



# Supplier Performance Report

## Low-carbon energy and social schemes

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1 July 2025 to 31 December 2025

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## Foreword

Ofgem administers 13 low-carbon energy and social schemes, on behalf of the UK Government, with a combined value of more than £13 billion. These schemes are delivering real benefits by supporting the UK's decarbonisation efforts and providing support to vulnerable households to help tackle fuel poverty. As they are funded by the public, it is essential that every pound spent delivers value for money.

Energy suppliers play a critical role in delivering many of these schemes and we are committed to working in partnership with them to deliver positive outcomes for consumers. Their performance directly impacts how well scheme objectives are met and whether value for money is achieved. The Supplier Performance Report (SPR) highlights the progress suppliers have made in meeting scheme obligations and provides a transparent view of areas where further improvement is needed. From data quality issues to missed payments, it supports accountability and ongoing improvement across the sector.

We monitor supplier compliance through proactive engagement, data analysis and audits, working with suppliers to identify and resolve issues early, escalating cases for enforcement action where necessary. This reporting period shows continued progress, with a 49% fall in the more significant 'Level 1' non-compliances compared to the previous period, and the lowest level since January to June 2023. While this is positive, there remains more to do as 'Level 1' incidents have continued to occur across supplier scheme engagement, data submissions and payments. We will continue to work with suppliers to address these areas and support further improvement. We have clear expectations of suppliers and work closely with them to identify and address issues as they arise. We do this through collaborative engagement, including site visits, bilateral meetings and in-depth analysis of specific issues. This enables earlier identification of issues and more effective resolution.

In this edition of the SPR, we include a compliance spotlight on the Central FIT Register (the database of installations on the Feed-in Tariffs (FIT) scheme). This highlights our

recent work auditing suppliers on the FIT scheme, focusing on the accuracy and governance of the data underpinning the scheme. I am encouraged to see that the findings overall are positive. Where issues were identified that required further engagement, we met suppliers in person and were able to find quick and efficient resolutions to our concerns.

Since its inception, the SPR has driven strong engagement and provided real value to stakeholders. We recognise the feedback received from suppliers and other stakeholders on the value it provides and how it could be improved. In response, we are reviewing the content and presentation of the report, with the aim of ensuring future versions are clearer, more meaningful, and better support both transparency and continuous improvement across the sector.

Alongside this, we are evolving our wider approach to compliance through the introduction of the PACT (Predictable, Agile, Collaborative, and Technology-enabled) framework. This strengthens how we work with suppliers, combining clear expectations with more proactive and collaborative engagement to identify and resolve issues earlier, while maintaining a firm approach where obligations are not met.

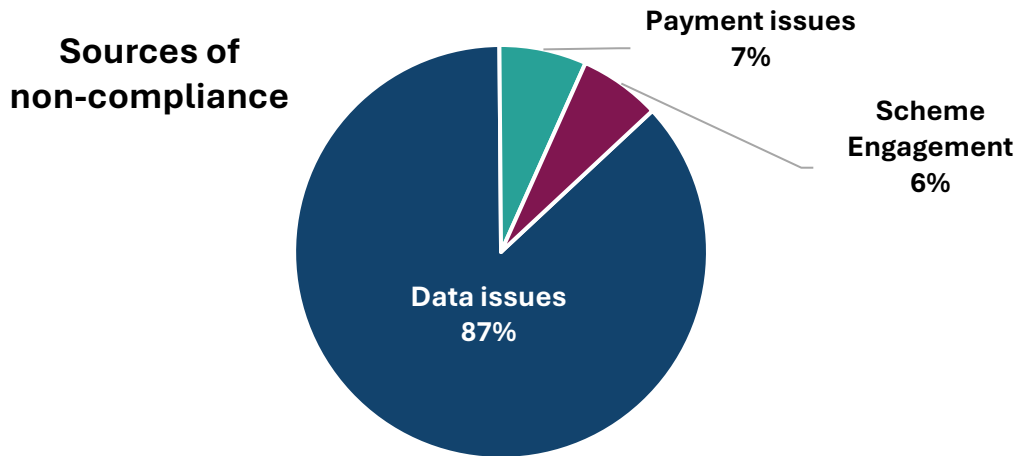
Through these changes, our aim is to support better outcomes for consumers by continuing to raise standards while strengthening our collaboration with suppliers.

If you wish to be kept informed about our plans to evolve the SPR, or have feedback on the report more generally, please email us: [schemesreportingfeedback@ofgem.gov.uk](mailto:schemesreportingfeedback@ofgem.gov.uk)

**Neil Lawrence**

Executive Director, Delivery & Schemes

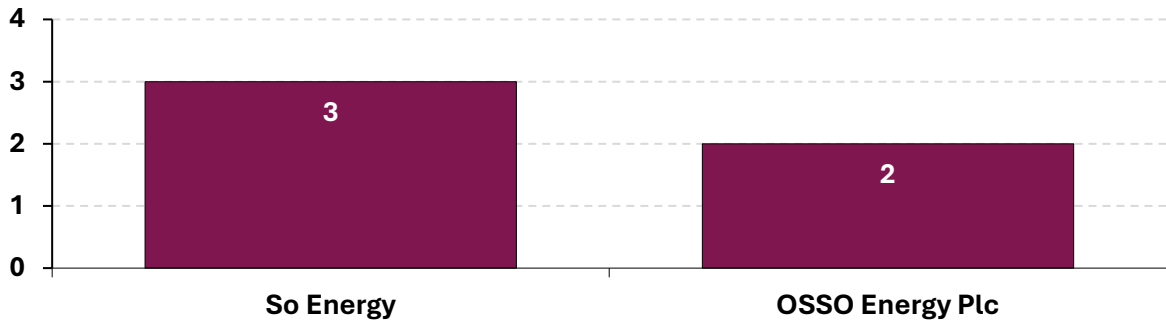
# Scheme non-compliance at a glance July to December 2025



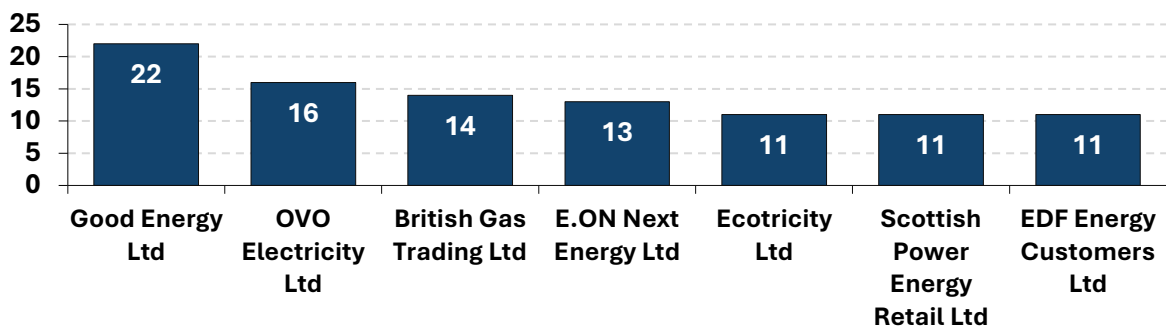
## Suppliers with the most non-compliance issues

The suppliers with the most 'Level 1' or 'Level 2' non-compliances over the period are shown here.

### Level 1 incidents



### Level 2 incidents



# 1. About the Supplier Performance Report

This chapter explains what the Supplier Performance Report shows, why we publish this information and what happens to the suppliers featured in the report.

## What does the Supplier Performance Report show?

1.1. The Supplier Performance Report (SPR) presents supplier performance against their obligations on the low-carbon energy and social schemes we administer. These schemes support decarbonisation and provide vital assistance to vulnerable consumers, making it important that suppliers meet their obligations. The SPR, which is published twice a year, helps hold suppliers to account by providing a regular and transparent view of their performance.

The schemes covered are:

- Energy Company Obligation (ECO)
- Feed-in Tariffs (FIT)
- Great British Insulation Scheme (GBIS)
- Green Gas Levy (GGL)
- Offtaker of Last Resort (OLR)
- Renewable Energy Guarantees of Origin (REGO)
- Renewables Obligation (RO)
- Smart Export Guarantee (SEG)
- Warm Home Discount (WHD)

- 1.2. It should be noted that this report records the number and type of supplier non-compliance incidents on the schemes listed above. It does not reflect a supplier's customer service<sup>1</sup>, wider performance (for example against other regulatory obligations), or its energy mix<sup>2</sup>.
- 1.3. Scheme non-compliance occurs when obligations under the relevant legislation are not met. This may include, but is not limited to, failing to engage with their scheme responsibilities, missing a specified deadline, or providing inaccurate data to us.
- 1.4. The data used to inform this report has been published alongside the report on our website. More information about the schemes, and suppliers' obligations, can also be found on our website<sup>3</sup>.

## Why are we publishing this data?

- 1.5. Energy suppliers play an important role in the successful delivery of many of the low-carbon energy and social schemes that we administer. Where non-compliance occurs, it can affect the achievement of government policy objectives and increase the costs of scheme delivery, which can be passed on to consumers through energy bills or lead to increased costs for taxpayers. As the administrator, we are committed to ensuring the schemes operate effectively and deliver their intended benefits while minimising unnecessary costs.
- 1.6. Our schemes range from initiatives that encourage the uptake of renewable and low-carbon electricity and heat generation (key to achieving the UK Government's net zero targets) to programmes such as the Warm Home Discount (WHD) which provides financial support to support vulnerable consumers in fuel poverty.

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<sup>1</sup> [Information on supplier customer service performance](https://www.ofgem.gov.uk/energy-data-and-research/data-portal/customer-service-data): <<https://www.ofgem.gov.uk/energy-data-and-research/data-portal/customer-service-data>>

<sup>2</sup> Suppliers are required to publish details of their energy mix on their websites.

<sup>3</sup> [Environmental Programmes webpage](https://www.ofgem.gov.uk/environmental-programmes): <<https://www.ofgem.gov.uk/environmental-programmes>>

- 1.7. We therefore place significant importance on supplier compliance across these schemes. We publish this data to provide transparency to consumers and other stakeholders, signal our expectations to suppliers, demonstrate progress over time, and support accountability for performance.

## How do we engage and what happens to suppliers featured in the report?

- 1.8. Ofgem operates in accordance with our PACT behaviours; Predictable, Agile, Collaborative, and Technology-enabled.
- **Predictable** means that suppliers should understand the rules they are operating under.
  - **Agile** means we will engage with suppliers at an early stage where risks are emerging and respond to emerging issues proactively and at pace.
  - **Collaborative** means that we set clear standards and are firm with suppliers when performance falls short. We work with stakeholders to deliver the outcomes we want from our schemes.
  - **Technology-enabled** means that we use data to improve our visibility of supplier performance and use technology to support more effective, lighter touch regulation.
- 1.9. We are committed to working closely with suppliers to understand their operations and the challenges they face. Our aim is to deliver value for stakeholders by ensuring schemes operate efficiently and that scheme users have a positive experience when participating on our schemes. Where issues arise, we work with suppliers to support improvements and strengthen the effectiveness of scheme delivery.
- 1.10. Our approach focuses on early engagement, working closely with suppliers to understand issues in their full context and agree clear plans to address them. This includes picking up the phone and site visits to ensure we fully understand
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the situation and identify the most effective path to resolution. This approach has been a key focus for our scheme compliance teams. Recently, we have carried out in-depth site visits with a range of suppliers in relation to the Central FIT Register (CFR), alongside full-day, on-site workshops with most suppliers focusing on countering fraud across schemes.

- 1.11. We have also been working to increase the frequency of our meetings with suppliers, for example we established the ECO Quarterly Supplier Forum to make sure that compliance and delivery issues relating to the scheme are communicated effectively between Ofgem and obligated suppliers. The forum provides an opportunity to explore ways to mitigate risks and resolve issues.
- 1.12. Following a recent ECO Quarterly Supplier Forum, we reiterated our expectation that suppliers meet their ECO and GBIS obligations, alongside their wider regulatory responsibilities. We are receptive to exploring and enabling pragmatic approaches to delivering scheme targets where this can be done within the regulatory framework. Public reports showing supplier progress towards meeting their ECO obligations are available on the Ofgem website<sup>4</sup>.
- 1.13. We welcome suppliers taking ownership by putting forward solutions and setting ambitious timelines for resolving issues. Proactive and constructive engagement is the norm, which makes it easier for both parties to deliver our shared objectives.
- 1.14. We know many suppliers are highly committed to delivering positive outcomes for consumers and are working hard to do this. Where issues arise, we expect to see timely improvement, particularly where there are repeat occurrences or more serious instances of non-compliance, such as failing to meet payment obligations. In these cases, we may need to take further action, including referring matters for enforcement, which can result in financial penalties or, in

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<sup>4</sup> [ECO Public Reports and Data](https://www.ofgem.gov.uk/energy-company-obligation-eco/contacts-guidance-and-resources/eco-public-reports-and-data): <https://www.ofgem.gov.uk/energy-company-obligation-eco/contacts-guidance-and-resources/eco-public-reports-and-data>

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the most serious cases, licence revocation<sup>5</sup>. Details of enforcement outcomes may also be published on our website<sup>6</sup>.

- 1.15. As is right for any mature business, we expect suppliers to take findings of non-compliance seriously and to learn the lessons from both their own experience and the insights highlighted across the sector in this report. We expect that corporate boards, investors and creditors may carefully consider the information in this report and use it as an indication of a supplier's ability to manage risk, appropriately govern itself and deliver on its obligations more generally.

## Which suppliers are included?<sup>7</sup>

- 1.16. Non-compliance incidents tend to occur around certain compliance activities and deadlines which are not uniformly spread across the year. As this report covers the 6-month period from July to December 2025, when comparisons are made, we often refer to the equivalent period in 2024.
- 1.17. The focus of this report is on scheme delivery. Suppliers that were identified as having 'Level 1' non-compliances, and other suppliers with high volumes of less impactful 'Level 2' non-compliance, are highlighted in chapter 2 (**Suppliers with the most non-compliance**). All suppliers<sup>8</sup> that had a 'Level 1' or 'Level 2' non-compliance incident occur between 1 July 2025 and 31 December 2025 are represented in chapter 4 (**All non-compliances – Jul to Dec 2025**).

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<sup>6</sup> [Compliance and enforcement - Investigations, orders and penalties:](https://www.ofgem.gov.uk/energy-policy-and-regulation/compliance-and-enforcement/investigations-orders-and-penalties)

<<https://www.ofgem.gov.uk/energy-policy-and-regulation/compliance-and-enforcement/investigations-orders-and-penalties>>

<sup>7</sup> Obligations to participate in the schemes are placed on suppliers based on the number of customers they have. The threshold at which suppliers become obligated varies between schemes, and some schemes (such as the FIT) allow smaller suppliers to participate voluntarily.

<sup>8</sup> Charts and tables in this report record non-compliance under the name of the relevant licensee. The commentary in the report refers to suppliers by their name, rather than the licensee name to assist readability.

- 1.18. We highlight ‘Level 1’ and ‘Level 2’ incidents as these are incidents that could materially impact scheme outcomes if unaddressed. Level 1 incidents are those that could have an immediate impact on scheme outcomes, if unaddressed.
- 1.19. We recognise feedback received from suppliers and other stakeholders on the SPR, including how it is used and the value it provides. In response, we are reviewing the report and its presentation, taking this feedback into account to ensure future versions are clearer, more meaningful and better support transparency and continuous improvement. We will be engaging with stakeholders on the SPR ahead of the next SPR publication in December.
- 1.20. In parallel, we are evolving our wider approach to compliance through the introduction of the PACT framework. This strengthens how we work with suppliers by combining clear expectations with more proactive and collaborative engagement, enabling earlier identification and resolution of issues, while maintaining a consistent approach where obligations are not met.

## 2. Suppliers with the most non-compliance

This chapter presents information on the suppliers with the more significant ‘Level 1’ scheme-related non-compliance incidents, and those with high levels of ‘Level 2’ scheme-related non-compliance, occurring between 1 July and 31 December 2025.

### Scoring supplier non-compliance

- 2.1. Our aim is to deliver schemes efficiently, ensuring they benefit end users and support the UK’s decarbonisation goals. Achieving this relies on suppliers meeting the rules that underpin scheme delivery. We take a proportionate and pragmatic approach to non-compliance, working with suppliers to address issues quickly. We reserve consideration of compliance and enforcement action for the most serious cases of non-compliance.
- 2.2. The non-compliance incidents on the SPR database can vary significantly in seriousness and impact. Incidents are scored in 5 areas. Each incident is then given an overall grading as either a ‘Level 1’ or a ‘Level 2’ non-compliance. The 5 areas where each incident is scored are:
- Compliance with overriding scheme obligation
  - Deadlines
  - Governance
  - Accuracy of data
  - Financial implication

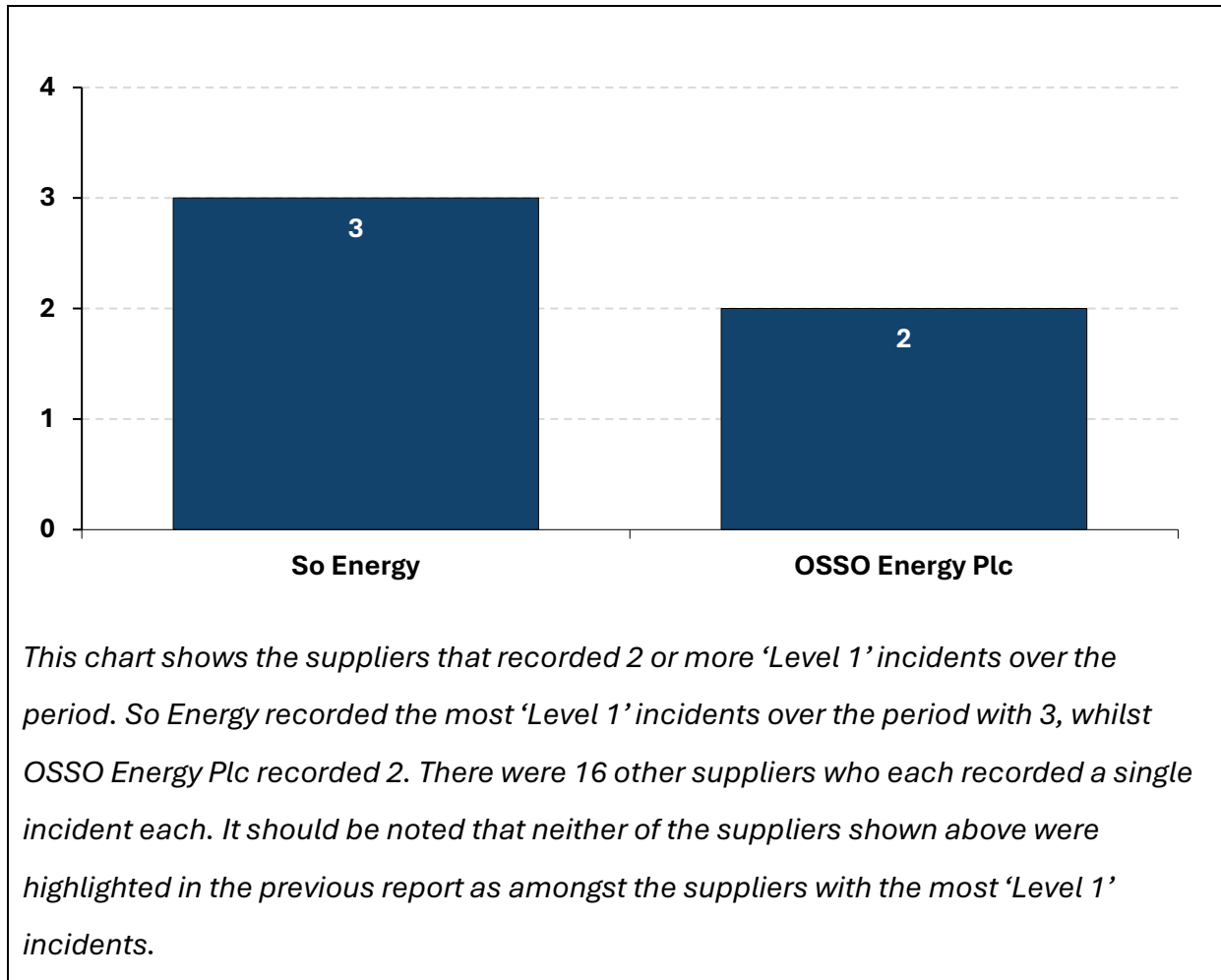
### Level 1 non-compliances

- 2.3. ‘Level 1’ incidents represent the more significant incidents of non-compliance. Such incidents have the greatest potential to negatively impact our ability to effectively administer and oversee these schemes. This can include the failure of a supplier to:

- Make a scheme payment
- Meet a scheme payment deadline
- Meet a scheme obligation target
- Provide critical scheme data on time

2.4. During the period 1 July 2025 to 31 December 2025, a total of 21 ‘Level 1’ incidents were recorded. This marks a 48% reduction from the 40 recorded over the equivalent period in 2024, and the lowest number since January to June 2023. The reduction reflects positive progress by suppliers, supported by our engagement to reduce the number of ‘Level 1’ incidents. We recognise and appreciate the suppliers who have engaged closely with us on this, helping to deliver improved outcomes across schemes. There is further progress to be made. While the number of ‘Level 1’ incidents has reduced, 21 incidents were still recorded during the period, across areas including data, payments and scheme engagement. Suppliers should consider the findings in this report and ensure appropriate processes are in place to minimise the risk of future non-compliance.

2.5. The suppliers responsible for the highest numbers of these 21 ‘Level 1’ incidents are named in **Figure 2.1** below. A breakdown of incidents by incident type is provided in **Figure 2.2**. Details of all suppliers with ‘Level 1’ incidents recorded over the period can be found in the dataset published alongside this report on our website.

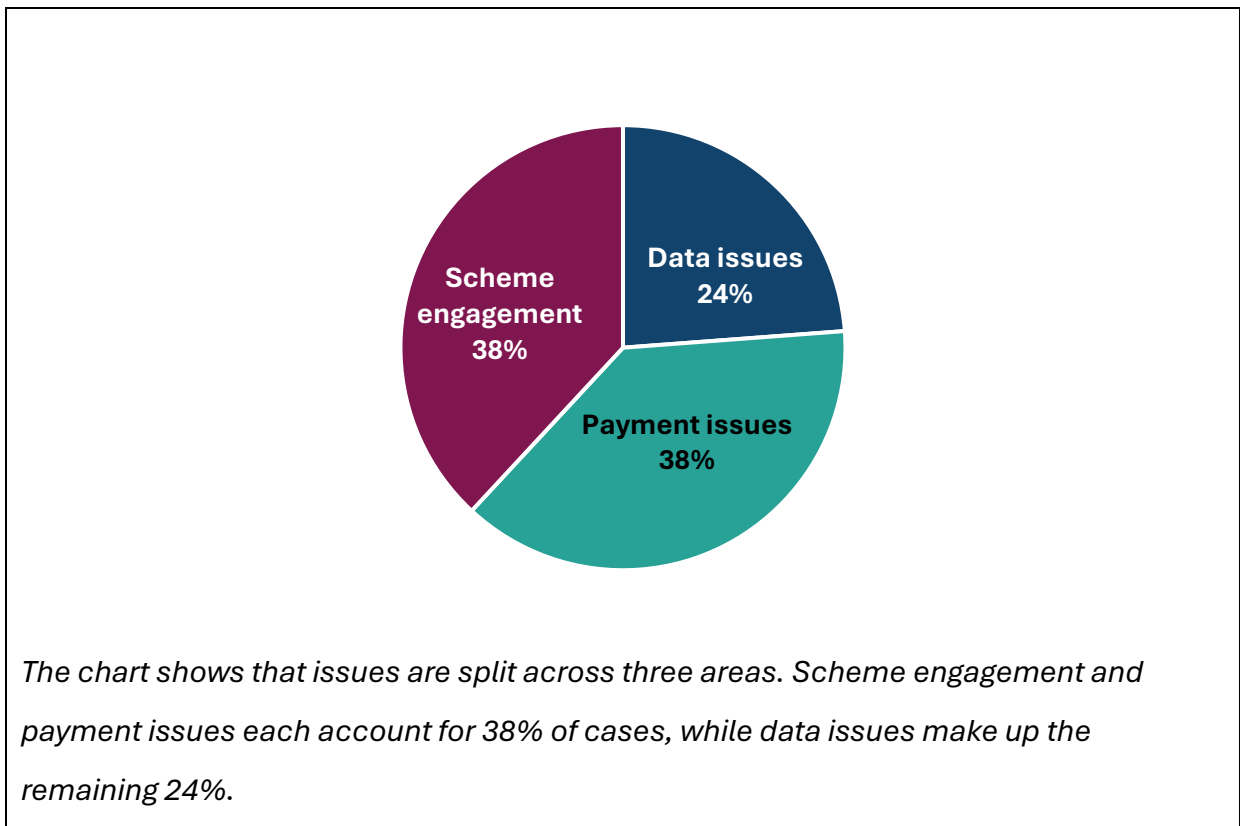
**Figure 2.1: 'Level 1' incidents by supplier - July to December 2025**

- 2.6. So Energy recorded 2 'Level 1' scheme engagement incidents and one payment incident, all on the GGL scheme. This included a failure to respond to requests for information and missing a levy payment deadline. They engaged promptly and constructively with us to address these issues, and we have agreed a solution which is now being implemented. This highlights how effective engagement can support timely resolution of non-compliance.
- 2.7. OSSO Energy Plc's 2 'Level 1' incidents were also on the GGL scheme. A scheme engagement incident was recorded when they failed to confirm their meter point data by the deadline, and a payment incident was recorded when they made their levy payment into the incorrect Ofgem bank account. We have

engaged with OSSO Energy Plc and requested a plan to address these failings going forward.

- 2.8. We note improvements made by Foxglove Energy Supply Ltd, Square 1 Energy Ltd, Utility Warehouse Ltd and OVO Electricity Ltd. These suppliers had no 'Level 1' incidents during the period July to December 2025.

**Figure 2.2: 'Level 1' incidents by type - July to December 2025**



- 2.9. When looking across all 'Level 1' incidents recorded in the period by type, scheme engagement issues (where suppliers failed to participate or comply with the requirements and expectations of the scheme) accounted for 8 of the total. Four of these incidents occurred on the ECO scheme and 4 on the GGL. We have engaged with the suppliers involved to reaffirm our expectations.
- 2.10. A total of 8 'Level 1' payment-related non-compliance incidents occurred, compromising 5 incidents on the GGL scheme, 2 on the FIT and one on the RO. Engagement with the suppliers involved has supported resolution of these incidents. The most significant incident by an active supplier concerned Voltx

Power Ltd. It failed to discharge its Renewable Obligation by the late payment window deadline of 31 October 2025. Voltx Power Ltd subsequently made payment in full. In response, Voltx Power Ltd implemented procedural changes to reduce the risk of recurrence and made a £25,000 payment to the Voluntary Redress Fund<sup>9</sup>. While this issue was resolved promptly, it highlights the importance of meeting RO obligations and the expectation that suppliers maintain robust processes to avoid similar incidents. Tomato Energy Ltd and Rebel Energy Ltd also failed to fully discharge their Renewables Obligations'. These companies are not included in the list of non-compliant suppliers in this report as they have both ceased trading.

- 2.11. The 5 data non-compliances all occurred on the FIT scheme. All 5 of these were due to missing levelisation data submission deadlines. Late submission of FIT levelisation data creates additional administrative burden for Ofgem, requiring further investigation, engagement with suppliers and potential amendments to scheme calculations. This increases the time and resources needed to complete the levelisation process and ensure scheme costs are accurately apportioned.
- 2.12. In the incidents outlined above, suppliers did not meet their obligations or our expectations, which include accurate and timely data submissions, adherence to payment deadlines, delivery of scheme targets, and robust administrative processes. While we recognise the regulatory burden that may arise when addressing these issues, we generally seek to take a proportionate and pragmatic approach, prioritising the least intrusive response in the first instance. However, suppliers remain responsible for meeting their obligations in full and on time. While we will continue to work with suppliers to address issues, failure to do so may result in more serious consequences.
- 2.13. When looking back over the last 2 years, **Figure 2.3** shows that there have been 170 'Level 1' incidents recorded. The 21 recorded for the most recent period is a

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<sup>9</sup> [Voluntary Redress Fund](https://energyredress.org.uk/): < https://energyredress.org.uk/>

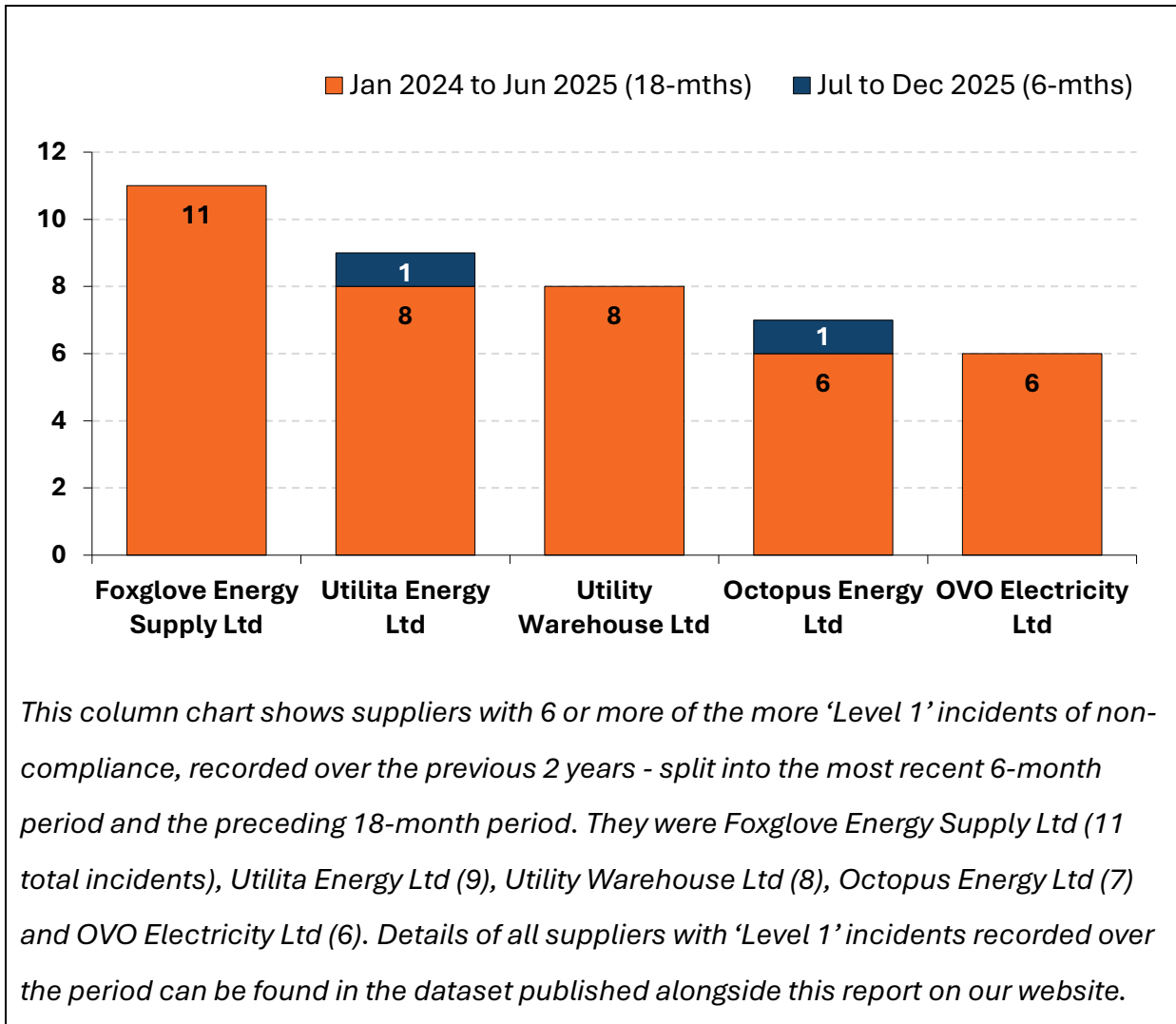
47.5% decrease on the 40 'Level 1' incidents recorded during the equivalent July to December period in 2024. This continues a downward trend over the past two years, which is encouraging. We will continue to work with suppliers to sustain this progress and further reduce the number of 'Level 1' incidents in future reporting periods.

**Figure 2.3: 'Level 1' incidents by period since January 2024**

Report period	'Level 1' incidents
January to June 2024	68
July to December 2024	40
January to June 2025	41
July to December 2025	21
<b>Total</b>	<b>170</b>

2.14. **Figure 2.4** below shows the number of 'Level 1' incidents recorded against individual suppliers over the previous 2-year period. **Figure 2.5** illustrates the type and distribution of incidents between the schemes.

**Figure 2.4: ‘Level 1’ incidents by supplier in the 2-year period since January 2024**

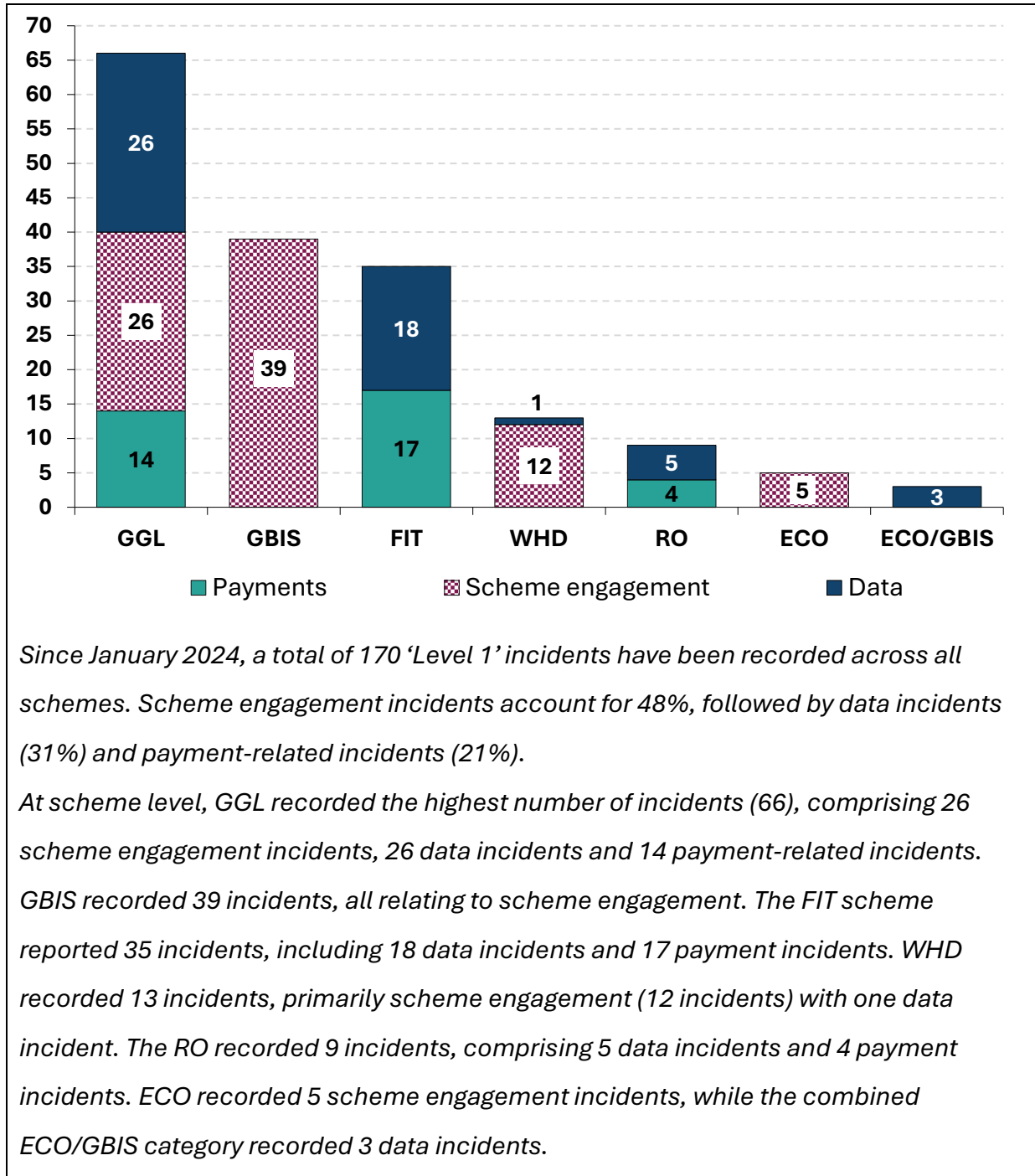


2.15. Several suppliers reduced the number of ‘Level 1’ incidents in July to December 2025 compared with earlier 6-month periods. Foxglove Energy Supply Ltd reduced ‘Level 1’ incidents from 5 in the preceding period to none, while Utility Warehouse and OVO Electricity Ltd each reduced incidents from 2 to zero. This reflects strong progress by these suppliers, and we welcome the steps they have taken to address these issues.

2.16. Utilita Energy Ltd and Octopus Energy Ltd reduced incidents from 3 to one. E.ON Energy Solutions Ltd recorded one ‘Level 1’ incident, unchanged from the previous period. This represents positive progress, and we welcome the efforts and engagement of these suppliers to address the issues. We will continue to

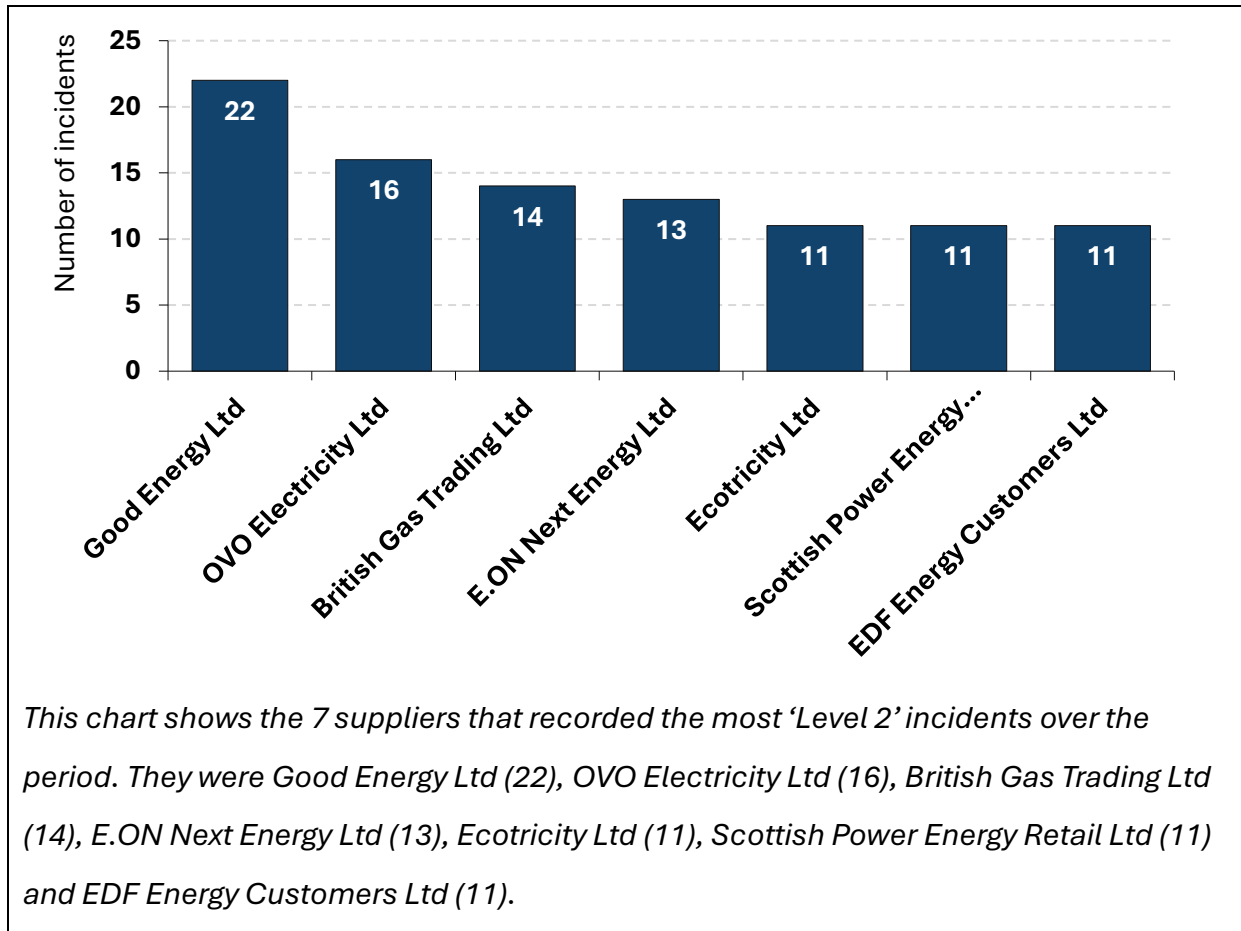
work with them to build on this progress, recognising that the goal is to minimise and ultimately eliminate ‘Level 1’ incidents. .

**Figure 2.5: ‘Level 1’ incidents by scheme and type since January 2024**



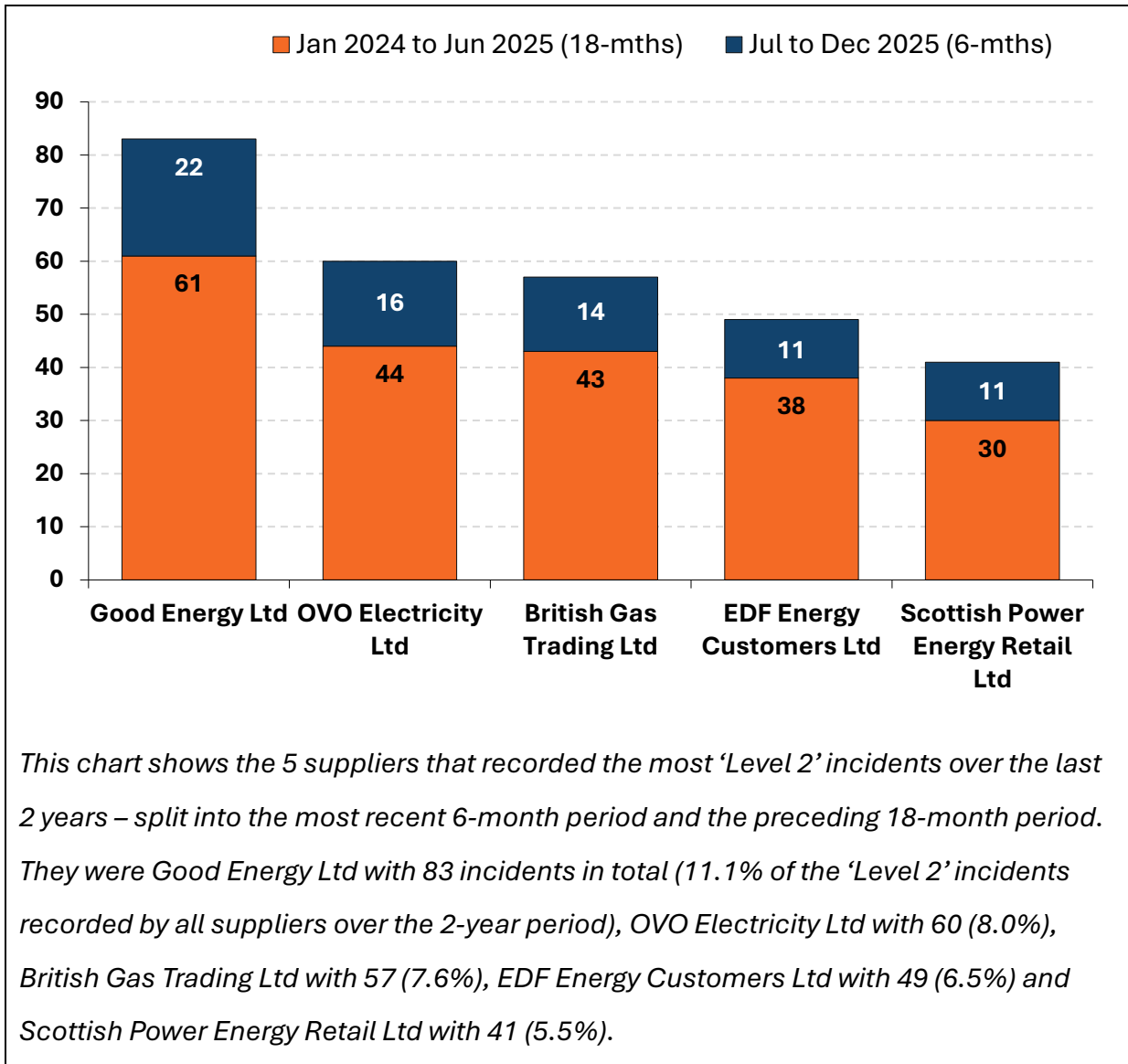
## Level 2 non-compliances

- 2.17. 'Level 2' incidents on the SPR are infractions with less serious impacts and can relate to missed deadlines, governance issues, data accuracy, scheme engagement or incidents with minimal financial implications. Our aim is to deliver schemes efficiently, meet scheme targets and do so in a way that delivers positive outcomes for consumers. While individual 'Level 2' incidents may not warrant a significant compliance or enforcement response, they can affect the efficient delivery of schemes and create additional administrative effort to resolve. When considered collectively, they may indicate recurring issues or weaknesses in governance and could require further attention.
- 2.18. **Figure 2.6** below lists the 7 suppliers with the highest number of 'Level 2' incidents recorded between July and December 2025. Collectively, these suppliers were responsible for a total of 98 'Level 2' incidents over the period, a significant increase on the 66 incidents recorded by the top 7 suppliers in the equivalent period in 2024. We will continue to work with these suppliers to support improvements, and we expect them to take steps to reduce the number of incidents. We encourage proactive engagement to understand the drivers behind these issues and to identify practical ways to address them.
- 2.19. Ninety-seven of the 98 incidents related to the FIT scheme, with these being made up of 91 CFR data accuracy incidents and 6 levelisation data accuracy incidents. We note that the 7 suppliers listed on **Figure 2.6** are FIT Licensees administering large numbers of FIT installations, The number of incidents recorded is relatively small in comparison to the number of installations that these FIT Licensees are administering, However, 97 data accuracy incidents remain a significant number, particularly when compared to the 66 recorded in the equivalent period in 2024, and highlight the need for continued improvement.
- 2.20. There was one incident in relation to the ECO scheme, as the supplier failed to provide required documentation when requested.

**Figure 2.6: ‘Level 2’ incidents top 7 suppliers – July to December 2025**

2.21. When looking at ‘Level 2’ incidents recorded over the previous 2-year period, **Figure 2.7** shows the 290 incidents recorded by the top 5 suppliers. It should be noted that all 5 of these suppliers feature in the top suppliers for both the current and the previous 2-year period. Our compliance approach takes a pragmatic and risk-based approach to supplier engagement. Formal compliance action is rarely our first response to incidents of this nature. Instead, we’ll look to understand the issue and discuss with a supplier how similar incidents can be prevented. We asked those suppliers in **Figure 2.7** to review the incidents that occurred on the FIT scheme during July-December 2025 and take steps to prevent these from recurring. We will monitor FIT scheme compliance and act in response to further incidents if necessary.

**Figure 2.7: ‘Level 2’ incidents - top 5 suppliers since January 2024**



2.22. Where non-compliance is repeated or there is insufficient improvement, whether within a specific scheme or across multiple schemes we may consider a stronger response. Each case is assessed on its merits. Our preference is to resolve issues quickly using the least intrusive and most proportionate approach. This may include working-level discussions, bilateral meetings or site visits. Where this approach does not achieve the desired outcome, matters may be escalated to senior leadership within both Ofgem and the relevant supplier. In some cases, we may open a compliance investigation, taking into account broader supplier licence obligations.

### 3. Compliance spotlight – Central FIT Register

This chapter focuses on the Central FIT Register and the work we have carried out with FIT Licensees to improve operation of the FIT Scheme.

- 3.1. Administration of the FIT scheme is split between Ofgem and FIT Licensees. Much of the day-to-day administration of the scheme is handled by FIT Licensees, including:
- Making FIT payments
  - Taking and verifying meter readings
  - Handling complaints
  - Updating generator details
- 3.2. This work often involves updating the Central FIT Register (CFR), an electronic, web-based system used by Ofgem and FIT Licensees to administer the Feed-in Tariffs scheme on behalf of the Department for Energy Security and Net Zero (DESNZ). The CFR holds essential information for scheme operation, including generator details, technology type and meter inspection data.
- 3.3. The CFR is a vital component of the FIT scheme. The information it holds supports the management and operation of the scheme, including the data required for levelisation (the distribution of scheme costs among FIT Licensees). Maintaining an up-to-date and accurate CFR is therefore critical to its effective administration.

**CFR Audit**

3.4. We conduct annual targeted audits of FIT Licensees to provide assurance that they are compliant with their obligations under the FIT Order 2012<sup>10</sup>. Alongside our annual audits, we conduct bespoke audits. These can be thematic in nature or can focus on specific licensees or issues.

3.5. In 2024 to 2025 we audited the CFR. The purpose of the audit was to test the accuracy of data held. We audited data that related to a FIT installation's scheme eligibility, specifically:

- Application Date
- Grid Connection
- EPC Type
- Meter Inspection Date
- Payment Status
- Community/School Type
- Commissioning Date
- Eligibility Date/End Date
- Grant Received
- PV Installation Type
- Tariff Description
- Ownership

3.6. We selected 13 FIT Licensees to participate in the audit. The participating licensees were:

- Arto Energy Ltd
- British Gas Trading Ltd

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<sup>10</sup> [The Feed-in Tariffs Order 2012 \(as amended\):](https://www.legislation.gov.uk/primary+secondary?title=Feed-in%20Tariffs%20)

<<https://www.legislation.gov.uk/primary+secondary?title=Feed-in%20Tariffs%20>>

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- E.ON Next Energy Ltd
- Ecotricity Ltd
- Electricity Plus Supply Ltd
- EDF Energy Customers Ltd
- Good Energy Ltd
- Octopus Energy Ltd
- Opus Energy Group Ltd
- Ovo Energy Ltd
- Scottish Power Energy Retail Ltd
- The Co-operative Energy Ltd
- TotalEnergies Gas & Power Ltd

3.7. We sampled 419 FIT installations that were administered by these licensees. We compared the information recorded on the CFR to that held by each licensee and asked the 13 licensees to provide evidence to confirm if the information recorded on the CFR was accurate.

3.8. We conducted a desktop analysis of the information we gathered. We reviewed hundreds of pieces of evidence, such as proof of ownership documents, land registry data, generator correspondence, complaints data, payment data and supplier governance processes.

3.9. We also conducted site visits at Ecotricity, Eon Next Energy Ltd, British Gas Trading Ltd, Scottish Power Energy Retail Ltd and OVO Energy Ltd.

3.10. The purpose of these visits was to better understand each FIT Licensee's compliance processes, how it maintains the CFR and the nature of its CFR governance arrangements. Site visits allowed us to raise, discuss and resolve queries quickly with suppliers - demonstrating how we work collaboratively to resolve issues. Spending a day on-site allowed issues to be addressed more quickly than through other channels, while also strengthening working

relationships between Ofgem and suppliers. This approach supports our evolving PACT framework (Predictable, Agile, Collaborative, Tech-enabled), particularly the focus on collaboration, by encouraging open dialogue and joint problem-solving to resolve issues more effectively. We thank each of these licensees for hosting Ofgem, for their participation in this work and ongoing support in ensuring that the FIT scheme continues to deliver positive outcomes for its stakeholders.

### **Audit Results**

- 3.11. The audit results were broadly positive, with the CFR found to hold accurate data and no material data accuracy issues identified. This is an excellent result, and we recognise the effective maintenance of the CFR by those FIT Licensees that participated in the audit. The audit did, however, identify some issues that required follow up engagement with FIT Licensees.

### **Document Availability**

- 3.12. The CFR holds data for over 800,000 FIT installations. When administering this number of installations errors will occur. We expect FIT Licensees to have in place systems to minimise CFR errors and correct them quickly when they do happen.
- 3.13. It is essential that licensees retain FIT scheme documentation in accordance with FIT scheme guidance. Licensees must retain documents relating to the FIT Scheme for a period of 5 years. Data relating to FIT scheme generators should be retained until the end of the generator's eligibility period. Such documentation should include ownership documentation, Statement of FIT Terms and application documents. These documents should be readily available and are likely to be requested for review, as part of supplier audits.
- 3.14. Audited FIT Licensees, apart from Opus Energy Group Ltd and TotalEnergies Gas and Power Ltd were unable initially, to provide required evidence demonstrating that information held on the CFR was accurate. In particular,

documents demonstrating who owned a FIT installation, the Statement of FIT Terms and application documents were not always available. Without visibility of this evidence it is challenging for Ofgem to validate information on the CFR.

- 3.15. Following discussion most licensees were able to provide the documentation in question. In some cases, this involved extracting it from archived storage systems or requesting it from the FIT generator.
- 3.16. A small number of licensees were able to provide only partial supporting documentary evidence. In each case significant organisational or system changes had resulted in the documentation not being available. These licensees were able to validate the information held through providing audit trails, demonstrating their FIT systems and explaining their governance arrangements. This information was sufficient to enable us to conclude that these suppliers had appropriately maintained the CFR.
- 3.17. We will write to all FIT Licensees with our feedback and reflections following the audit. We ask that licensees review this and consider whether any changes to their compliance processes are needed.

### **FIT Biennial Meter Verification Compliance**

- 3.18. Prior to conducting the audit, we saw evidence that some suppliers were not complying with their obligation to carry out FIT meter inspections. The audit reinforced this concern, showing that a significant number of FIT Licensees were unable to evidence that they had carried out meter inspections.
- 3.19. Standard Licence Conditions 33 requires FIT Licensees to take all reasonable steps to verify generation and export meter readings at least once every 2 years. The purpose of this is to confirm that meter readings and the related payments are accurate. If meter readings cannot be verified a generator's FIT payments may be withheld.
- 3.20. We published an in depth look at this issue, which had been a focus of our compliance work, in our July to December 2024 Supplier Performance Report.

We noted a significant improvement in overdue meter inspection dates, down from 19% in July 2024 to 8.1% in December 2024.

- 3.21. The percentage of overdue meter inspections is now down to 6%. This shows the significant progress that has been made over the past 2 years, and it is important this is sustained. We will continue to monitor compliance, and where standards slip, compliance action may be taken.

## 4. All non-compliances – Jul to Dec 2025

In this chapter we provide details on all the supplier non-compliances that occurred over the period 1 July 2025 to 31 December 2025. The non-compliances are broken down into administrative or legislative incidents, by scheme, and by category - covering data, payment and scheme engagement issues.

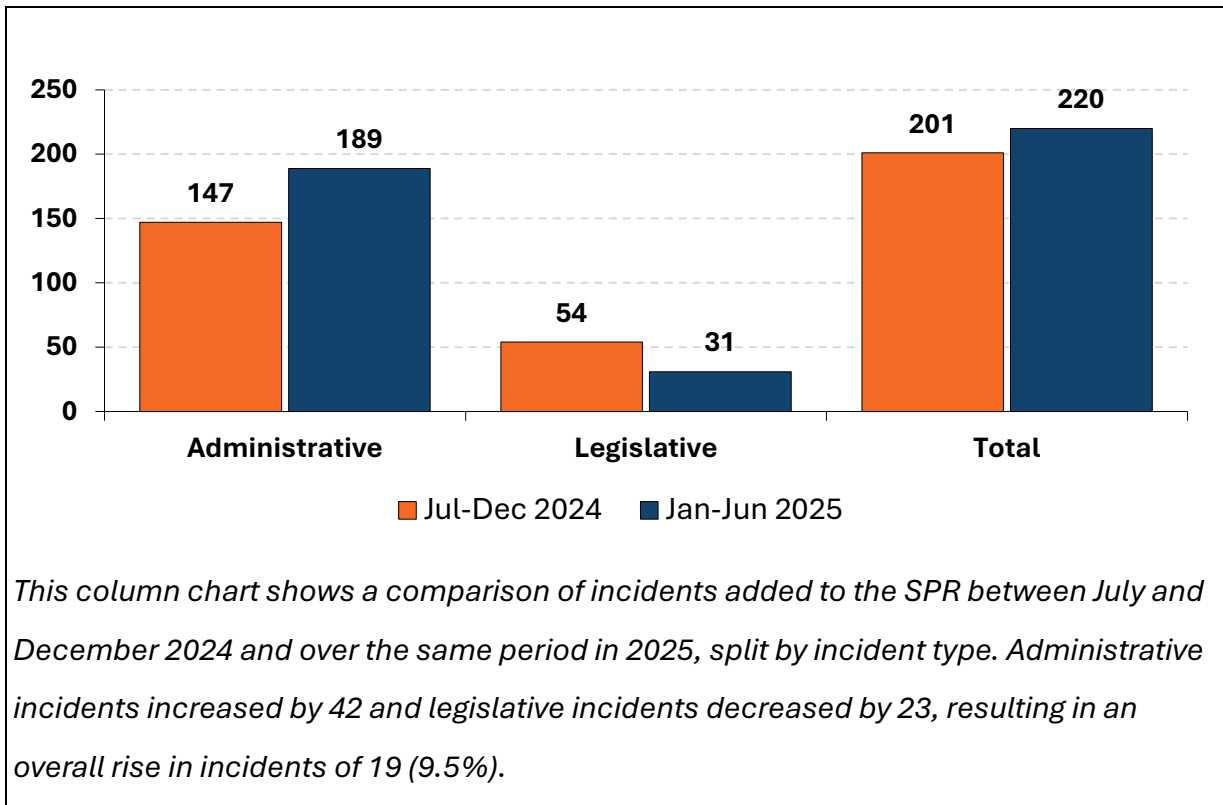
1.1. This chapter presents information on all supplier non-compliances that occurred over the period 1 July 2025 to 31 December 2025. For more detail on the incidents featured you can refer to the dataset published alongside this report.

4.1. Incidents are categorised as being either administrative or legislative:

- **Administrative** incidents are those where a supplier has not met a requirement set by Ofgem. There was a total of 189 administrative incidents, representing 85.9% of all incidents recorded over the period. This marks a 28.6% increase in incidents compared to the equivalent period in 2024.
- **Legislative** incidents are those where a supplier has not achieved a requirement in scheme legislation. A total of 31 legislative incidents were reported, accounting for 14.1% of the total. This reflects a 42.6% decrease in incidents from the same period in 2024.

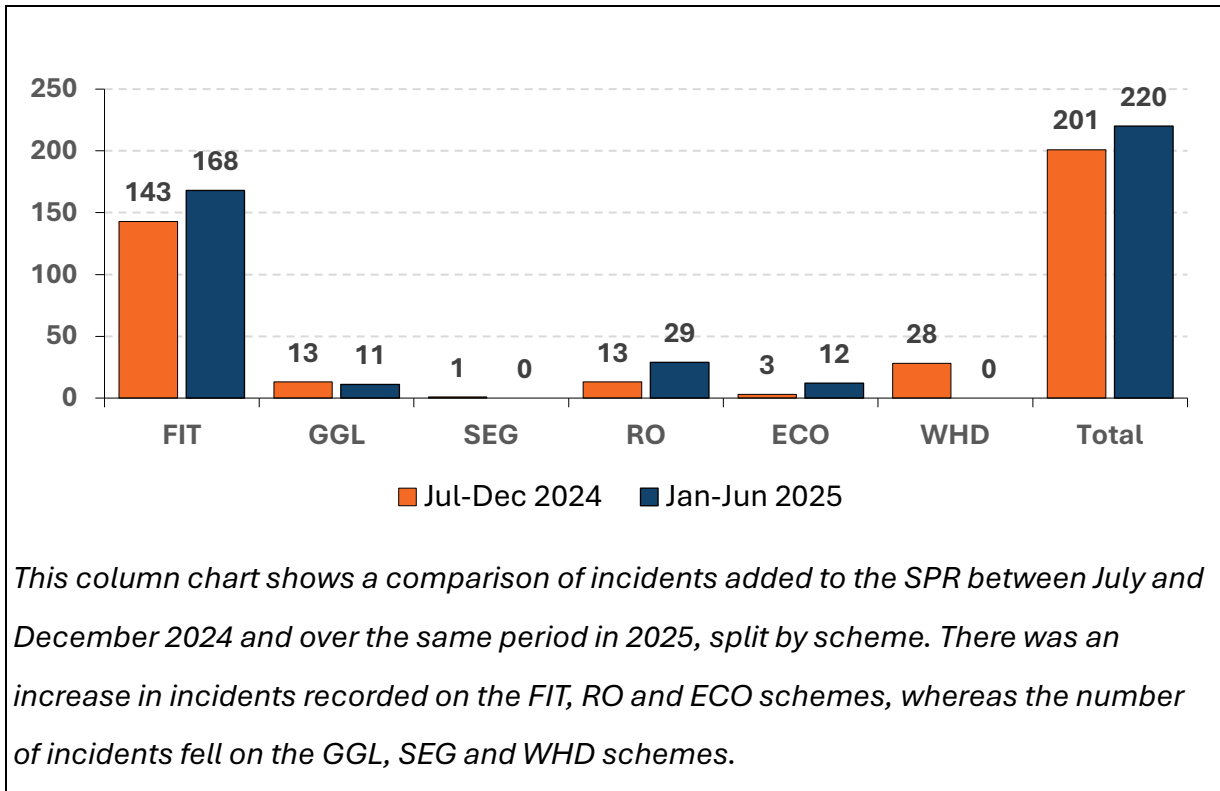
4.2. As shown in **Figure 4.1**, the overall number of incidents recorded increased by 9.5% compared to the equivalent period in 2024. While suppliers have made strong progress in reducing more significant non-compliance as reflected in the reduction in ‘Level 1’ incidents (**Figure 2.3**), lower-level incidents remain an area for improvement. It is important that we are transparent about both progress and areas where further improvement is needed. We encourage suppliers to reflect on the information set out in Figures 4.1, 4.2 and 4.3 and consider what steps can be taken to reduce incidents of non-compliance.

**Figure 4.1: Total non-compliance incidents - by type**



4.3. **Figure 4.2** shows the breakdown of incidents recorded by scheme. FIT-related incidents increased by 17.5% and continue to be the most common.

**Figure 4.2: Total non-compliance incidents - by scheme**

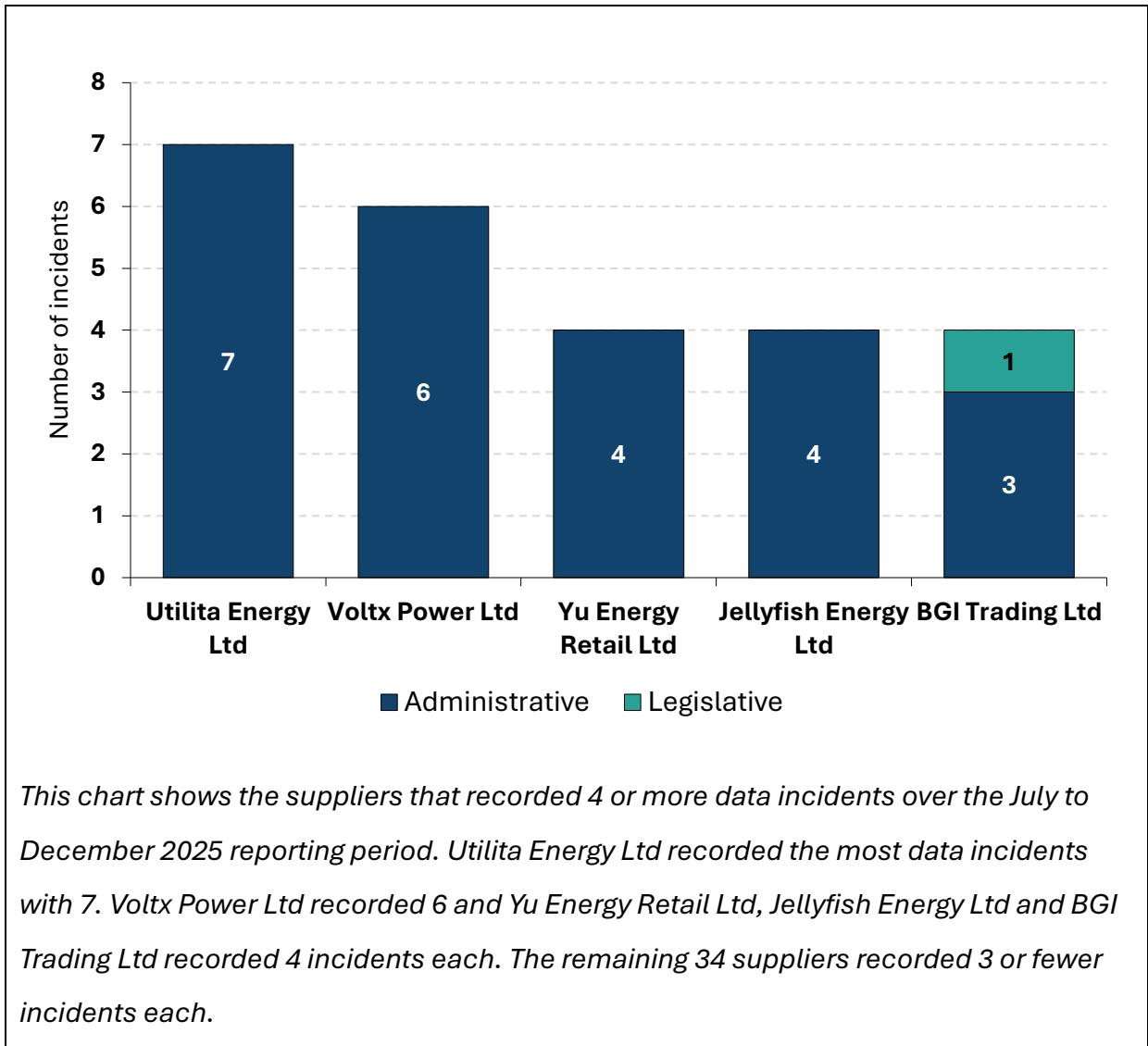


4.4. These non-compliances are further broken down into specific categories of non-compliance. The charts below present information on the number of non-compliances by supplier for each category and a breakdown of the schemes on which the non-compliances occurred.

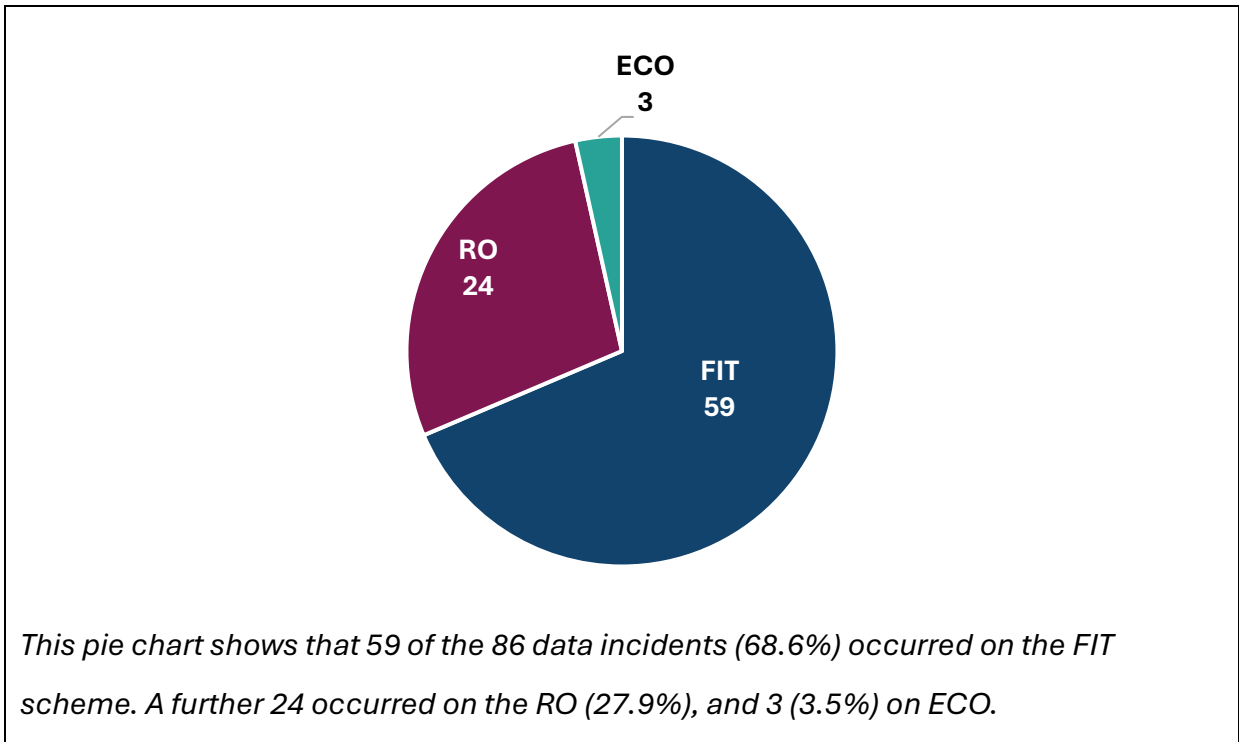
## Data

- 4.5. Ensuring positive scheme outcomes relies on the availability of accurate data. In July 2024, we wrote to suppliers setting out our regulatory expectations, including the importance of maintaining high-quality data. As part of our PACT framework (predictable), we are clear in these expectations. To support effective scheme administration, suppliers must provide data that is accurate, timely and submitted in line with relevant requirements. These obligations are set out in legislation and supporting guidance. Suppliers are required under Standard Licence Condition 5 to ensure that data provided is accurate, complete and submitted on time, and may face further consequences where this is not met. They are also required under Condition 4A to maintain robust internal capability, systems and processes to ensure compliance with their regulatory obligations.
- 4.6. Where data is inaccurate or incomplete, this can have direct financial consequences for scheme participants, other suppliers, and ultimately energy consumers.
- 4.7. Details of suppliers with the most data non-compliances that occurred between July and December 2025 are shown in **Figure 4.3** (please note, due to the volume, incidents relating to the CFR are presented separately, starting from paragraph 4.9). All non-CFR data non-compliances split by scheme are shown in **Figure 4.4**, and by type in **Figure 4.5**. Of the 86 incidents recorded, 81 were administrative and 5 were legislative non-compliances.

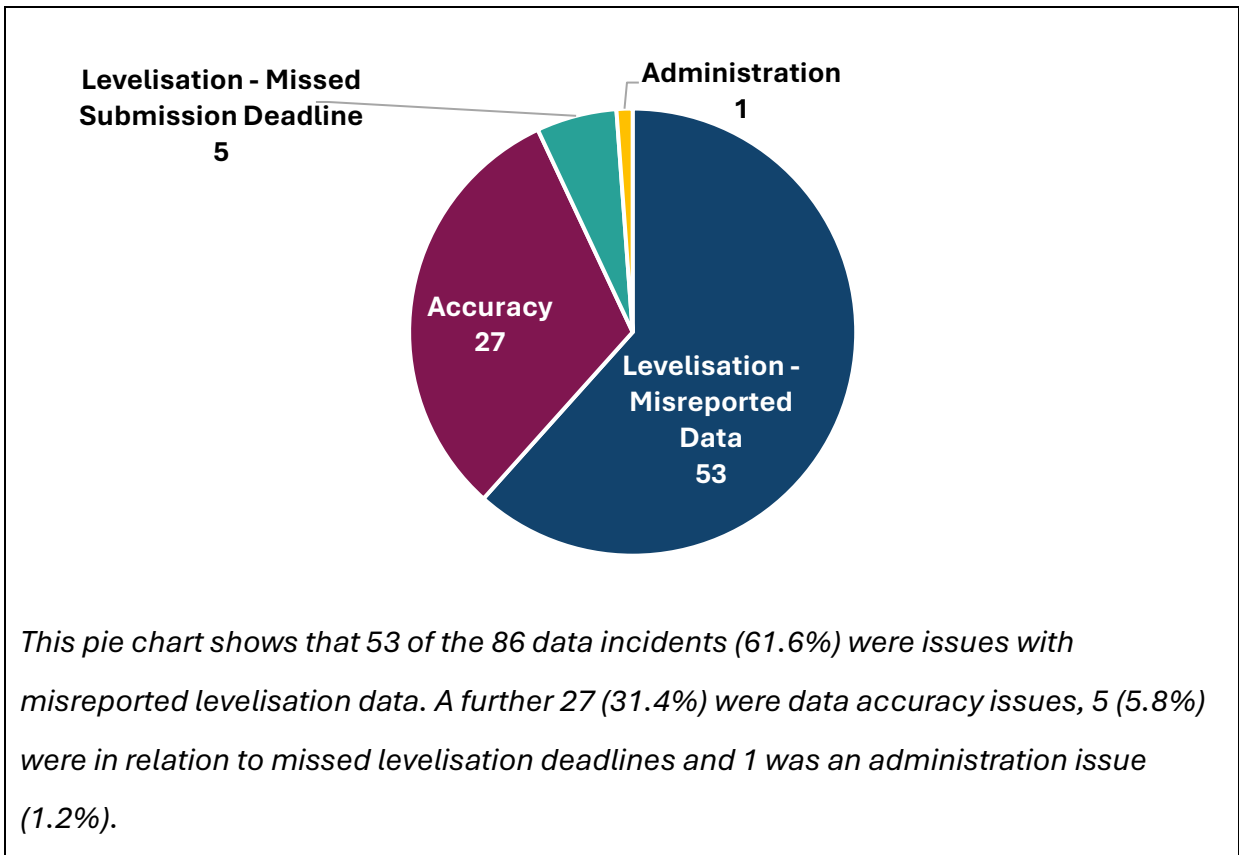
**Figure 4.3: Data incidents – by supplier**



**Figure 4.4: Data incidents - by scheme**

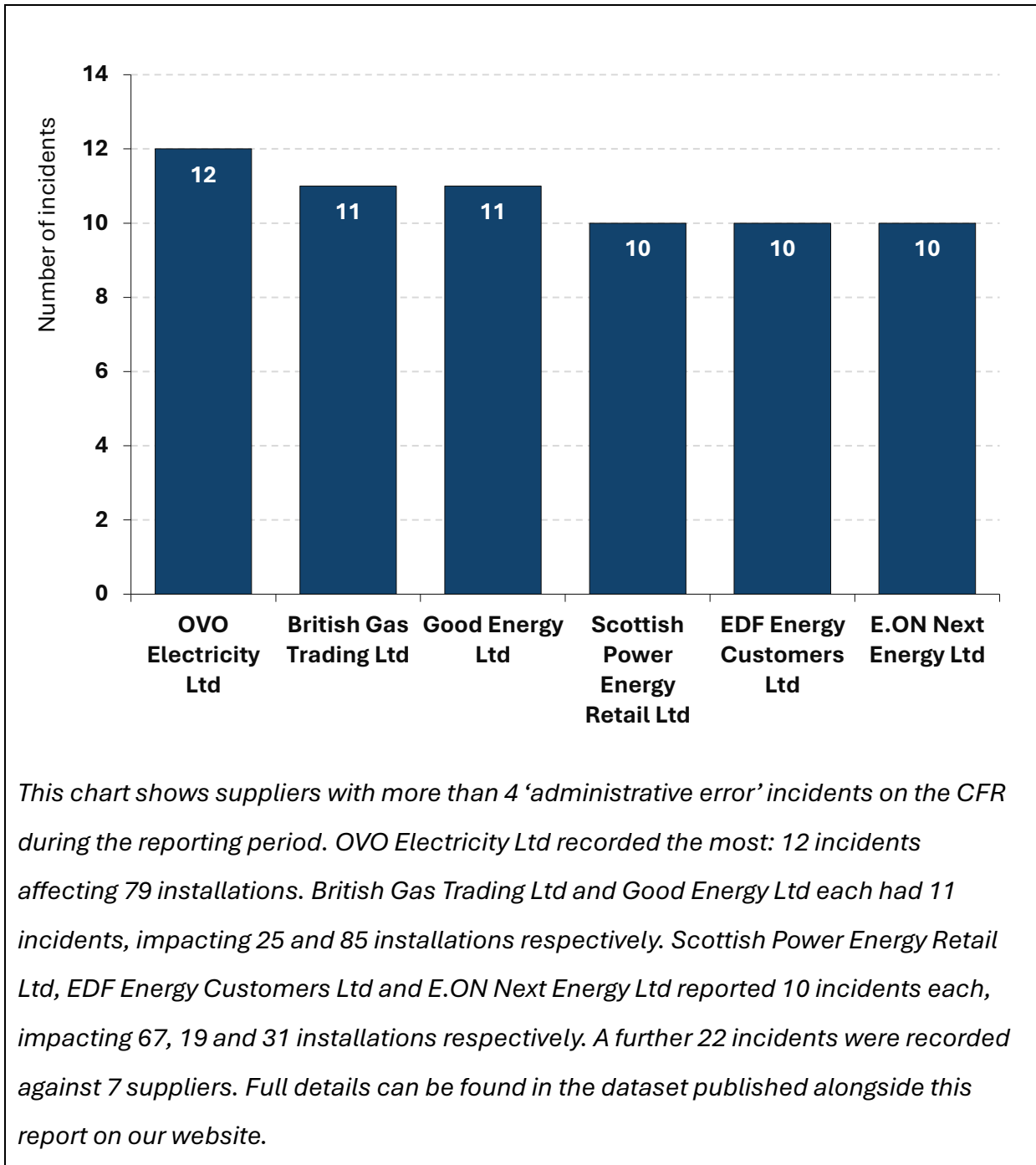


**Figure 4.5: Data incidents - by type**



**CFR data accuracy incidents**

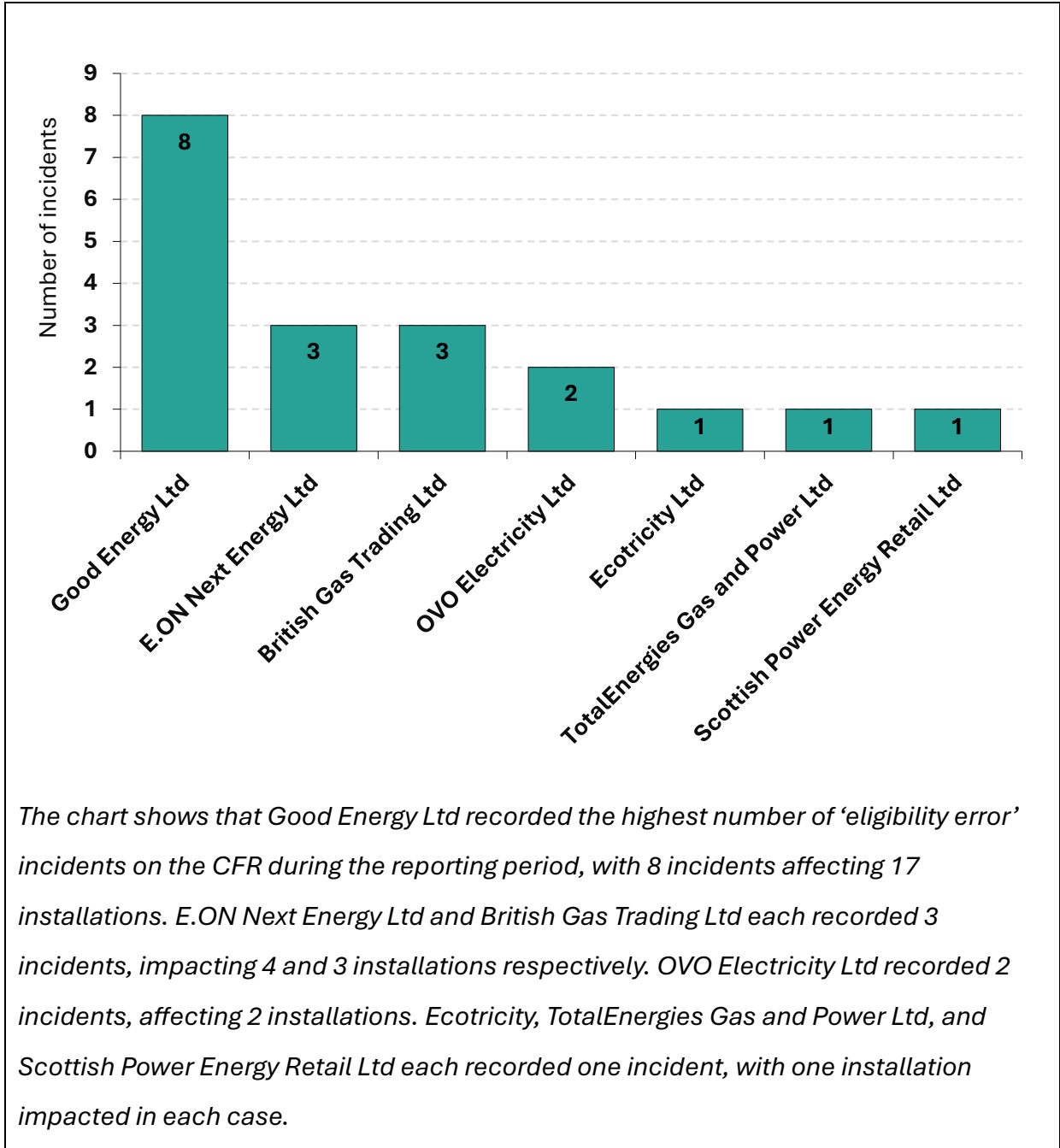
- 4.8. As part of our duties under the FIT scheme we are required to manage and maintain the CFR database. FIT Licensees use this database to record and update details of FIT installations and are responsible for ensuring the data added to the CFR is accurate and complete.
- 4.9. Non-compliances occur when there is an error in the details entered by a supplier. These non-compliances are categorised as follows:
- **Administrative error approvals** – where we approve amendments made by a licensee which corrects an earlier error not affecting an installation’s tariff.
  - **Administrative error rejections** – where a licensee submits an amendment or new registration which we must reject due to an error, which does not affect the installation’s tariff.
  - **Eligibility error approvals** – where we approve amendments made by a licensee which corrects an earlier error which affects an installation’s tariff.
  - **Eligibility error rejections** – where a licensee submits an amendment or new registration which we must reject due to an error, which affects the installation’s tariff.
- 4.10. To ensure the data on the CFR is correct, we engage with suppliers regarding specific installations where we have concerns about inaccuracies. FIT Licensees have an obligation to take all reasonable steps to ensure data entered onto the CFR is accurate and up to date. As part of this, FIT Licensees should ensure that they hold appropriate documentation to support entries on the CFR.
- 4.11. Details of ‘administrative error’ non-compliances that occurred between July and December 2025 can be seen in **Figure 4.6**.

**Figure 4.6: FIT – ‘Administrative error’ CFR incidents – by supplier<sup>11</sup>**

<sup>11</sup> Please note that one CFR incident can impact more than one FIT installation.

4.12. Details of CFR ‘eligibility error’ non-compliances can be seen in **Figure 4.7**. These were all legislative non-compliances.

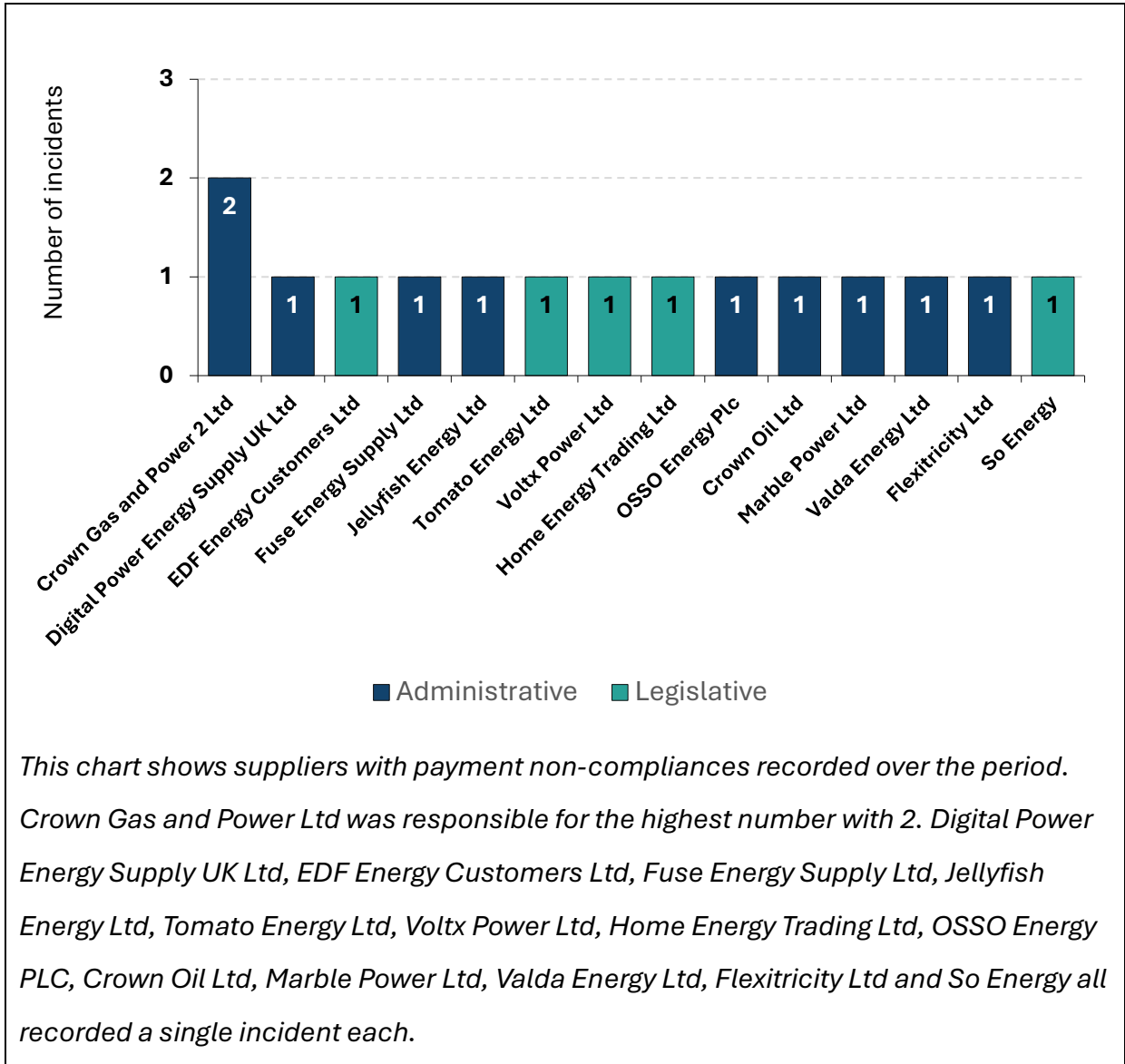
**Figure 4.7: FIT – ‘Eligibility error’ CFR incidents – by supplier**



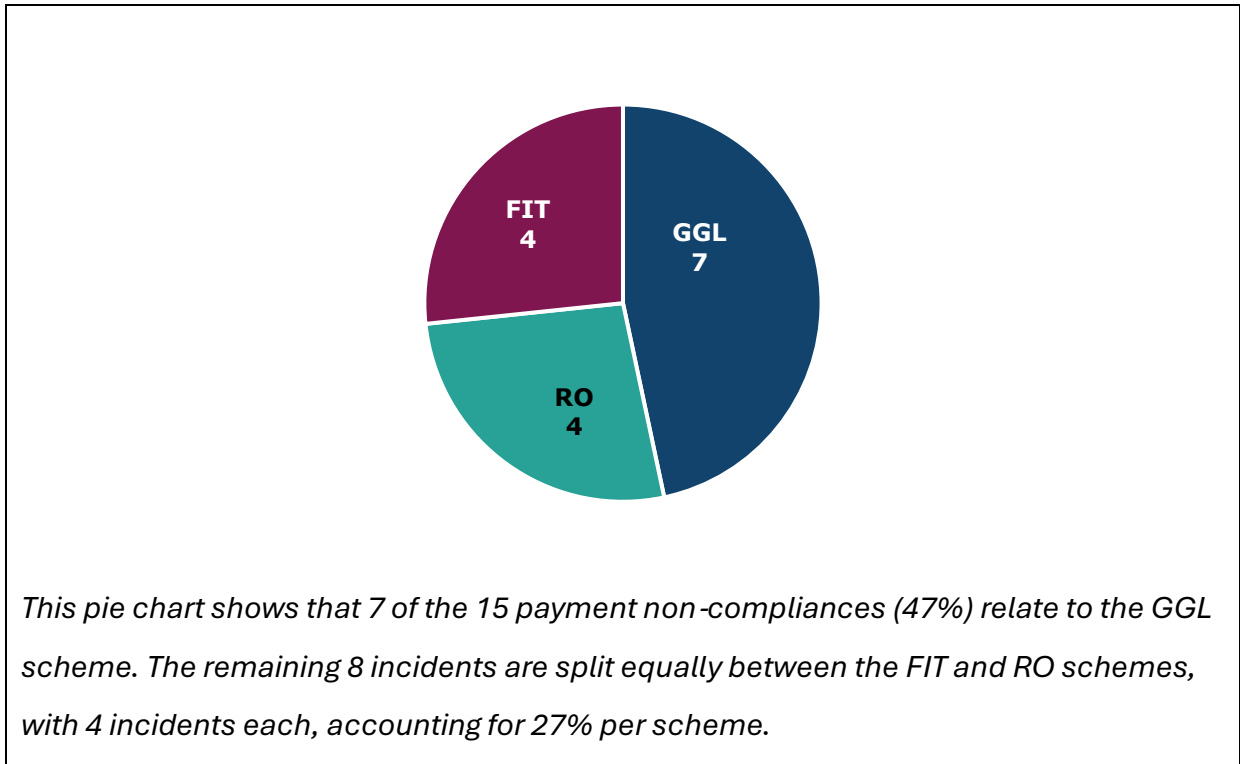
## Payments

- 4.13. Suppliers are required to make payments to us in relation to several of the schemes we administer. We ensure suppliers are notified of how and when to make payments to us. Where a required payment is late, wrong, missed or there is some other type of issue, these non-compliances are added to the SPR. In many cases, payment non-compliances are legislative non-compliances. However, some, for example where money is paid into the wrong account, are administrative non-compliances.
- 4.14. Where payment is not received on time, it undermines scheme outcomes and this creates an unnecessary administrative burden for us to resolve. Furthermore, if supplier(s) fail to pay, this would have an impact on every other supplier (and by extension their bill payers), as those suppliers would have to absorb a disproportionate share of the scheme's cost.
- 4.15. Payment-related non-compliance may also indicate wider financial pressures, which we monitor closely as part of our compliance approach. As appropriate, we will take further action where required, which may include issuing provisional or final orders, or financial penalties in response to late payments. Suppliers recording payment non-compliances between July and December 2025 can be seen in **Figure 4.8**. The same non-compliances split by scheme are shown in **Figure 4.9**, and by type in **Figure 4.10**. Of the 15 incidents recorded, 10 were administrative and 5 were legislative non-compliances.

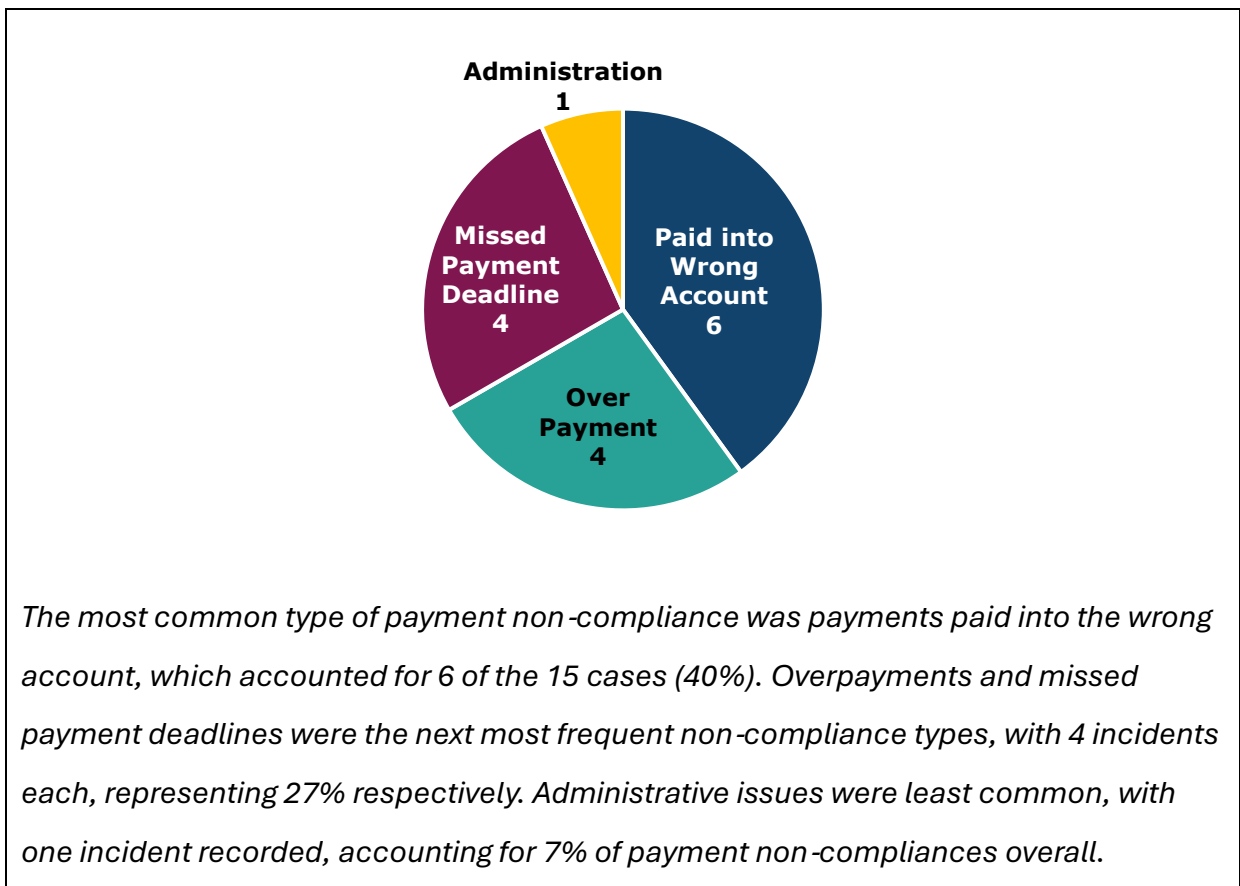
**Figure 4.8: Payment non-compliances – by supplier**



**Figure 4.9: Payment non-compliances – by scheme**



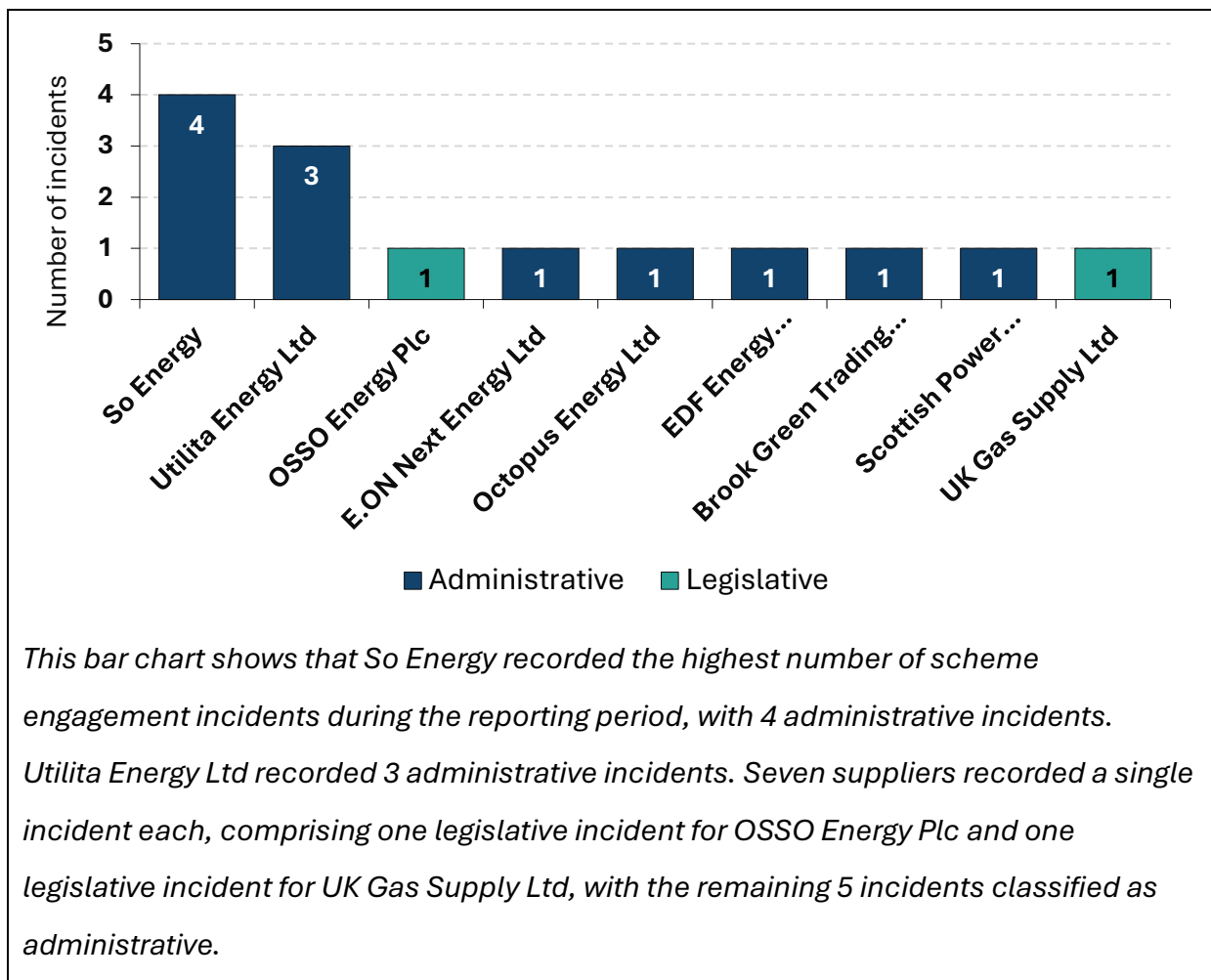
**Figure 4.10: Payment non-compliances – by type**



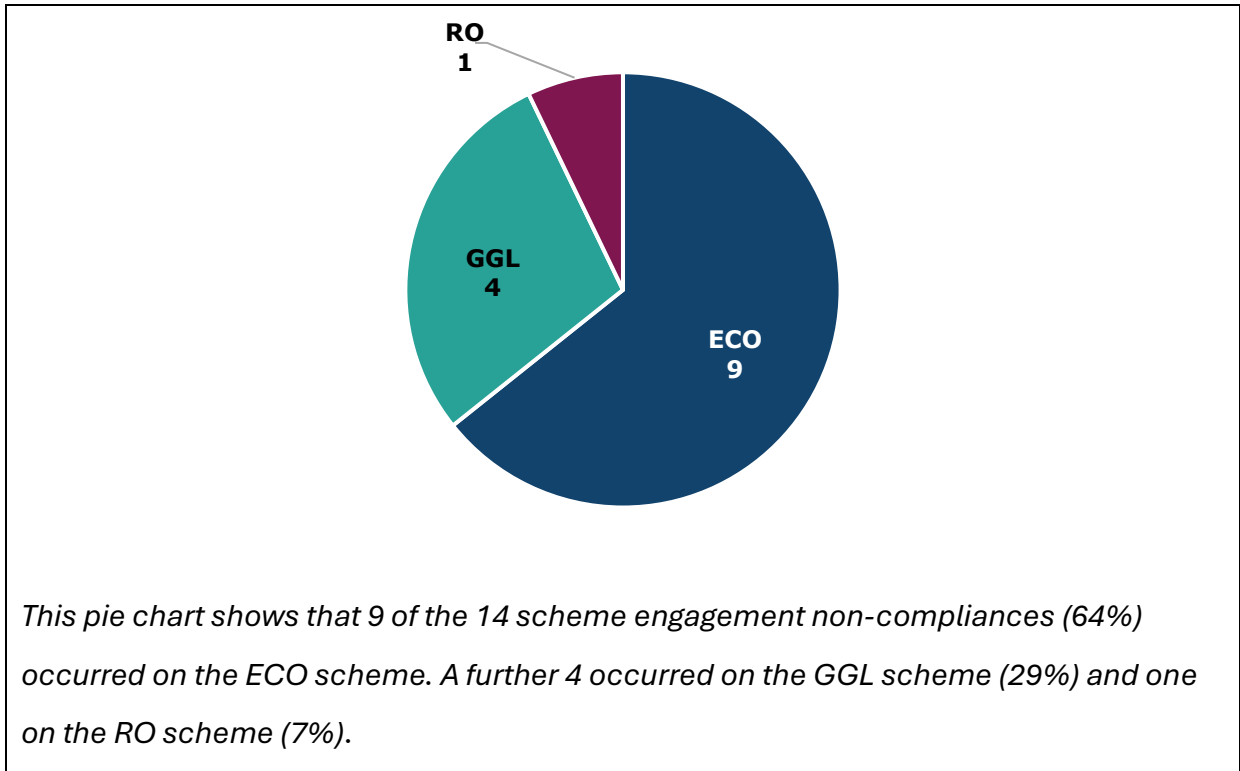
## Scheme engagement

4.16. It is important that suppliers engage fully with the schemes they are obligated to participate in. Through our PACT framework, we are clear in the expectations we set, while encouraging open and constructive engagement focused on resolving issues at pace. Where suppliers do not engage fully or fail to meet requirements, this can impact the effective delivery of schemes and the achievement of policy objectives. Suppliers recording scheme engagement non-compliances between July and December 2025 can be seen in **Figure 4.11**. The same non-compliances split by scheme are shown in **Figure 4.12**, and by type in **Figure 4.13**. Of the 14 incidents recorded 12 were administrative non-compliances and 2 were legislative non-compliances.

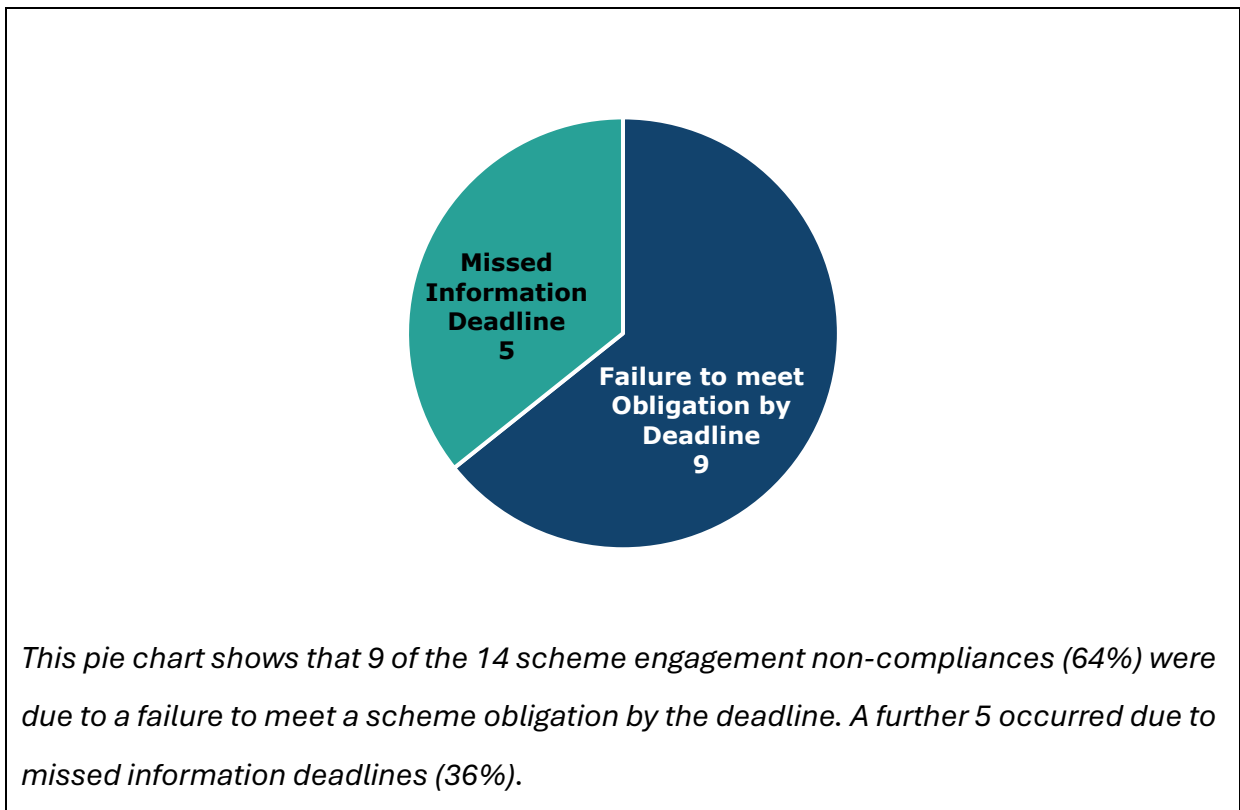
**Figure 4.11: Scheme engagement incidents – by supplier**



**Figure 4.12: Scheme engagement non-compliances – by scheme**



**Figure 4.13: Scheme engagement non-compliances – by type**



## 5. Next steps

This chapter outlines our continuing expectations for supplier compliance and engagement, and the actions we may take where performance falls short.

- 1.2. As we look ahead, suppliers play a critical role in ensuring schemes are delivered effectively, and we will continue to work closely with them to support full compliance with their obligations. Suppliers must take proactive steps to understand and meet their responsibilities, and to engage constructively with Ofgem and the schemes they are part of. We are committed to supporting suppliers in doing so through clearer expectations and more proactive engagement. Where challenges arise, we will work with suppliers to resolve issues quickly and in a way that supports positive outcomes for consumers. This includes earlier engagement and more open dialogue on emerging issues.
- 1.3. We expect suppliers to demonstrate a strong commitment to scheme delivery by maintaining accurate records, meeting deadlines, and responding promptly to requests for information. These expectations remain central to effective scheme delivery and value for money. Where issues arise, we will continue to take a proportionate and pragmatic approach. This will be alongside continued engagement to support improvement and address issues at an earlier stage. This may include increased compliance engagement, the requirement to submit action plans, or, where appropriate, escalation to formal enforcement action.
- 1.4. We will continue to refine and improve the SPR to ensure it remains a valuable, transparent and accessible resource for stakeholders. This includes incorporating stakeholder feedback and adapting the report as schemes and market expectations evolve. Since its inception, the SPR has driven strong engagement and is one of the most widely accessed resources on the Ofgem website. As the schemes we administer continue to evolve, it is important that the SPR evolves with them.

- 1.5. Over the summer, we will publish a call for input to seek stakeholders' views on the information we provide, the value it adds, and how the report could be enhanced. This will build on feedback already received and inform the next phase of development for the SPR. This feedback, alongside our ongoing engagement with stakeholders, will inform future iterations of the SPR ensuring it remains relevant, insightful and effective in supporting transparency and accountability across the sector. If you wish to be kept informed about our call for input, please email us at: [schemesreportingfeedback@ofgem.gov.uk](mailto:schemesreportingfeedback@ofgem.gov.uk)