Heat Networks Regulations: OFGEM Registration Guidance

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Heat Networks Registration Guidance

Introduction:

Ofgem published its heat networks registration guidance on 23 January 2026. The guidance explains which heat network operators and suppliers must register, how regulated roles should be identified, the information required during registration and the arrangements that apply where networks have separate or multiple operators.

It applies to authorised persons operating or supplying a relevant heat network during the first part of the initial period, which runs from 1 April 2025 to 27 January 2027. It supports compliance with authorisation condition A4: Registration and, for networks with multiple operators, authorisation condition A5: Nominated Operator.

Operator and supplier roles:

Operator:

The entity controlling the transfer of thermal energy and exercising substantial control over long-term reliability, efficiency, compliance and significant infrastructure decisions. Asset ownership may be relevant but is not conclusive.

Supplier:

The entity responsible for commercial arrangements with customers, including setting charges, issuing bills, customer service and complaint handling. The supplier is expected to have a contractual or other agreement with customers.

In leasehold arrangements, the freeholder will often be the operator, although responsibility may differ where a Right to Manage company or Residents' Management Company has control. The specific management arrangements should be reviewed.

Who needs to register?

Operating a relevant heat network and supplying heating, cooling or hot water through a relevant heat network are separate regulated activities. An organisation may undertake one role or both. Each party should assess its activities carefully because its role determines the information it must provide and the authorisation conditions that apply.

- Operators and suppliers that began regulated activity before 1 April 2025, or during the first part of the initial period, benefit from deemed authorisation but must register by 26 January 2027.
- Where one entity operates and supplies the network, that entity completes the full registration.
- Where operation and supply are undertaken by separate entities, the operator submits first and identifies the supplier. The supplier is then invited to complete its part of the registration.
- Where there are multiple operators, the parties may agree that one operator will submit registration information on behalf of the others. Each operator remains responsible for its own regulatory obligations.

What is a relevant heat network?

The framework applies to relevant heat networks in England, Scotland and Wales. A relevant heat network is either a district heat network, supplying two or more buildings, or a communal heat network, supplying a single building divided into separate premises. The definition can include systems that rely wholly or partly on heat pumps specific to the buildings or premises served.

Connected and embedded heat networks are treated as separate relevant heat networks. Each network must be individually authorised, even where the same entity operates and supplies both. Physical boundaries, such as a building or site meter, will generally help define regulatory responsibility.

Exemptions and reduced obligations

Certain arrangements are outside scope or expressly exempt, including qualifying houses in multiple occupation with shared kitchen or bathroom facilities and shared heating, and certain converted buildings served by a single domestic-capacity appliance of 45 kW or less. Converted blocks containing self-contained flats are not covered by the HMO exemption merely because they are HMOs.

Third-party waste heat producers, such as data centres or wastewater treatment sites, will generally not be undertaking regulated activity solely by producing waste heat. The authorised person will normally be the entity distributing heat and responsible for the energy centre, reliability and any necessary backup or upgrading infrastructure.

Self-supply, industrial and Shared Ground Loop heat networks remain within scope and must register, but reduced information and regulatory obligations may apply to them.



Who registers, and who is exempt?

1. **Operator and supplier are the same**

   Completes the whole registration.

2. **Separate operator and supplier**

   Operator registers first and invites the supplier, which needs its own account.

3. **Several operators**

   May agree one nominated operator to register; each stays responsible for its own obligations.

4. **Consultant support**

   The client's regulatory contact adds us as a user to act on their behalf.

Sources: Ofgem heat networks registration guidance (January 2026); DESNZ HNTAS consultation and draft Milestone 2 specifications (January 2026).
Note: HNTAS timescales proposals are subject to change.

Exempt (no application needed)

HMOs
with shared kitchen/bathroom and shared heating

Converted buildings
on one domestic appliance ≤ 45 kW

Not exempt

Blocks of self-contained flats

26 Jan 2027

Registration deadline for existing networks. Self-supply, industrial and shared ground loop networks still register, with fewer questions.

How registration works

Registration is completed through Ofgem's digital service. It enables Ofgem to identify authorised persons and their networks, gather essential information and establish a compliance baseline. Declaring non-compliance does not prevent registration.

- A regulatory contact must be nominated. This should ideally be the most senior person responsible for heat network operations and compliance.
- The regulatory contact controls account permissions, may invite additional users and remains ultimately responsible for the accuracy and completeness of submitted information.
- Registration is complete once all required information has been submitted. It is not an assessment or approval process.
- Ofgem will issue an email acknowledgement and a unique ID for each registered heat network. The ID should be retained for future correspondence.



Information required for registration

Organisation-level information is provided once for each authorised person. Separate operators and suppliers each provide their own organisation information. Portions of this data required for registration will be found in the submissions previously made to OPSS, however some data is new to the registration in alignment with new aspects of the regulations.

- Organisation type, company or organisation details and group or parent-company structure.
- Financial resilience indicators.
- A declaration relating to people with Significant Managerial Responsibility or Influence, including confirmation that fit-and-proper policies and assessment procedures are in place. Declarations remain current for three years.
- The regulated activities undertaken by the organisation.

Network-specific information is divided between operator and supplier responsibilities:

- Operator information: network location, number of buildings served, communal or district configuration, embedded communal networks, energy source and technology, energy-centre details and heating capacity.
- Supplier information: numbers and types of domestic and non-domestic customers, including whether any non-domestic customers are small business or microbusiness consumers.
- Both operator and supplier: confirmation that a fit-for-purpose continuity plan is in place by 26 January 2027 and that suitable complaints arrangements are available.
- Domestic suppliers: confirmation that a Priority Services Register, or accepted equivalent, is operational, together with information on customers in vulnerable situations.

Shared Ground Loop heat networks

The registration questions for Shared Ground Loop networks are adapted to reflect their particular design and charging structures. Ofgem distinguishes utility, non-utility and small private Shared Ground Loop models. Co-located systems that are not physically connected may be included in one registration where they are managed as a single entity.

Multiple operators and the nominated operator

Where multiple parties operate different parts of the same heat network, they must use reasonable endeavours to agree a nominated operator to act as the main contact with Ofgem. The nominated operator must relay information and notifications promptly between Ofgem and the other operators, while the other operators must provide information reasonably required for this purpose.

The nominated operator acts as the coordination point only and does not assume regulatory liability for the acts or omissions of the other operators. Other operators may still need to use the digital service for ongoing requirements, including financial resilience and fit-and-proper information.



What happens after registration?

- Ofgem will publish a list of authorised persons, the regulated activities they undertake and the geographical location of their heat networks.
- Operators and suppliers must continue to comply with all authorisation conditions relevant to their activities, including consumer protection requirements before and after registration.
- Authorised persons will be required to submit monitoring information through regular data reporting.
- Future engagement with the Heat Network Technical Assurance Scheme (HNTAS) and Technical Specifications (TS) are expected, following a successful pilot of the application of the processes on real networks earlier this year.

What should organisations do now?

- Create a complete inventory of district, communal, connected and embedded heat networks.
- Identify the operator and supplier for each network and document the basis for those role assessments.
- Confirm exemptions or reduced-obligation classifications and retain supporting evidence.
- Appoint a senior regulatory contact and identify who will prepare and approve registration information.
- Gather organisation, ownership, financial resilience, technical, customer and vulnerability information.
- Prepare or review the continuity plan, complaints procedure, fit-and-proper arrangements and Priority Services Register where applicable.
- Agree registration sequencing with separate suppliers and nominate an operator where multiple operators are involved.
- Complete registration by 26 January 2027 and retain each network's confirmation and unique ID.

What clients need to gather before 26 Jan 2027

Register online via GOV.UK One Login and Ofgem's heat networks digital service. No documents are uploaded, but declared policies must exist. Old Metering & Billing notifications do not count.

1: Organisation (once)

- Organisation type, legal name, Companies House no.
- Group structure incl. parent companies
- Financial resilience indicators (accounts, insurance)
- Regulatory contact: most senior heat network lead
- Fit and proper (SMRI) procedures
- Work email for each user (GOV.UK One Login)

2: Each network (operator)

- Network name and site address
- Communal or district network
- Number of buildings supplied
- District only: embedded communal networks + who runs them
- Heat source, technology and capacity (kW)
- Energy centre details: plant, ages, metering, controls

3. Customers (supplier)

- Network name and site address
- Communal or district network
- Number of buildings supplied
- District only: embedded communal networks + who runs them
- Heat source, technology and capacity (kW)
- Energy centre details: plant, ages, metering, controls

4: Policies to confirm (both)

- Continuity plan if operator or supplier fails
- Complaints procedure: accessible, fair, timely
- Billing practices meet authorisation conditions
- Material Asset Register of critical infrastructure

Sources: Ofgem heat networks registration guidance (January 2026); DESNZ HNTAS consultation and draft Milestone 2 specifications (January 2026).
Note: HNTAS timescales proposals are subject to change.

Organisations that are both the operator and supplier of a district heat network site (a district heat network plus any communal heat networks connected to the district heat network), and that also operate and supply at least one of those embedded communal heat networks, can register in most cases. Ofgem is updating the registration process at the time of publication, please check relevant guidance for the latest position.

Key takeaways

Registration is not simply a network-notification exercise. It requires organisations to identify the correct regulated parties, understand the boundaries between connected networks, assemble technical and customer information, and confirm that core governance and consumer-protection arrangements are in place. Registration is the starting point for ongoing compliance, not an approval of compliance by Ofgem.

This publication provides a high-level summary and is not legal advice. Organisations should refer to Ofgem's registration guidance, the Heat Networks (Market Framework) Regulations 2025 and the applicable authorisation conditions when determining their duties.

Inspired's experienced Heat Networks team can support you throughout the Ofgem registration process. If you have any questions or require further support, please contact your Account Manager or dedicated Inspired point of contact.




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