<p style="text-align:center">Heat Networks Regulation
Registration guidance
Response from The Heat Network
December 2025</p>

The Heat Network is a peer group of social housing providers who meet to discuss and share good practice about district and communal heating. We bring together our own communal heat experiences and share the lessons we've learnt with colleagues across the sector. We have 41 housing association and local authority members who directly manage around over 125,000 homes on over 3,000 networks – around 25% of the UK total – and are responsible for many others on third party heat networks (eg ESCOs and s106 schemes). We are supported by the National Housing Federation, the Chartered Institute of Housing, the Local Government Association, the National Housing Maintenance Forum and Community Housing Cymru.

To discuss our consultation response further please contact Rachael Mills, Secretariat, rachael.mills@se-2.co.uk

1. **Do you agree with the proposed guidance for the scope of heat networks regulation?**
   The section in the guidance explaining the scope of heat networks regulation is very useful. Ofgem may want to consider including this section with other guidance (eg reporting) or having it as a standalone document once the registration process is complete (ie at the end of the first part of the Initial Period).

   There will be lots of complexities in practice regarding regulatory responsibility between operators and suppliers where they are separate entities. In the social housing sector, there are many different contractual combinations of where responsibilities start and stop in bulk supply, managing agent and ESCo schemes. Adding in examples as they come to light would be very helpful.

2. **Do you agree with the proposed guidance for registering a heat network?**
   The proposed guidance for registering a heat network is very helpful, although no doubt further iterations will be required once it starts getting used in practice and frequently asked questions arise.

   It's really important that as much is done as possible to pro-actively raise awareness of the registration (and reporting) process and what information will be required. There is a real risk that many heat network operators/suppliers in the housing sector will not register until near the deadline, leading to a late flood of registrations for Ofgem to process and difficulties in back-dating reporting. Reasons for this include:
   - They don't know they have a duty to do so
   - It will take them a long time to collate the information required
   - Site visits may be required in some circumstances (eg technology, number of connected buildings, heating capacity)

- Lack of clarity on the SMRI role, leading to internal questions, sign off and delay
- Time required to set up a PSR and confirm how many vulnerable customers live on each heat network

Members of The Heat Network have requested that a bulk upload function be built into the registration digital platform for data at the heat network level. Many local authorities and housing associations have more than 50 heat networks – some have more than 200 and at least one has 700+ schemes. Entering data for these one at a time will be a huge resource sink.

Para 3.24 states "Suppliers cannot complete registration until they are invited to do so. The obligation for the supplier to register is not triggered until the operator has completed their submission." There is a risk that (where the operator and supplier are different entities), the operator will register so late there isn't time for the supplier to register before the January 2027 deadline. We would therefore like to see a function on the registration digital platform whereby a supplier can notify Ofgem that they are ready to register ahead of the operator registering. This would also help to give visibility to Ofgem of operators that still need to register and allow proactive engagement.

3. Do you agree with the proposed guidance for heat networks with multiple operators?
   This guidance seems sensible, although again there will be lots of complexities in practice once registrations begin. Adding in examples as they come to light would be very helpful.

   Ofgem may want to consider including this section with other guidance (eg reporting) or having it as a standalone document once the registration process is complete (ie at the end of the first part of the Initial Period).