



Together to Zero

Fair Pricing Consultation Response

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Fair pricing framework

1. Have we identified the right set of fair pricing consumer objective, principles and outcomes and are these properly defined? If you disagree with this proposal, please specify what changes you would like to see and provide a justification.

We do not agree with all elements of the proposal.

We broadly agree with the consumer objectives. Our concern is around the additional administrative burden that the policies will place onto heat network operators, increasing the cost of supplying heat.

There is a duplication of regulation across both zoning requirements, HNTAS and Ofgem pricing regulation. We would like increased guidance from Ofgem on how 'implementing technical efficiencies' will be assessed as providing an 'appropriate quality of service'. We need to see more clearly designed roles and responsibilities split between HNTAS and Ofgem.

2. Do you agree with our proposals to develop the fair pricing guidance in relation to the principles (please note that questions on cost allocation proposals, including guidance, are asked separately under Chapter 3: Cost allocation). In particular:

Have we identified the right areas to be covered by the guidance implementing the fair pricing principles (see paragraph 2.53 for a summary of the areas we are proposing to develop in guidance under each principle)? If you disagree with this proposal or think other areas should also be included, please specify what changes you would like to see and provide a justification.

Do you agree with the specific proposals to develop each of these areas in guidance? If you disagree, please specify what changes you would like to see and provide a justification."

We agree.

3. Do you agree with the proposed 'fairness test'? In particular:

Do you agree with the high-level features of the fairness test (principle based, reasonableness, case-by-case basis, and objectivity)?

Do you agree with our proposals to implement the fairness test discussed in Appendix 1: Fairness test?"

We do not agree. The proposed approach is overly complex.

Ofgem should introduce a simple threshold approach for proportionate pricing across a segmented market, which is set by low-carbon counterfactual external benchmarks. Where prices are being charged above this threshold, then Ofgem should undertake further investigation based on the methodologies set out in this paper, such as the sharing of EBIT data. Where essential to test the fairness of a tariff which breaches counterfactual thresholds, EBIT may not be the appropriate metric; debt repayment and investor returns, including recognition of long term repex investment, must be included in consideration of financial sustainability.

4. Does the revised authorisation condition, 'fair pricing', reflect the policy intent?

Yes.

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5. In relation to market segmentation (please note that we are asking in relation to the considerations discussed in paragraphs 2.58-2.61, segmentation considerations in relation to price benchmarking are considered under Chapter 4: Price comparison and benchmarking methods):

Have we identified the right characteristics for market segmentation, and are these correctly defined?

Do you agree with the segmentation approach discussed for each of these characteristics?

The segmentation approach for tenure types is not particularly instructive. We commonly see heat customers in rented properties being apportioned lifecycle costs in their bills, as housing developers do not want to allocate costs in service charges. This needs to be a strengthened requirement to protect renters and provide clarity. We have seen strong pushback from private rental landlords who feel their tenants can pay all associated charges, including lifecycle, replacement, and O&M costs.

We agree that the data collection for existing networks should be proportionate, noting that there will be additional reporting under zoning and HNTAS requirements.

Segmentation for district vs communal networks needs to consider capital cost recovery in more detail. District networks typically model returns over 40+ years, which needs to be reflected in policy outcomes.

We strongly agree that pre-legislation networks have a longer transition period for data reporting requirements. Networks that are currently under construction and development will have these requirements built into their data collection infrastructure. For existing networks, this will require retrofitting for many networks (not just our own).

There is insufficient detail shared on how heat network zoning may impact Ofgem's implementation of the fair pricing framework. There should be no divergence in zoning policy, as this creates unnecessary layers of complexity that inhibit infrastructure investment without additional associated benefits for the customer.

6. Of the information listed in Table 3 below, what do heat networks already regularly collect and can be easily reported?

We currently collect data on all items in the table. However:

1. Charges – we have detail of what we charge i.e. connection charges, standing, and unit charge rates for standard customer groups and connection types.
2. Prices – our financial reports do not currently split out how much has been billed out and collected in total by standing charge vs unit charges etc. We have an overall billed figure. We have detail of customer numbers and annual demand and reference prices. Data is available but would need manipulation to do the average annual customer bill for example or based on consumption levels.
3. Cost allocation – this is reflected in our charge rate calculations as far as is reasonably possible, recognising that fixed operating costs evolve as networks expand and mature. These calculations also account for the need to recover capital investment, plan for future lifecycle replacements, and ensure appropriate returns over the full life of the network.
4. Cost drivers – this can be collected but it is important to keep these simple and focused on key network performance and cost drivers, and not get lost in detail.
5. Financial data – collection of this data needs careful consideration, and we believe should be by exception as noted above. Simple EBIT margins are unlikely to provide a useful metric, as noted above.

7. Of the information listed in Table 3 below, which items would be more challenging for heat networks to report?

The areas that will be challenging for networks to collect data and report on will be:

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1. Cost allocation – particularly the overview of costs recovered through standing charges vs unit charges. If a network is fully compliant with fair pricing structures, it is unnecessary to report on these costs separately.
2. Connection charges – these will evolve as the network expands. Many connections that we are engaged with on growing networks request alternate connection charges, reducing upfront cost and paying off through increased standing charges.

It will also depend on who the heat supplier is and how they are billing their customers, or what systems are in use to extract this data. Without a standard approach in the market, there will be discrepancies on the granularity of data.

8. Of the cost drivers listed in Table 7 (in Appendix 3), which items would be more challenging for heat networks to report?

1. Fuel input price could be challenging if you start to get into basket or flex procurement
2. Network length in meters is not always readily available or a simple metric that the network operator has in useable format
3. Network generation would require clear definitions to make this possible
4. Number of customers would need clarification; we would deem this to mean the blend of number of domestic and non-domestic connections. Clarification is needed on this point.
5. Age and type of properties will not always be in the heat supplier's information, e.g. EPC certificates. We'd need to set a realistic standard in terms of detail.

9. Should certain types of heat networks have more limited data reporting requirements? If so, which heat networks should these reduced requirements apply to, and what data should they be exempt from reporting?

A heat network should be treated equally and fairly for the benefit of the consumer. Looking across the market, there are common themes and assurances needed regardless of it being a full ESCo, council-supplied. or Developer / Management Company-led.

Some of this information wouldn't necessarily be applicable, i.e. Connection Charges, but if the information is to be collected and deemed useful enough for some heat suppliers to report on, then it should apply to all.

All heat networks should have more limited data reporting requirements, unless disproportionate pricing or consumer detriment has been identified that requires additional investigation by Ofgem.

All consumers connected to heat networks should benefit from equal standards and requirements. Limiting the data reporting requirements disproportionately will create disparity across consumer experience and outcomes, conflicting with the overall policy intent.

Cost allocation

10. Do you agree with our proposed prescriptive rule that GSOP payments, compensations, fines, penalties and other redress provided to consumers should not be passed through to customers?

Agree

This will need a level of management though, as where heat suppliers are Management Companies, unless the Managing Agent is expected to take the 'pain' on these arising, they can't have a hole in the Management Company accounts. It needs further consideration.

11. Do you agree with the draft best practice guidance provided? Is there anything that should be added? Should any of the best practice guidance be strengthened to prescriptive rules?

Agree

12. Do you think that the best practice approach to cost allocation should differ for different types of heat networks, or different types of suppliers? If so, for which types and how?

No, the best practice approach should be high level only.

13. Does the authorisation condition, 'cost allocation', reflect the policy intent?

Agree

14. What other feedback do you have on the proposed approach to cost allocation?

It will be important to recognise that some non-domestic customers may wish to pay a lower connection charge, with the additional ESCO investment repaid over time via a supplemental fixed charge / financing charge. This flexibility of approach to meet customer needs should not be constrained or prevented by regulation.

Price comparison and benchmarking methods

15. Do you agree with our proposed approach for defining heat network prices in a comparable way? Are there any other ways to define price that we should consider?

We broadly agree with the proposed approach to defining heat network prices in a comparable way by focusing on whole cost to the consumer, rather than just unit rates. However, we believe there are several other factors necessary to make fair comparisons.

1. Connection Size vs Consumption

While usage in kWh/year is a useful standardising metric, it is missing the connection size. Connection charges and fixed charges are typically based on capacity (kW), and some customers — such as stadiums or event venues — may have high peak demands but low total consumption. Any price comparison should consider both connection size (kW) and consumption (kWh) to reflect true costs.

2. Commercial vs Domestic Customers and Entity Roles

Separating operators (bulk heat providers) and suppliers (retail heat) is sensible, but current proposals give limited attention to commercial customers. Whilst this is not fully in the scope of the consultations, commercial customers make up an increasing portion of customers on heat networks and will be keen to compare against market prices.

Operators and suppliers should be benchmarked separately, with separate methodologies. Having these as two-stage calculations is preferable to simplify reporting.

3. Tariff Type and Carbon Credentials

There is increasing tariff variation in the market — particularly where suppliers differentiate between high-, low-, and zero-carbon heat. Price comparisons should include an explicit carbon context. Clear definitions of low- and zero-carbon is needed and should be aligned with GHNF standards and Zoning regulations. This will avoid misleading cost comparisons between networks with different carbon intensities.

4. Variable Costs and Loss Normalisation

Variable charges should be benchmarked on a like-for-like basis. For suppliers, this means accounting for secondary network losses. If the benchmark heat pump assumes 100 W/unit delivered but a real-world performance frequently see >100 W/unit losses due to poor installation. Whilst excessive losses should be flagged and suppliers pushed to make changes, losses close to 100 W/unit should be credited. Benchmarks should reflect actual secondary loss rates or be adjusted accordingly.

5. Operator Heat Supply Technology Differences

Operators using alternative heat sources like waste heat (e.g. from data centres) may have lower costs than those using ASHPs. However, if an operator prices based on ASHP performance (e.g. to futureproof for future expansion), this should be transparently recognised in comparisons. Technology-type should be a normalised cost driver or explicitly controlled for.

6. Motivational Pricing and Energy Services

Some suppliers may incorporate energy service elements and motivation pricing (e.g. demand management or incentivising lower return temperatures through partial volume-based charging) into their pricing. These should be excluded or standardised in any benchmarking framework to allow like-for-like comparisons of underlying heat costs.

7. Fixed and Connection Charges Breakdown

Supplier fixed charges often cover standing charges, billing, and customer services. Operator fixed charges are commonly set at £/kW/year. Non-standard connections (e.g. those requiring tunnels or additional low-carbon kit) may incur additional charges priced on a fair basis.

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Connection charges can vary:

- Bulk supply is typically priced at £/kW, with uplifts for complexity.
- Retail supply connections may be £/unit, with variation depending on whether the developer or supplier funds the secondary network.

16. Do you agree with our proposal to use gas boilers and heat pumps as external reference benchmarks?

There is significant ongoing work in this area, and it's essential that any benchmark is based on realistic and deliverable assumptions. In our experience, we frequently see Air Source Heat Pump (ASHP) counterfactuals use early-stage cost estimates that are far below what is achievable in practice — particularly where these assumptions are made by designers without direct delivery experience.

We strongly recommend that Ofgem aligns its ASHP counterfactual assumptions with the work being developed by WSP and the ADE for DESNZ. This work has been shaped by extensive industry engagement and reflects practical delivery experience. While there are still areas that need strengthening — particularly around operating costs — the approach is moving in the right direction and better represents real-world costs.

17. Do you agree with the proposed method for calculating a heat pump benchmark, including the key input parameters outlined? Are there any additional factors that should be considered to ensure a robust heat pump benchmark?

We broadly accept the proposed method for calculating heat pump benchmarks. There are several inputs that require refinement to ensure robust like-for-like comparisons.

1. Seasonal Coefficient of Performance (SCOP)

SCOP assumptions must reflect real-world seasonal performance, not manufacturer data. The CCC report cited does not provide specific SCOP values. Tools like energyPRO can accurately model COP variation with temperature, which is crucial for reliable benchmarking.

In practice, commercial heat pump suppliers rarely guarantee performance in their specifications and do not reflect cold plume recirculation which is common in poorly designed installations.

Typical SCOPs for LTHW heating system temperature building-scale heat pumps are in the range of 2.12–2.31 (212–231%). These can be higher for low-temperature systems. The benchmark must therefore ensure SCOPs realistically reflect system design intent and anticipated actual in use performance.

2. Replacement Costs

More clarity is needed on the treatment of replacement costs. The consultation says that “upfront costs should be annualised over the expected lifetime,” but it's unclear whether this includes initial installation only, or also future replacements.

Heat networks include equipment replacement costs within their fixed charges on a whole life basis to avoid customer inequality or pricing checks over time. For like-for-like comparison, whole life replacement costs must be included in the heat pump benchmark as well.

3. Maintenance Costs

Heat networks typically provide comprehensive service levels — including callouts, emergency recovery, scheduled servicing, heat supply resilience, disaster recovery and full lifecycle replacement.

This exceeds the service scope that we commonly see considered for standalone ASHP solutions, where often only short-term planned maintenance is allowed for, with many of the true whole-life costs being omitted. Benchmark costs must account for this difference for all scales of installation and ensure a consistent whole-life comparison is made.

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All costs through to heat delivery should be considered where appropriate. For example, typical “5th generation ambient” communal heating solutions typically place the responsibility for supply electricity to and maintaining and replacing (capital intensive) WSHP’s within individual properties with domestic customers. Counterfactual costs should therefore consider whole system costs to end users and ensure such end user costs are not hidden.

4. Input Electricity Costs

Heat networks often benefit from on-site generation, private wire, or wholesale power purchasing. Therefore, operators/suppliers should be allowed to input a weighted average electricity price, supported by evidence.

The use of the domestic price cap may be suitable for residential customers but is not appropriate for commercial customers, which will make up the bulk of future connections. It would be useful to understand which electricity price (£/MWh) would be used for commercial comparators and it is important that this is realistic and compatible with the network tariff electricity input price.

5. ASHP-Related Ancillary Costs

Counterfactual benchmarks often underestimate the full capital cost of ASHP installations by omitting items or poor consideration of design or equipment specifications, such as:

- Electrical grid upgrades.
- On-site electrical infrastructure costs; HV, transformers, LV etc.
- Consideration of ASHP positioning and screening, and associated costs, to ensure good air flow and avoid cold air recirculation (and resultant poor performance and high customer cost).
- Noise and vibration mitigation measures; anti vibration mounts, acoustic screening are essential to meet building regulations.
- Structural supports to ensure correct placement of heat collection evaporation.
- Specification of high performance ASHP plant that performs with good efficiency and output across full operating ranges, and not specification of low-cost plant without consideration of performance under design conditions or use in real life.
- Ancillary electrical/control systems.
- Thermal stores and mechanical equipment.

According to ongoing work by WSP for DESNZ, these non-core items can account for 50–75% of total system cost. Ofgem should engage with DESNZ and WSP to align on a full, realistic cost basis.

18. Do you agree with the proposed approach to comparator benchmarking, and our list of potential cost drivers set out below and in Appendix 3: Cost driver? Are there any relevant cost drivers that we haven’t considered?

We broadly agree with the proposed approach to comparator benchmarking and the list of cost drivers outlined in Appendix 3. However, we believe a few key additions and reclassifications are needed to ensure a fair and complete analysis.

1. Carbon Intensity of the Tariff (Add – High Importance)

Carbon intensity of the tariff offered is missing. A gas-led tariff will have fundamentally different wholesale fuel costs compared to a zero-carbon tariff using REGO-backed electricity or sleeved PPAs. This directly affects the cost structure and should be treated as a high importance cost driver.

This distinction also relates to the treatment of sleeving arrangements under GHNF and Zoning. Hemiko would be happy to engage further on what these tariffs look like and the price difference between them.

2. Heat Generation Efficiency (Clarify – Medium or High Importance)

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While we acknowledge that efficiency may be partially captured via technology and fuel type, it should be explicitly listed as a cost driver in its own right.

Operational efficiency — including thermal losses— has a clear engineering and economic rationale and should be reflected in the cost drivers.

3. Operating and Return Temperatures (Reclassify – High Importance)

Operating temperature should be treated as a high importance factor. A 5°C increase in flow temperature can reduce a heat pump's SCOP by up to 20% materially impacting efficiency and energy costs.

Similarly, return temperature, often measured via VWART (volume-weighted average return temperature), can have a material impact on system performance for both gas and electricity led schemes.

4. Network Losses (Reclassify – Medium Importance)

We recommend distinguishing secondary (internal) network losses from primary ones. Losses in secondary networks can vary widely depending on building layout, designs and installation quality. These should be included as medium importance to be reported by suppliers, as they directly affect the heat purchased to deliver a unit of heat to a residential customer.

19. What is your view on the ease with which data could be reported on the four 'High Importance' cost drivers set out in paragraph 4.33? What information do heat network operators and suppliers already collect, and what would be challenging to provide?

We agree with the proposed data to be collected noting the answer to 3.18. All the data listed is available to report. Regression for gas-/low-/zero-carbon tariffs should use separate data sets.

20. What is your view on the ease with which data could be reported on the remaining 'Medium Importance' cost drivers set out in paragraph 4.33? What information do heat network operators and suppliers already collect, and what would be challenging to provide?#

We agree with the proposed data to be collected noting the answer to 3.18. All the data listed is available to report. Regression for gas-/low-/zero-carbon tariffs should use separate data sets.

21. What is your view on our proposal to publish a high-level methodology for each benchmark (once data is collected and methods have been tested), to provide an accessible overview of the approach?

We agree to the proposed approach. Please see answer to Q16 on the DESNZ/WSP/ADE counterfactual in development for the recommended methodology.

22. Do you have any other feedback on the proposed approach to price comparison and benchmarking?

We broadly agree with the proposed approach to price comparison and benchmarking. There are several emerging technologies that may be flagged as reasonable alternatives that have limited customer and/or carbon benefits.

Exhaust Air Heat Pumps (EAHPs) and bivalent ASHP/gas boiler systems are increasingly commonly proposed, particularly in new developments. However, both raise concerns regarding their carbon performance and real-world cost impacts.

EAHPs:

There is currently limited or no whole-system performance data available from manufacturers. Developers have recently come to frequently propose these systems without credible operational evidence of efficiency or customer cost. Results from field test seen by Hemiko suggests that actual heat recovery is significantly below manufacturer claims, stability of heat performance is poor, with direct electric top up required and customer costs are more consistent with fully electric systems than with efficient low-carbon heating.

Bivalent Systems:

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While bivalent systems (e.g. ASHP raising 50% of the temperature, gas boiler providing the remain) may appear cost-effective in counterfactual assessments, they are not genuinely low carbon in operation. In our experience, the ASHP is rarely used once installed, with the gas boiler providing most or all heat. As a result, these systems distort comparisons that do not factor in carbon intensity alongside price.

We recommend that any price benchmarking methodology clearly accounts for the operational carbon intensity of hybrid systems, and does not treat them as equivalent to fully decarbonised heat sources.

Profitability analysis

23. Do you agree with the proposal for ongoing monitoring of profitability through data collection on EBIT margins for all heat networks?

Hemiko does not agree with this approach. This approach is inconsistent with other regulated markets. It is unusual to collect EBIT margins on a network-by-network basis, and, if needed at all, should be on a company level. Collecting data on EBIT margins should be one of the options available to Ofgem for conducting further investigation where it identifies instances of disproportionate pricing through an initial stage of external benchmarking. Instead of profitability the focus should be on efficiency, and this should be managed by the HNTAS.

Profitability should not be assessed at the level of a single network, rather across a portfolio. Some networks are profitable in their current state, others are not. Organisations with a wide and varied portfolio of networks are able to spread out network profitability. The alternative would be to increase the tariff on poorly performing networks, causing customer detriment.

Assessing EBIT on a single network basis would also lead to cherry picking, with heat network investors only targeting well performing networks/areas with very high density. This will lead smaller/poorly performing networks to stagnate.

Finally, as noted a simple EBIT assessment does not recognise asset investment finance, debt interest and whole life network renewal costs and as such is not a sensible metric of heat network asset “profitability”.

24. How challenging would it be for heat network operators and suppliers to provide the data outlined for calculating EBIT margins? What barriers, if any, might affect the accuracy and completeness of the data?

These aren't unreasonable requests but entities would need to update their recording and monitoring of their costs to easily identify and allocate to specific networks to enable this reporting. There needs to be consideration into the administrative costs and burdens this will place on network operators, as well as of the usefulness of the data collected.

25. As data collection improves, do you agree that more in-depth profitability assessments, for example using Return on Capital Employed (ROCE), should be conducted for networks identified as outliers through benchmarking?

We agree with the view that those making high levels of returns (noting EBIT is likely not a good measure) or with comparatively high pricing could be a flag to warrant further investigation of more involved project performance data. This should be undertaken by exception and in a manner parallel with other utilities.

26. Do you have any other feedback on the proposed approach to profitability assessment?

Regulation should place focus on efficiency over profitability. This is best managed through the proposed HNTAS requirements, with the intent to ensure that customers are being charged a fair price for a quality service.

Central price transparency

27. What are your views on the three options? Please comment on each option in terms of the price information to be centrally published, how the price information is presented and what prices are compared to.

We do not fully agree with the proposal. We agree with the principle of a central pricing transparency, however the mechanics of how this can be achieved for heat networks is incredibly challenging.

Each network is incredibly nuanced and specific to the context it has been delivered in. Publishing this information on pricing risks creating a skewed public interpretation of pricing for different networks. Without the proper context, the way that heat price is derived will not offer a balanced representation of how pricing is derived. For example, Hemiko are currently delivering networks of similar size, scale and expansion potential at Greenwich, SWAN and OPEN. All 3 networks have clear similarities, but completely different pricing due to uncontrollable factors including:

- Delivery costs – network length and ground conditions significantly impact network pricing. This cannot be compared on a like for like basis.
- Heat source – All three networks use different heat sources for the initial energy centre, this cannot be compared fairly. Even with comparable heat sources – e.g. networks with river source heat pumps – river flow rates, ambient temperature and capacity will impact SCOPs, creating variance in pricing.
- Pricing structure – even across a single network we will have different tariff structures based on (1) carbon intensity (2) financing options for connection costs (3) sleeving solutions for low carbon connections and more.

Factors such as these will have an impact on pricing structures, but this will not be easily communicated to the general public in a pricing comparison. We do not believe this is equivalent with pricing requirements for gas and electricity markets and we fear that in practice it will be very difficult to provide a range of sensible central price compactors that customers can sensibly compare with their own tariff without generating a lot of confusion and potential for confrontation.

Of the three options proposed, we consider Option 2 (pooled market average) supplemented by the RAG ratings from Option 3 to be the most effective and user-friendly.

Option 2, using a pooled market average, provides the best foundation for accessible public comparison. This should be supplemented by the RAG visual system from Option 3 to enhance engagement and understanding.

Option 1, while analytically rigorous, is more suitable for industry benchmarking or analyst reporting — not for consumer-facing tools.

We encourage Ofgem to prioritise simplicity, clarity, and real-world user testing, particularly for the non-technical tier.

28. Do you think the options have the right balance between providing a good level of transparency, burden on consumers to interpret the information, risks of misinterpretation by consumers, disclosure of commercially sensitive information, and risk of price convergence?

The preferred option should be market tested on consumers, evaluating whether they can accurately interpret the data sets provided. Without proper context and understanding pricing for different heat networks will not be able to be evaluated to show whether heat is being charged at a fair price.

29. Do you support focusing on one option or a combination of options in paragraph 6.69?

Likely a combination of options will be required to capture the range of contexts, and the diversity of hat networks.

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30. Do you support the phasing in of the options described in paragraph 6.70?

We do believe that a phased approach should be used. This prevents a ‘bottleneck’ taking place for Ofgem assessments.

31. Do you support the adoption of different options for different heat network groups described in paragraph 6.71?

Adopting a diversity of different approaches to central price transparency risks adding further complexity from the perspective of the consumer.

32. Do you agree that central price transparency measures are unlikely to put additional administrative burden on heat networks in addition to data reporting for benchmarking? Do you have concerns on the administrative burden from any options?

This will certainly have an impact on the administrative burden and hence may increase cost to consumers. Some networks will have multiple tariff structures across a single network based on (1) low vs high carbon tariffs (2) some customers reduce connection charges by accepting higher standing charges (3) network phasing.

33. Do you think it is appropriate to link central price transparency with benchmarking?

While benchmarking and central price transparency are related, we believe they should be treated as separate tools with distinct purposes.

Benchmarking compares a network’s price against a technical counterfactual (e.g. a gas boiler or ASHP) and is primarily a tool for assessing fairness versus comparable technologies.

Central price transparency, compares prices across the market, giving consumers and policymakers insight into how one heat network compares to others.

These approaches are both valuable — but they reflect different reference points:

- Benchmarking = fair vs. counterfactual
- Transparency = relative vs. market

They may use similar inputs, but their value lies in serving different audiences and different regulatory objectives. We recommend keeping them as separate, clearly defined tools, while allowing them to cross-reference each other where helpful.

Price investigations

34. Do you agree with the approach to price investigations set out so far? Please provide reasons and views to support your response.

We agree with the principle, but in practice this will not be practical. The level of data required and administrative burden will be highly prohibitive. Any solution should be able to be implemented across all network types and ownership status, and in line with other utilities.

We want to know how the investigation will be assessed and what the outcomes and measures will be following investigation.