bad debt or money owed by customers on the heat network which is unlikely to be repaid or considered unrecoverable.	Annual	Supplier	Self-supply and Industrial	Non-domestic, Microbusiness, and small businesses
The number of domestic customer self-disconnections	This is the total number of domestic customers who have self-disconnected during this quarter.	Quarterly	Supplier	Self-supply and Industrial	Non-domestic, Microbusiness, and small businesses
The number of domestic customers disconnected for non-payment	This is the total of domestic customers who were disconnected by the supplier for unpaid charges or non-payment during this quarter.	Quarterly	Supplier	Self-supply and Industrial	Non-domestic, Microbusiness, and small businesses
The number of customers on a repayment plan	This is the total number of domestic customers who are on a repayment plan.	Quarterly	Supplier	Self-supply and Industrial	Non-domestic, Microbusiness, and small businesses
The number of reconnections due to debt being paid or repayment plan agreed	This is the total number of reconnections that were made of disconnection domestic customers during this quarter.	Quarterly	Supplier	Self-supply and Industrial	Non-domestic, Microbusiness, and small businesses
Number of meters involuntarily switched to Prepayment meter	This is the total number of meters on the heat network that were involuntarily switched, manually or remotely, to Prepayment meters from another type of payment method during this quarter.	Quarterly	Supplier	Self-supply and Industrial	Non-domestic, Microbusiness, and small businesses

Quality of service

Table 7: Quality of service data points

Data point	Data point description	Reporting Interval	Required by the Supplier or Operator	Heat Network types data is not required from	Consumer types data is not required from
The number of complaints made, broken down by type.	These are total number of complaints made during this quarter, including group complaints. Complaints fall under the following categories: Vulnerability, debt and switching – Complaints related to disconnections or debt management/ repayment and collection and switches to PPM. Quality of service – Complaints related to Interruptions and disruption to the supply of heating, cooling or hot water. Customer service - Any complaints regarding the services offered by the supplier such as the Billing service or complaints process. Pricing - Any complaints related to high prices, affordability or charges and their disputes, or price increases the supplier may have announced, or which have come into effect. Back billing - Any complaints relating to issues on back billing such as incorrect calculations or not issuing bills. Other - Any others that do not fall within the specified categories	Quarterly	Supplier	Self-supply and Industrial	N/A

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The number of complaints that were group complaints	Of the total number of complaints that were made during this quarter, how many were group complaints. Group complaints are those made on behalf of multiple consumers.	Quarterly	Supplier	Self-supply and Industrial	N/A
The number of complaints referred to the Ombudsman	These are the total number of complaints that led to a letter being sent signposting the Ombudsman at 8 weeks or after a deadlock situation has been reached.	Quarterly	Supplier	Self-supply and Industrial	N/A
The number of complaints resolved by the end of the next working day	This is the total number of complaints that were resolved by the end of the next working day after the complaint was received (Day+1)	Quarterly	Supplier	Self-supply and Industrial	N/A
The number of complaints resolved within eight weeks	This is the total number of complaints that were resolved within 8 weeks (56 calendar days) that the complaint was received	Quarterly	Supplier	Self-supply and Industrial	N/A

Pricing

Table 8: Pricing data points

Data point	Data point description	Reporting Interval	Required by the Supplier or Operator	Heat Network types data is not required from	Consumer types data is not required from
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Standing charges	A standing charge is a fixed charge that does not change with heat usage. It is charged each day, even on days where no heat is used. All levels of standing charge within a heat network should be reported as £ per day.	Quarterly	Supplier and Operator	Industrial and Self-supply	N/A
Unit rates	A unit rate is the rate charged per unit of heat used. All levels of unit rate within a heat network should be reported as £ per kilowatt hour.	Quarterly	Supplier and Operator	Industrial and Self-supply	N/A
Connection charges	A connection charge is the amount charged for each new connection. It is a one-off charge independent of usage. All levels of connection charge within a heat network should be reported as £ per customer.	Quarterly	Supplier and Operator	Industrial and Self-supply	N/A
Other charges, for example one-off charges	Any other charges that are not standing charges, unit rates and connection charges. All levels and types of other charges within a heat network should be reported.	Quarterly	Supplier and Operator	Industrial and Self-supply	N/A
Flat fees	A flat fee is the amount charged per day, regardless of the amount of heat used. This is more likely to be applicable to Shared Ground Loop or unmetered networks. All levels of flat fees within a heat network should be reported as £ per day.	Quarterly	Supplier and Operator	Industrial and Self-supply	N/A
Total charges across all domestic customers	This is the total amount of standing charges, unit rates, connection charges and other charges received across all domestic customers in the reporting quarter period. (£)	Quarterly	Supplier	Industrial and Self-supply	N/A
Total charges across all non-domestic customers	This is the total amount of standing charges, unit rates, connection charges and other charges received across all non-domestic customers in the reporting quarter period. (£)	Quarterly	Supplier	Industrial and Self-supply	N/A

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Charges for customers at reference usage levels	This is the total amount of charges that a reference customer who consumes 6,000 kWh of energy pays in the reporting year period. If there are different levels of charges within a heat network, all charges should be reported. (£)	Annual	Supplier	Industrial and Self-supply	Non-domestic
Pricing Methodology	This is a description of how prices are determined in your heat network. For example, you may include your pricing formula, how you set different components of prices, or whether you follow a 'strict cost recovery methodology' or 'cost avoidance methodology'.	Annual	Supplier and Operator	Industrial and Self-supply	N/A
Types of costs recovered through standing charge	This is the cost stack of the standing charge - what costs are recovered through the standing charge. You may choose from a list of costs provided. Values are not required.	Annual	Supplier and Operator	Industrial and Self-supply	N/A
Types of costs recovered through unit charge	This is the cost stack of the unit rate - what costs are recovered through the unit rate. You may choose from a list of costs provided. Values are not required.	Annual	Supplier and Operator	Industrial and Self-supply	N/A
Types of costs recovered through a flat fee	This is the cost stack of the flat fee - what costs are recovered through the flat fee. You may choose from a list of costs provided. Values are not required.	Annual	Supplier and Operator	Industrial and Self-supply	N/A
Types of costs not passed on	These are costs incurred in running the network but not passed on to customers. You may choose from a list provided. Values are not required.	Annual	Supplier and Operator	Industrial and Self-supply	N/A

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Funding received	These are revenue streams outside of heat network charges, such as government funding. You may choose from a list provided. Values are not required.	Annual	Supplier and Operator	Industrial and Self-supply	N/A
Fuel input type	This is the main type of fuel used to generate heat in your network if it is not procured from outside. You may choose from a list of options.	Annual	Operator	Industrial and Self-supply	N/A
Total heat cost	This is the total heat cost including input fuel cost to generate heat and heat procurement cost in the reporting year period. (£)	Annual	Supplier and Operator	Industrial and Self-supply	N/A
Network generation and heat procured	This is how much heat they have generated and procured in total in the reporting year period. (kilowatt hour)	Annual	Supplier and Operator	Industrial and Self-supply	N/A
Network demand	This is the total heat received by customers in the network in the reporting year period. This can be the sum obtained from individual dwelling meters, the sum obtained from building level meters for bulk supply, or estimates if meter readings are unavailable. (kilowatt hour)	Annual	Supplier and Operator	Industrial and Self-supply	N/A
Total revenue	This is the revenue relevant to heat network activities only in the reporting year period. (£)	Annual	Supplier and Operator	Industrial and Self-supply	N/A

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Expenditures (OPEX, CAPEX, REPEX)	These are operating expenditure (OPEX), capital expenditure (CAPEX) and replacement expenditure (REPEX) relevant to heat network activities only in the reporting year period. For OPEX, you may include fuel and energy costs, operations and maintenance costs, staff and management costs, billing and customer service costs, and costs on insurance and compliance. If this data is not available at the level of the individual heat network, it can be provided as a total of the portfolio of networks an authorised person has. The reporting of CAPEX and REPEX is optional. (£)	Annual	Supplier and Operator	Industrial and Self-supply	N/A
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Appendix 1 – Authorisation condition – Provision of Information to the Authority

Condition Title: Provision of Information to the Authority

Introduction to condition

This condition sets out the requirement on the authorised person to comply with a request from the Authority for information. Given the market segmentation in heat networks and the need to remain flexible in approach to information gathering, it is anticipated that the Authority will use this condition to issue requests for information, including enduring requests.

Provision of Information to Authority

- 1.1. After receiving a request from the Authority for Information that it considers may be necessary or expedient for the performance of any of its functions, the authorised person must give that Information to the Authority.
- 1.2. The Information provided by the authorised person pursuant to paragraph [6.1] must be provided:
 - 6.2.1. in the Form requested;
 - 6.2.2. in the manner and by the means requested;
 - 6.2.3. at such time, or such intervals of time, as requested; and
 - 6.2.4. in accordance with any applicable guidance issued by the Authority and referred to in the request.
- 1.3. The authorised person is not required to comply with paragraph [6.1] if the authorised person could not be compelled to produce or give the Information in evidence in civil proceedings before a court.
- 1.4. The Authority's power to request Information under this condition is additional to its powers to call for Information under or pursuant to any other condition or the Regulations.

Provision of reasoned comments to the Authority

- 1.5. After receiving a request from the Authority for reasoned comments on the accuracy and text of any Information which the Authority proposes to publish under

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regulation 12 of the Regulations, the authorised person must give such comments to the Authority when and in the Form requested.

Appendix 2 – Data point glossary

Definitions

- A2.1 **Complaint** - an expression of dissatisfaction about the standard of service, action or inactions of the authorised person, or those acting on its behalf, where: (a) the dissatisfaction arises in direct response to the carrying out of a regulated activity by the authorised person, or those acting on its behalf; (b) one or more Relevant Consumers are affected; and (c) a response is explicitly or implicitly required or expected to be provided thereafter.
- A2.2 **Debt** - means, where Charges have been outstanding for three months or more after the date the bill has been issued, and Outstanding Charges are more than the amount specified by the Authority for these purposes and the Consumer is not on, or transitioning, to a repayment plan;
- A2.3 **Direct debit** - refers to customers who pay a variable direct debit on a recurring basis
- A2.4 **Domestic customer** - heat network customer supplied or requiring to be supplied by means of a relevant heat network at a Domestic Premises
- A2.5 **Non-domestic customer** - a heat network customer supplied or requiring to be supplied by means of a relevant heat network at a Non-Domestic Premises but excludes such a heat network customer insofar as they are supplied or require to be supplied at premises other than Non-Domestic Premises
- A2.6 **Prepayment meter** - refers to customers who pay for their energy as they go by pre-payment meter
- A2.7 **Reconnection** - This is when you restore a supply of heating, cooling or hot water to customers who had previously been disconnected.
- A2.8 **Repayment plan** – A repayment plan is an agreement that allows customers to pay off their debt in instalments over time.
- A2.9 **Self-disconnection** - means when a Domestic Consumer uses a Prepayment Meter and experiences an interruption to their supply of heating, cooling or hot water because the credit on the meter has been exhausted
- A2.10 **Shared Ground Loop** - Where 2 or more properties are heated by individual ground source heat pumps connected to it.
- A2.11 **Vulnerable customer** - means where the personal circumstances and characteristics of a person create a situation where he or she is:(a) significantly less able than a typical person to protect or represent his or her interests; and/or (b) significantly more likely than a typical person to suffer detriment or that detriment is likely to be more substantial;