

Heat Trust Committee Meeting Minutes

12th February 2026

Video conference

PUBLIC MINUTES

In attendance:			
Name	Role	Company	Voting?
Karen McArthur	Independent Chair	N/A	Casting
Meghan Newman	ADE representative	Association of Decentralised Energy	Yes
Tom Kavanagh-Rose	UK Government (DESNZ) representative	Department for Energy Security & Net Zero	No
John Porter	Consumer representative	Citizens Advice Scotland	Yes
Michael O'Brien	Consumer representative	Consumer Scotland	Yes
Lisa Gregory	Relevant sector representative	Ginger Energy	Yes
Ed Weightman	Independent expert	Severn Trent	Yes
Rosie-May Tilley	Registered Participant representative	SSE	Yes
Anna Eager	Board representative	Heat Trust Board	No
Mathew West	Scottish Government - alternate	Scottish Government	No
Tricia Quinn	Ofgem representative	Ofgem	No
Aleksandra Bak	Registered Participant representative	Veolia	Yes
Lizzie Moreton	Scheme Administrator	Heat Trust	No
Stephen Knight	Scheme Administrator	Heat Trust	No

Apologies:

Role	Company	Role	Voting
Christine Tate	Scope	Consumer representative	Yes
Cecília Robertson dos Santos	Citizens Advice	Consumer representative	Yes
Rosie-May Tilley	SSE	Registered Participant representative	Yes
Jo Mayall	Veolia	Registered Participant representative	Yes
Rebecca Robbins	Renewable Energy Consumer Code (RECC)	Independent expert	Yes
Malcolm Rose	Scottish Government	Scottish Government representative	No



1. Introduction

The Chair:

- Reminded all attendees of the Competition Law guidance and that the meeting would be recorded for minute-taking purposes.
- Noted that the non-confidential minutes of the previous meeting in November 2025 were published on 9th December 2025, after circulating them by correspondence for the Committee's review and receiving no comments.
- Noted the apologies received.

2. DESNZ Update

The Market Framework Amendment Regulations and Amendment No. 2 Regulations were successfully passed in Parliament. The second set, introduced in January, corrected a minor issue with the definition of micro and small businesses.

January also marked the commencement of the new regulations, alongside publication of the Warm Homes Plan, the government's zoning response, and the launch of the Heat Networks Technical Assurance Scheme statutory consultation. The consultation is open until 15th April, giving stakeholders time to review and respond to the detailed proposals. There will also be a Call for Evidence regarding pricing that we intend to publish with Ofgem later this year.

On consumer protection, internal work is underway to set priorities for the first year of regulation. This includes identifying key focus areas and developing engagement plans with industry and consumer representatives. While there are no major policy updates yet, further engagement with Heat Trust is expected by the next committee meeting.

The Committee:

- a) NOTED the update.

3. Ofgem update

Authorisation conditions were finalised and published on 30 January, alongside guidance covering consumer protection, financial resilience, pricing, and registration. Ofgem has also consulted on monitoring and data reporting guidance and expects to publish a response soon.

A digital registration platform is due to launch in Spring, and heat networks are encouraged to register early and engage with Ofgem. The focus in the first year is on understanding the market, supporting compliance, and prioritising consumer outcomes. Ofgem plans continued engagement with industry and stakeholders, including work on best practice, templates, supporting resources, and further consumer research.

Regulation will be phased, with additional consultations later in the year on areas such as Guaranteed Standards of Performance (GSoP).



The Committee:

- a) NOTED the update.

4. Scottish Government update

A consultation will be published next month on Heat Networks Regulation installation and maintenance licences. These licences will grant heat network developers the rights and powers needed for activities such as road works. The proposals will amend the licensing framework originally set out in the Heat Networks (Scotland) Act 2021. Following consultation, the intention is to progress the updated approach through the Heat and Buildings Bill in the new Scottish Parliament later this year.

The Committee:

- a) NOTED the update

5. Scheme Growth

Heat Trust updated the Committee on recent Scheme growth. It advised that it now protects 94,200 consumers across 147 heat networks registered by 30 heat suppliers (RPs). This includes one new site registration from an existing RP since its last update at the November 2025 Committee meeting.

Heat Trust noted that it continues to receive and process applications to register with the Scheme.

The Committee:

- a) NOTED the update.

6. Scheme Rules update – Permitted Variations 001 and 002

Heat Trust gave an overview of two Permitted Variations to its Scheme Rules (PV001 and PV002). Both are effective from the Ofgem launch date of 27 January 2026 and were notified to RPs on 9 January. Full details of these Permitted Variations can be found in the PV001 and PV002 Scheme Rule Variation Decision document, available at <https://www.heattrust.org/scheme-transition> .

Heat Trust advised that it's not currently expecting to need any further Permitted Variations to Scheme Rules, but will continue to keep this under review throughout 2026 as Ofgem's own rules bed/phase in.

Both the Heat Trust Scheme Rules and Ofgem rules are minimum standards. Scheme Rules will therefore only be varied where it's impossible to comply with both Heat Trust and Ofgem rules. Otherwise, RPs should comply with whichever standard is more stringent, thereby exceeding the other.



7. Scheme Operations update

Heat Trust gave an update on its current approach to Scheme Operations as follows. It noted that any Permitted Variations to its Scheme Operations are dependent on further clarity about Ofgem milestones and it hopes to be able to provide the committee with more detail at the May 2026 meeting.

- **New site registrations:** Heat Trust encourages RPs to continue registering new heat networks with its Scheme as the best way to ensure that their supply arrangements are 'regulation ready'. Once Ofgem registration opens (which won't be before April 2026), Heat Trust will decide when to stop accepting new site applications and will advise RPs accordingly.
- **Monitoring data:** As Ofgem won't start collecting monitoring data from an RP until it completes Ofgem registration, Heat Trust will collect Scheme data from RPs as normal for the October 2025 – March 2026 monitoring period. It's likely to also still collect at least some Scheme monitoring data for the April – September 2026 period, but exactly what and how depends on when Ofgem will be ready to start collecting its own data. Heat Trust will flex its requirements for that period if/as needed to minimise any duplication with Ofgem and will advise RPs nearer the time.
- **Audits:** Heat Trust will continue its Scheme audits until such time as a new audit wouldn't complete. It will decide and communicate this stop point to RPs later this year.
- **Scheme fees:** Annual renewal fees and new site registration fees are now being pro-rated up to the planned Scheme end date of 26 January 2027. Final Scheme fees will be invoiced once Heat Trust's collected in the April 2026 connection numbers from RPs, and Heat Trust will provide RPs with more information about these fees nearer the time.
- **Energy Ombudsman:** The ombudsman continues to take Heat Trust Scheme Rules into account for complaints about Heat Trust Registered Sites, where Heat Trust rules go further than Ofgem's.

Heat Trust additionally advised that:

- While it wants to help facilitate a managed handover of RPs to Ofgem, Heat Trust Registered Sites won't be automatically registered with Ofgem and must be registered by each RP. This is because Ofgem requires information that Heat Trust doesn't hold, including commercially sensitive information.
- Each RP is required by the Scheme to inform Heat Trust when they've completed Ofgem registration for all their Heat Trust Registered Sites. This is because Heat Trust needs this information to decide whether to end the Scheme in January 2027 as planned, or exercise contingency extension arrangements.



- RPs must stay registered and compliant with the Scheme until the Scheme end date, even if they complete their Ofgem registration earlier. This is to ensure a managed handover from Heat Trust to Ofgem, including avoiding any gaps in consumer protections due to Ofgem phasing in its rules.
- Heat Trust will provide RPs with further information about Scheme end later in 2026.
- As part of its handover, Heat Trust will continue sharing all its compliance data (including monitoring data and audit results) with Ofgem.

8. Members Forum update

Members Forum held 22 January 2026

- No RP questions about PVs 001 & 002 or our approach to Scheme Operations
- Ofgem presented on its preparations for registering authorised entities via its digital service:
- Private Beta phase planned to open April 2026; entities must sign up in March in order to take part in this
- Private Beta enables entities to start registering their heat networks early and saves progress if not completed
- registration service unlikely to open to all until late summer 2026 (at the earliest), following completion of 8-week Private Beta phase and then Ofgem's internal stage gate in summer 2026
- This creates a risk around our planned January 2027 Scheme end, which we plan to mitigate by encouraging RPs and Ofgem to use Private Beta to get Heat Trust heat networks registered with Ofgem

The committee asked for further information regarding private beta and the possibility of a bulk upload feature. This is something that was discussed at the members forum and has been fed back to Ofgem throughout testing. Although there is no guarantee, it is being reviewed for feasibility by Ofgem. Heat Trust confirmed rudimentary timings for completing registration and plans for ongoing collaboration with Ofgem. Heat Trust confirmed that private beta can be signed up to by any heat network operator and/or heat supplier via Ofgem's website and that once completed, it would be classed as formal registration. Heat Trust confirmed that the only exception to this is for heat networks using shared ground loops.

The Committee:

- a) NOTED the update.



9. Any other business

Heat Trust confirmed that they are currently interviewing for a secondee from Ofgem to join us with the intention of filling Kathryn's role.

Date of next meeting: Thursday 14th May 2026

