



**citizens
advice**

Citizens Advice Heat Networks Billing Best Practice Guide



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Executive summary

From 27 January 2026, the heat network sector transitions to a statutory regulatory framework overseen by Ofgem. Billing best practice, and effective support for consumers in financial difficulty is essential. Moving from a virtually unregulated market to one with minimum standards and consumer protections will no doubt be challenging. As the statutory consumer advocate, Citizens Advice is publishing this guide to provide practical steps that heat networks can take to go beyond the minimum requirements set out in the new authorisation conditions. A summary of our recommendations can be found [here](#).

Introduction

Citizens Advice assumed our role as the statutory advocate for heat network consumers in April 2025. Our Heat Network Advice Service, operating within the Citizens Advice Consumer Service, gives us a unique insight into the issues heat network consumers face. This evidence, alongside our research, is central to our work to put consumers at the heart of the new regulatory framework that goes live today.

The introduction of regulations represents a significant step forward. Their proper application, accompanied by well resourced and effective monitoring and enforcement, will improve outcomes for consumers over time. But regulation should be seen as a floor, not a ceiling. Protection gaps remain for unmetered consumers and for people who pay for heat alongside their housing, also known as ‘bundled’ consumers. We are also concerned about vulnerable consumers not being protected from disconnection outside of the winter months.

Bill satisfaction, joint with ease of contact, is a top predictor of overall consumer satisfaction with their energy suppliers in the mains gas and electricity market.¹ A good way for suppliers and the wider industry to drive consumer confidence in the sector is by being proactive in securing positive outcomes for their consumers. Good practice in billing can also reduce consumer confusion and therefore the burden on customer services and complaints handling teams.

A sustainable heat network sector needs consumer confidence. Industry therefore has a strong interest in driving positive consumer outcomes beyond the minimum set out in the new rules. This means providing consumers with accurate and regular bills, which are clear and allow consumers to connect their usage to their payments. When issues do arise, suppliers and operators should resolve them quickly. This best practice guide sets out the key areas where suppliers should drive best practice in billing, with some suggestions on how to achieve this.

Even with improved billing, historic prices and cost of living pressures mean that debt will remain an issue for heat network consumers. At the end of this guide we outline some best practice on managing debt through fair repayment plans and debt management practices. We may explore debt management in greater detail in a future best practice guide.

What are the new rules?

From 27 January 2026 the heat network sector moves to a formal statutory framework overseen by Ofgem. The new rules are delivered through:

Authorisation Conditions (ACs): The mandatory rules that heat network operators and suppliers must follow to operate legally.

Statutory Guidance: Consulted on and published alongside the ACs, this sets out how Ofgem expects operators and suppliers to comply with the ACs. This includes guidance on terminology, the scope and intended purpose of the ACs.

Advice, Advocacy and Redress: Consumers (since April 2025) have a right to seek independent redress from the Energy Ombudsman, and access to statutory advice and advocacy from Citizens Advice.

Why we need a billing best practice guide

Our unique qualitative research discovered heat network consumers in financial difficulty can experience significant price increases, unfair back-bills and aggressive debt collection practices.² Inadequate customer service can leave problems unsolved. And, in the most serious cases, households in vulnerable circumstances faced threats of disconnection and eviction due to their energy debts. Poor billing practices have also hit some of our clients hard. We called on Ofgem and DESNZ to make sure the new regulations help consumers avoid these problems.³

More than half (55%) of the cases our advisors have dealt with have been related to billing since our advice service went live in April 2025.⁴ This is unsurprising as 1 in 4 heat network consumers don't receive any form of bill or statement,⁵ nearly double the rate seen in the mains gas and electricity sector. Poor customer service and inaccurate billing pushes consumers into debt.⁶ As well as severe consequences for consumers in debt, this also has a negative impact on industry and other consumers, as unrecovered bad debt feeds through to higher bills.

Our data and insight

As the statutory consumer advocate for heat network consumers our recommendations are based on our unique data and insight.

This guide is accompanied by our [Heat Networks Data Pack](#) which provides a live evidence base for the standards we have set out. This pack is open access and automatically updates with our latest figures and trends. The data and insights are drawn directly from our Heat Networks Advice Service which went live in April 2025. Trends may change over time, but this provides a unique insight into the issues heat network consumers experience.



Moving from a virtually unregulated market to one with minimum standards and consumer protections will no doubt be challenging for the sector. Achieving a consistent standard of service, and improving outcomes across the sector will take time. Guidance will also be required by some suppliers throughout the process. This should be targeted given the range of organisations involved in the running of heat networks.

We want to continue working together with industry to improve outcomes for as many consumers as fast as possible. This is why Citizens Advice has published this best practice guide. The guide is designed to help suppliers think about how to achieve best practice in billing, and through this improve outcomes and drive consumer confidence. Efforts to prevent the build up of consumer debt will also improve outcomes for consumers and suppliers alike. We recognise that further guidance in this and other areas may be needed. This may involve the publication of future best practice guides as the sector adjusts to regulation.



Billing Best Practice

The principles of best practice in billing

1

Clear, timely, and accessible bills

- The format, content, language, and delivery of bills is accessible and understandable for all consumers.

2

Transparent usage and pricing

- How bills are generated (metering, tariffs, and usage data) should be clear and easy to understand.

3

Protection from retrospective billing and catch-up bills

- Long-term catch-up bills are a specific, high-harm issue. Here we share guidance on how industry can close this protection gap.

4

Fair and managed payment and debt practices

- If consumers fall into debt, fair repayment plans based on ability to pay are essential to support people who are struggling.

It's not just suppliers who need to think about best practice

Under Ofgem's authorisation conditions and statutory guidance, heat network operators (physical infrastructure) and suppliers (contract with the end user) can be treated as the authorised person. Although suppliers are more likely to be involved in billing, authorised persons are responsible for the actions of their representatives, which could include metering and billing agents.

This means that this guidance is relevant to the other entities who are involved in delivering heat network services. This includes:

- Metering and billing agents who often manage the day to day data and bill production
- Managing agents and social landlords, especially when heat charges are bundled with rent and / or service charges
- Energy service companies who operate the physical infrastructure.

In this guide we use the term 'supplier(s)' to capture this range of possible actors. Good practice in billing, regardless of the entity that performs the task, should go beyond the minimum standards defined in Ofgem's authorisation conditions and statutory guidance.

Clear, timely and accessible bills

To engage positively with their bills, heat network consumers must be able to clearly understand them. In essential markets, especially ones dominated by monopoly providers, consumers must be able to understand their bills, and have access to support to do so if required. Clear and accessible billing information provides consumers with the information they need to challenge any billing errors. It also helps to reduce complaints and customer service calls to suppliers about bill confusion.

The costs of being connected to a heat network are not always clear.² Evidence from our advice service shows that this can make it impossible for consumers to budget. Susie's story shows the impact of unclear billing, which left her with an outstanding debt of over £2,000.

Susie lived in a property connected to a heat network for a year, ending in 2025. In the first 6 months she didn't receive any bills, and wasn't given basic information such as the type of tariff she was on. After 6 months Susie did receive a bill but it was significantly larger than she had expected. This bill was found to be incorrect, with the wrong tariff applied, and another was issued a month later. This bill was also very high and Susie was expected to pay both bills within a month of receiving them. Although she was offered a repayment plan, this took a long time to materialise. Susie filled out a direct debit form with her provider but since then has received no confirmation and no money left her account. Some time later her provider sent her a bill for the full year of usage while she was in the property, which came to over £2,000. Despite Susie proactively contacting her provider to resolve the issue, the lack of clarity, irregularity and miscommunication of her bills has left her with an outstanding debt of over £2,000.

**names changed to protect client confidentiality*

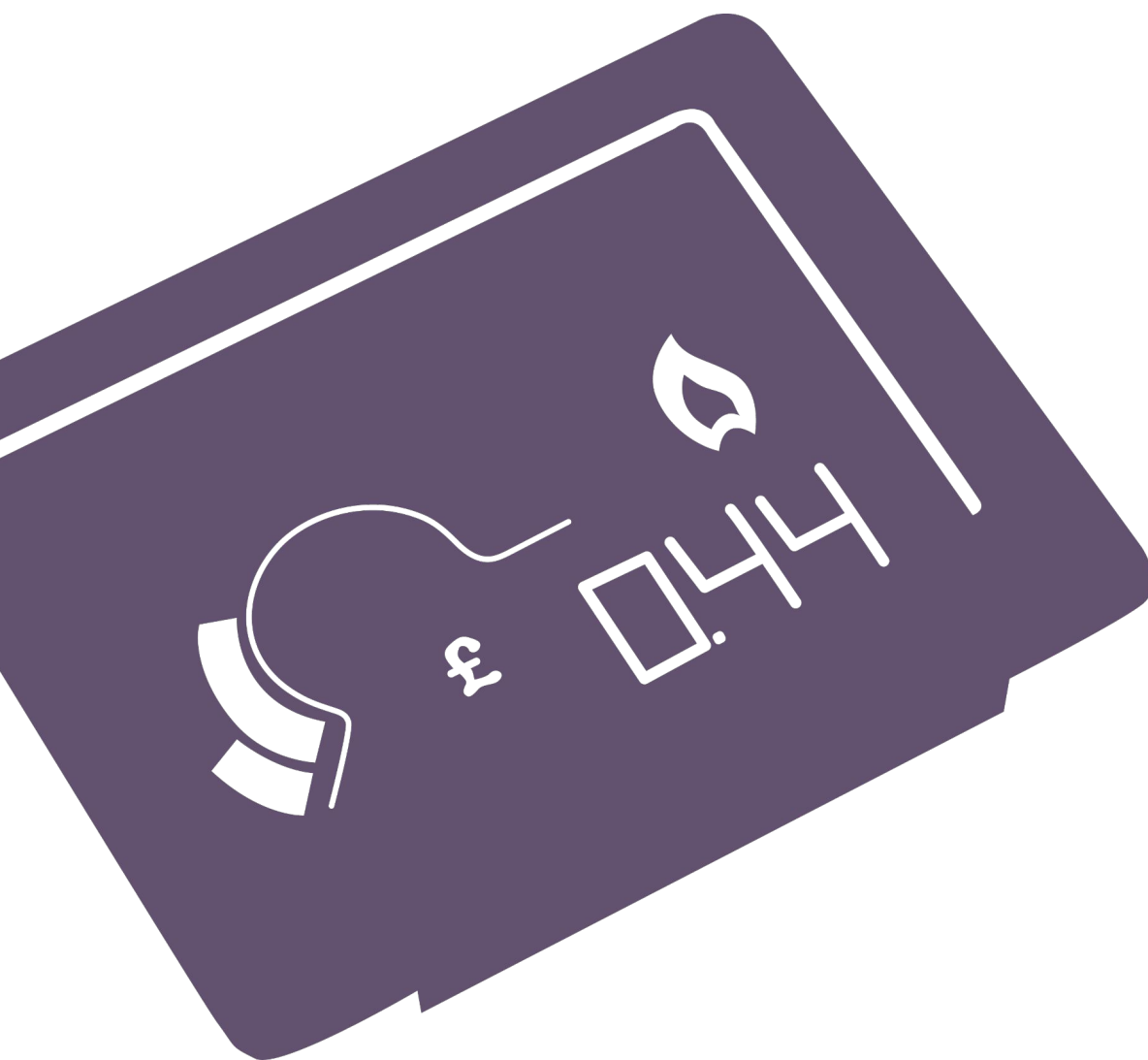


Ofgem's new rules state that suppliers 'should provide a clear explanation of the information contained in a Bill, including how the Bill was calculated (B6.9.3).'⁸ The rules also require authorised persons to consider consumer requirements, vulnerabilities or constraints as well as the Equality Act 2010.

This is a significant positive step for the clarity and accessibility of heat network billing. However, to ensure that consumers are able to fully understand and engage with their bills, suppliers should carefully consider how bills are communicated.

Clear and accessible billing alone won't solve affordability issues for heat network consumers.⁹ But when consumers can understand their bills, then they are empowered to identify problems sooner and seek support from suppliers and advice services. The aim should be to allow people to raise issues early, and seek support before things hit crisis point. It's vital that heat network operators, suppliers and billing agents give consumers bills that are accurate, timely and easy to understand. All consumers, especially those who could be in a vulnerable situation, should benefit from billing clarity.

Where practical we encourage heat network suppliers to take time to understand their customer base, and design and test the billing and communication that works best for them. While we encourage suppliers to develop their bills and communication in ways which best work with their customer base, the following are some suggestions to make bills easier to understand and engage with.



Recommendations to make bills clear, timely and accessible

Consumers should be able to understand the language used in bills. Bills should provide an explanation of any acronyms, by signposting to the supplier's or Ofgem's website, or if appropriate, within the bill itself.

If a customer is on a repayment plan this should be clear on the bill. This should be clearly separated from day to day usage and set out the amount of debt outstanding, the rate of collection, how and when it will be collected, and when the agreement is due to end.

Services need to be simple and accessible to everyone. For instance, suppliers should have non-digital alternatives available to those who might be digitally disadvantaged. This might include paper billing or the provision of a phone line.

Suppliers should also take steps, where practically possible, to understand the preferences of their customer base and provide information in other formats if needed. These could include video and audio content, websites, information pages, apps, webinars, braille, paper based and SMS, to increase accessibility.

Suppliers should create, maintain and promote a priority services register. This should be used to tailor bills and other communication to the needs of consumers, including but not limited to some of the alternative means described in the previous two points.

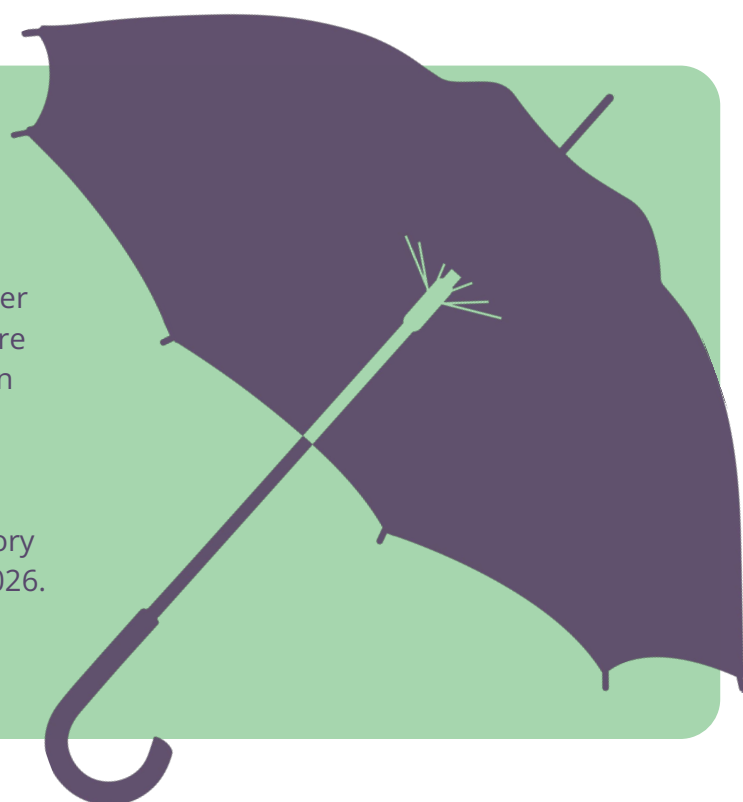
Suppliers should provide explicit signposting for complaints and redress. Suppliers should clearly state how consumers can get in touch with them for queries or complaints. Another way suppliers can get this right is by proactively engaging with relevant consumer advice bodies to make sure consumers receive the correct information to access advice.

Suppliers should continually evaluate their communications with consumers. Where practical this should involve testing with their consumers, and proactively identifying any gaps.

Priority Services Register

What is a Priority Services Register? Mains energy suppliers, energy networks and water companies already keep a list of customers who require extra support. This is known as a Priority Services Register (PSR). The PSR helps identify customers who require services such as providing information or bills in an accessible format, and priority support in an emergency such as a power cut.

The creation and maintenance of a PSR is a statutory requirement for heat networks from 27 January 2026. An up-to-date PSR will help suppliers meet their customers' needs.



Transparent usage and pricing information

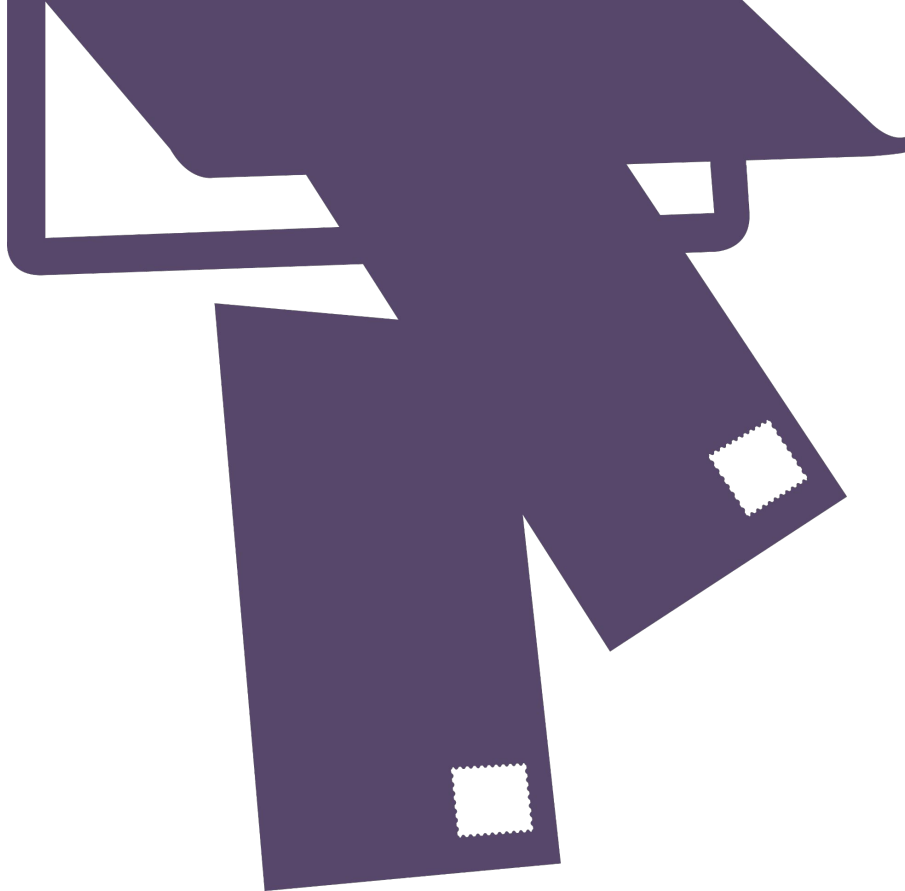
The failure to bill regularly and accurately can lead to high catch-up bills and debt. Beyond the content and delivery of bills, it's also essential that the basis for charges are accurate and verifiable. Accurate billing allows consumers to link their bills to their day to day usage, while frequent bills reduce the likelihood of large unexpected bills.

Some consumers who contact our advice service have received large, unexpected bills which have left them in severe financial hardship. Agnes' story shows the result of an inaccurate bill and its knock on effects.

Esme contacted Citizens Advice on behalf of her mother, Agnes. Agnes is elderly and has health issues, which means that under Ofgem's new rules she could be considered as being in a vulnerable situation. Agnes has had a series of issues relating to her heat supply. In 2018 a pipe burst, flooding her home and leaving her with burns. More recently, in January 2025, a debt of nearly £700 was placed on Agnes's account, accompanied by a threat of disconnection. Agnes and Esme think this happened because of an incorrectly installed meter, and they sought advice from a plumber who confirmed that this was the case. Although Esme contacted Agnes's local MP for support, her supplier told the MP that there was no issue. Despite Esme and Agnes's efforts to resolve the issue, Agnes has been left with no heating during the winter months, and a high outstanding debt.

**names changed to protect client anonymity*





Some of the issues that contributed to the severity of Agnes's case should be improved by the introduction of regulation this January, including improvements in the treatment of consumers in a vulnerable situation. It's clear that issues with the accuracy of bills that heat network consumers receive can have a significant impact on the physical and financial wellbeing of consumers, especially those in a vulnerable situation.

Ofgem's authorisation conditions, 'billing frequency and method' (B6.11-17) include rules about how often authorised persons must issue bills (quarterly when electronic, twice a year otherwise). The rules state that at least once a year suppliers must issue a bill based on actual rather than estimated consumption (B6.4).¹⁰

However these rules don't apply to unmetered consumers, who make up a large proportion of heat network consumers.¹¹ This means that there remains a significant gap for unmetered consumers in the authorisation conditions as they stand. The Heat Network Technical Assurance Scheme should begin to address the lack of metering. But upgrades to physical infrastructure, like metering, will take time to implement. Therefore the sector needs to see stronger minimum standards in billing accuracy for unmetered consumers in the interim.¹²

Ofgem's rules also allow suppliers to depart from actual-use billing where older leases (pre-27 November 2020) prevent consumption-based billing, even where individual meters are installed (B6.6.2).¹³ Similarly, where heating payments are bundled within service charges, the frequency and content of billing may follow the terms of the lease rather than the authorisation conditions (Part two of B6).¹⁴ This is concerning because service charges are often opaque and unaffordable.¹⁵ We've called for the new service charge demand forms (proposed by MHCLG) to mirror Ofgem's requirements as closely as possible to ensure all heat network consumers benefit from improved billing.¹⁶

Consumers not being billed on actual usage is unacceptable and, like unclear bills, irregular billing makes budgeting impossible. We recommend the following best practices to ensure that the data that informs charges are accurate, and that charges are communicated with tools that help consumers to relate their usage to their bills.

Transparent usage and pricing

Suppliers should make sure consumers know whether they are being billed on actual usage or not, and what this means for their bills. For instance they should inform consumers that if they are unmetered then their bill won't be reduced if they ration their energy usage.

Where there isn't a meter suppliers should ensure that consumers are billed at least annually.¹ It's essential that unmetered consumers aren't faced with long term catch up bills. This also ensures that consumers get regular access to the other information that bills provide, including information on advice and how to access redress.

Suppliers should take steps to ensure that consumers have an understanding of how unmetered bills are calculated. This could include costs and how they are broken down between consumers, potentially using border usage information. Suppliers should test and iterate how this information is communicated.

Where there is a meter, suppliers should issue reminders to consumers to submit a reading at least quarterly, and attempt to take readings themselves if consumers don't provide them. Regular bills are essential to help consumers link their usage to their bills, budget and ultimately mitigate the financial hardship caused by long term catch up bills.

Suppliers should use various tools to help people understand what their usage might look like. These will need to be carefully designed and tested to ensure that they aren't misinterpreted, especially where projections are used. Suppliers should let consumers know what type of meter they have, and provide information on what this means for them and their bills.

Suppliers should include an explanation of tariffs. Under Ofgem's new rules they will need to provide information on details like standing charges and unit rates. Suppliers should think carefully about how they explain what these mean. If there is a choice of tariffs and payment options, this should be made clear.

Where heating and service charges are bundled, suppliers should ensure consumers have clarity on how their bills break down. Service charge demand forms should include detailed bill breakdowns. This includes clearly breaking down individual heating and hot water costs and heating of communal areas. Any costs towards management and maintenance of heat network infrastructure in new service charge demand forms should also be included.



Protection from catch-up bills

We know that shock catch-up bills can have a significant impact on people's ability to pay for their essential costs. 42% of calls about billing issues to the Heat Networks Advice Service in 2025 involved a consumer receiving a catch-up bill.¹⁸

Shock bills can have serious consequences for consumers. Energy prices remain at high levels, and we know that many consumers are living on empty, with little to no ability to pay high unexpected bills.¹⁹ As Martin's story shows, this can impact people's ability to meet their essential costs. In some cases this can lead to disconnection and even, when housing costs are bundled with heating, eviction. Long term catch-up bills also harm suppliers. They can cause consumers to fall into debt, which has a negative impact on the wider industry as unrecovered debt accumulates. This is why we have called for the government to close a current loophole which excludes bundled customers from new protections that limit back-billing to 12 months.²⁰



Martin contacted Citizens Advice after receiving a catch-up bill of nearly £20,000 from his provider. He has lived in his apartment for 5 years, and throughout that time thought that his payments to *well known UK energy supplier* covered all of his heating costs. Martin was only made aware that he was on a heat network when he received the bill. Our adviser informed Martin that he may be protected from back-billing from longer than 12 months ago, if his supplier is a Heat Trust member. If this is not the case Martin could be stuck with his high bill.

**names changed to protect client anonymity*

Ofgem's authorisation conditions state that charge recovery actions (catch-up bills and other recovery charges) must be limited to the 12 preceding months (B7.1).²¹ This is a positive step for heat network consumers, preventing in some cases the long term catch up bills like the one Martin received. However, the 12 month limit on back-billing won't apply when heating and housing costs are bundled. These consumers could be back-billed for heating used up to 18 months previously or even longer if there's a delay in the landlord incurring costs. This is why we're sharing the following guidelines on catch up bills.

Recommendations to protect consumers from catch-up bills

Avoid long, unexpected catch-up bills. A good way to do this would be to bill consumers at least every 6 months. Suppliers should also request meter readings at least quarterly.

Suppliers should commit to not back-billing consumers for longer than 12 months even where heating and housing costs are linked. Bundled consumers should have the same protections as those who pay their heating and hot water bill separately.

Consumers should understand why they have received a catch-up bill. To do this suppliers should clearly explain catch-up bill, including the period it covers, tariff details, and why the bill has been issued.



Fair repayment plans and proactive debt management

Improving billing accuracy and communication should help to prevent debts building up. Even with improved billing, historic prices and cost of living pressures mean that debt will remain an issue for heat network consumers.

For heat network consumers, who are often on lower incomes and have less access to financial support,²² arrears can quickly become insurmountable. Bills are also likely to be significantly higher for some heat network consumers. The consequences of debt can also be more severe, with those who have their heating and housing costs bundled at risk of eviction if they fall into arrears. To prevent consumers in arrears from reaching crisis point, improvements in billing must be combined with fair repayment plans and proactive debt management.

Ofgem's new rules represent some key positive steps for how heat network suppliers treat consumers in financial difficulty. From January, suppliers must make proactive contact at the earliest opportunity to identify whether a domestic consumer is in payment difficulty (B9.5). Contact must also be made no later than after 2 consecutively missed monthly payments, 1 missed quarterly payment, or if the consumer flags an inability to pay.²³

Suppliers will now have to take steps to understand consumers' ability to pay, and take this into account when calculating installments (B9.7).²⁴ Any repayment plans must offer consumers the ability to pay in installments, with the payments regularly reviewed and paused or adjusted if the consumer's circumstances change (B9.8.4).²⁵ The rules also state that staff must be given clear training on how to identify consumers who are struggling to make payments (B9.8.3), and that incentives must be linked to successful consumer outcomes rather than repayment rates (B9.8.1).²⁶ We welcome these changes, but we would also recommend that suppliers use a Standard Financial Statement (SFS), and that they accept debt assessments from accredited providers, such as Citizens Advice.



New protections state that suppliers must not disconnect people who could be in a vulnerable situation during the winter months (9.14).²⁷ This is positive, but we would like to see consumers who could be in a vulnerable situation protected from disconnection all year round. We see this as best practice, and a clear example of where suppliers should go further than the minimum standards set out by the new rules. This would also bring practice in the heat network sector closer to that found in the mains gas and electricity sector, where disconnection for debt is rare.

The new rules also include new guidance on self-disconnection. Under Condition 11 of the ACs, Ofgem states that the authorised person must 'take all reasonable steps to identify on an ongoing and continuous basis' whether a consumer is self-disconnecting (11.1.1).²⁸ This means that suppliers must pay careful attention to their consumers. They must identify issues early and provide support, including emergency credit, especially for those that they have identified as potentially being in a vulnerable situation. The conditions also state that prepayment meters should only be used if it would be 'safe and reasonably practicable' (10.2.2).²⁹ We welcome this, but suppliers should ensure they allow consumers the option of switching to another payment method after the debt has reached an acceptable level.

To go beyond the positive changes included in the new rules, we have outlined the following steps that heat network suppliers and all those bodies involved in delivering heat network services can take to help consumers manage debt.



Recommendations for fair repayment plans and proactive debt management

Suppliers should carefully consider how they assess the ability of a consumer to pay. As well as the new rules on staff training and incentives, suppliers should also use a Standard Financial Statement (SFS),³⁰ and accept debt assessments from debt advice providers, including Citizens Advice.

Suppliers should ensure that consumers know how to access advice. Suppliers should signpost on bills to the Citizens Advice Heat Networks Advice Service, and appropriate sources of free debt advice.³¹ For Heat Networks in Scotland, suppliers should signpost to Advice Direct Scotland.³² Suppliers should engage with advice providers to ensure that the signposting they provide is up to date. Suppliers should have policies in place to support communication with third-party debt advisers acting on behalf of customers.³³

If the supplier provides different options for how the consumer can pay, these different methods should be highlighted and explained. A good way to do this would be to include this on any statement of arrears, as well as in the separate section for repayment plans on bills that we recommend under 'Clear, timely and accessible bills.'

Suppliers should protect consumers in vulnerable situations from disconnection all year round. Individuals in a vulnerable situation can see serious impacts from disconnection all year round, and need a reliable source of heat and hot water outside of the winter months. The creation and maintenance of a Priority Services Register is a good way to ensure that consumers in a vulnerable situation get the support they need year round.

Suppliers should include assessment of whether a consumer is in a vulnerable situation when considering whether it would be safe to install a prepayment meter. A good way to do this would be to consult the priority services register that suppliers are now required to create and maintain.

Suppliers shouldn't unreasonably refuse or delay switching to another payment method if requested. For consumers in debt on a prepayment meter, suppliers should allow consumers to switch after the debt has reached an acceptable level, or if a prepayment meter is found to be unsuitable.

Suppliers should continually monitor and evaluate their debt collection and support processes and policies. To do this they should assess against their achievement of positive consumer outcomes. Reassessment should also happen if any factors change, for instance if bills increase significantly, or the regularity and severity of consumer complaints increases.

The Citizens Advice consumer service can help you if you are a heat network customer. Whether you're having trouble with your supplier, struggling to pay your bill or have another question, the Citizens Advice specialist heat network advisers can help.

Call the consumer service on **0808 223 1133** (Monday to Friday 9am to 5pm). Calls from mobiles and landlines are free.

Visit citizensadvice.org.uk/consumerservice for more information.



Notations

1. Citizens Advice and Ofgem, [Factors shaping overall satisfaction with energy suppliers](#), 2025.
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4. Since this service only launched in April 2025, this is based on a relatively small number of clients - trends may change over time. [Flourish Dashboard](#)
5. Department for Business, Energy and Industrial Strategy, [Heat Network Consumer and Operator Survey](#), 2022, page 44.
6. Citizens Advice, [The debt protection gap: Identifying good practice and policy solutions to improve support for consumers in debt](#), 2024.
7. Citizens Advice, [System Critical: No margin for error in new heat network rules](#), 2025.
8. Ofgem, [Heat networks regulation: authorisation conditions](#), 2026.
9. Citizens Advice, [Is there a hidden affordability crisis in the heat networks sector?](#), 2024.
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11. Citizens Advice, [Priorities for heat networks consumer protections](#), 2025.
12. Ibid.
13. Ofgem, [Heat networks regulation: authorisation conditions](#), 2026.
14. Ibid.
15. MHCLG, [Strengthening leaseholder protections over charges and services](#), 2025, 1.0.
16. Citizens Advice, [Response to Strengthening leaseholder protections over charges and services](#), 2025.
17. Citizens Advice, [Citizens Advice response to Ofgem and DESNZ's joint consultation on implementing consumer protections for heat networks](#), 2025, page 33.
18. Since this service only launched in April 2025, this is based on a relatively small number of clients - trends may change over time. 23.7% and 18.6% of cases under the headline billing error include 'back-billing code (potential breach)' and 'catch-up bill received' respectively.
19. Citizens Advice, [The National Red Index 2025: negative budget households face a debt crisis like quicksand](#), 2025.
20. Citizens Advice, [Priorities for heat network consumer protections](#), 2025.
21. Ofgem, [Heat networks regulation: authorisation conditions](#), 2026.
22. The current rules for the [Warm Home Discount Scheme \(WHD\)](#) state that customers who do not pay directly for energy are ineligible. This locks out many heat network consumers from support because they don't have a direct relationship with their energy retailer, instead paying their heat supplier e.g. a local authority, housing association or building owner.
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24. Ofgem, [Heat networks regulation: authorisation conditions](#), 2026.
25. Ibid.
26. Ibid.
27. Ibid.
28. Ibid.
29. Ibid.
30. Money Advice and Pensions Service, [Standard Financial Statement](#).
31. Citizens Advice, [How a new Citizens Advice service will help tackle the mountain of energy debt](#), 2025.
32. Advice Direct Scotland, [Heat Networks](#).
33. Citizens Advice, [Closing the Loop: Building strong creditor-adviser communications](#), 2026.