

HEAT NETWORKS TECHNICAL STANDARDS INTRODUCING A HEAT NETWORK TECHNICAL ASSURANCE SCHEME (HNTAS)

CIBSE Response
15 April 2026

Question 1: Do you agree with the proposed approach to not include the Consumer Heat System in scope of HNTAS after the construction phase? If not, can you please suggest an alternative approach and set out your justification.

CIBSE agree with the need to limit consumer intrusion post-construction. However, excluding the Consumer Heat System risks undermining system performance and consumer outcomes over time. We recommend reviewing options for monitoring of performance parameters which could reflect degradation of performance on the consumer side and, in turn, affect system performance e.g. return temperatures, ΔT .

Question 2: Do you support the use of 6 properties or more for domestic-only networks, or the connection capacity equivalent for non-domestic/mixed use networks, as an appropriate minimum heat network to which HNTAS participation would be mandatory for new networks after scheme go-live? Please provide reasoning for your answer and, if your answer is `no` please provide an alternative approach.

CIBSE disagree. While this may concern only a small number of consumers, the impact on these consumers could be significant. All consumers need to be protected, including those who happen to be on a smaller network.

The requirements could potentially be phased and/or reduced, covering key performance requirements which protect consumers, but small networks should not altogether be excluded. An additional way to introduce phasing or graduality in the requirements, and as suggested in the forums run by DESNZ in 2025, could be to treat differently the operators which are in charge of a single, small, network, for which the compliance burden may genuinely be significant, vs those which are in charge of several, albeit small, networks, to which earlier and fuller requirements could apply.

Question 3: Based on the trade-offs between the benefits and costs of bringing smaller networks in scope of HNTAS, what, in your view, is the appropriate minimum heat network size to which HNTAS participation would be mandatory for existing networks? If this differs from the proposed use of 11 properties for domestic networks, or the connection capacity equivalent for non-domestic/mixed use networks, please provide supporting evidence and justification.

See Q2: we do not think networks should altogether be exempt on the basis of size, due to the impact on consumers. Furthermore, the proposed threshold of 11 properties would leave 24% of networks excluded – this is significant.

Question 4: Do you consider there to be need to subject existing networks with between six and ten properties to minimum network performance and monitoring requirements, or any other HNTAS requirements? What do you consider to be the implications of doing so?

Yes – see Q3.

Question 5: Do you agree with the proposals for minimum network measurement and that industrial networks (as defined above) should be exempt from HNTAS at scheme launch? Please give reasons why you agree or do not agree with the proposal.

No. As for domestic consumers, non-domestic consumers must be protected due to potentially significant impacts on profitability and competitiveness e.g. unduly high heat energy costs could affect the operating budget of a school or the profitability and competitiveness of a small (or large) business. Networks should not be altogether exempted on the basis of their size. With regards to industrial networks, CIBSE agree for this stage, but regulation of industrial heat networks should ultimately be considered, due to their impacts including energy use, carbon emissions, and impact on businesses.

Question 6: What, in your view, are the implications of including consumer heat pumps on Ambient loop and Shared Ground Loop networks within HNTAS past the design and construction phases? If you think an alternative approach is needed, please provide details and reasoning, including (if applicable) if this differs with respect to new build networks and existing networks.

CIBSE agree with including them post construction phase, even if they require a dedicated approach, due to their integral role in the performance of the whole system. CIBSE members have expressed concerns about the current treatment of ambient loop systems, with insufficient or inadequate coverage of these typologies within Technical Standard 1. We will be providing detailed comments as part of our response to TS1 in the separate consultation ending May 2026.

Question 7: Do you agree or disagree with our proposed governance structure, and in particular with the appointment of a Code Manager? Please provide reasons for your response.

CIBSE would welcome information on how the accountability and independence of the Code Manager would be guaranteed. This is essential, to ensure strong technical standards and performance, and protect consumers. For example, the only link between Ofgem and the Code Manager, in the structure diagram of section 4.1, is about data sharing. There must be oversight of the Code Manager.

Question 8: Do you agree or disagree with the need for a Code Management Committee and sub-committees to ensure the views, interests and experiences of those involved in, or impacted by, HNTAS are taken into account to further evolve and improve the scheme? Please provide reasons to support your views.

Yes, but this would not be sufficient: see Q7.

~~Question 9: Do you support our proposal for the Code Manager to be housed within DESNZ initially, whilst we work through long term governance options? Please provide a justification for your answer.~~

~~Question 10: Do you support our proposal to recover 100% of the Code Manager's costs through the gas and electricity licence fee mechanism in the short term? Please give reasons or supporting evidence for your answer and clearly outline any alternative proposals.~~

~~Question 11: Do you support our proposal to recover the Code Manager's costs through a blend of gas and electricity licence fees and fees from the heat network~~

~~sector in the longer term? Please give reasons or supporting evidence for your answer and clearly outline any alternative proposals.~~

~~Question 12: Do you support the preferred approach of a Deed Poll relationship between heat network operators and the Code Manager?~~

Question 13: Do you agree with the proposed approach of KPIs, Statements of Conformity and assessment gateways that will ultimately contribute to certification? Please give reasons why you agree or do not agree with the proposal.

Yes and no:

- We agree with the approach moving from validation to verification after Stage 5 i.e. verifying that outcomes have been achieved, rather than validating that they can be achieved.
- It is not clear what will happen at each gateway, if the KPIs are not achieved: if certificates are not issued due to failure to meet the KPIs, what are the further recourses available to Ofgem or others, if the project continues to go ahead? The consultation further down talks about remedies such as removal of certificates, but this applies to operating networks rather than those at the design / construction phase.
- We strongly recommend that given the central role of carbon reduction in the promotion of heat networks, carbon performance should be added as a KPI – see our response to Q76.

Question 14: Do you agree with the gateways for new build heat networks being at the end of design, then end of construction/commissioning, followed by proof of measured in-use performance after 2 years. If you disagree, please suggest an alternative approach and set out your justification.

No, there is a crucial stage missing: Feasibility, as included in CP1, before Concept Design. Whether a heat network is the right solution to deliver key outcomes such as consumer costs and carbon emissions must be assessed, and should be part of HNTAS (especially if HNTAS continues NOT to include carbon performance as part of its KPIs). This could be a relatively “light” Gateway, but should be included.

~~Question 15: If you anticipate that introducing HNTAS will have any impact on the Government’s housing supply ambitions please provide expected impacts with reasoning and evidence to support your answer.~~

Question 16: Do you support the proposed milestones for existing heat networks given in Table 6, or do you think there is a case for the final certification standard to be set at Milestone 2? Please provide reasons for your answer including your assessment of the impact on consumers of your preferred option.

We agree that final certification should be set at Milestones 4 and 5 i.e. after meeting performance requirements. Setting them at Milestone 2 i.e. before an improvement plan has even been produced, would be counter the stated objectives of driving improvements to the performance of existing networks.

Question 17: Do you agree with the milestones for existing networks? If you think there is a case for requiring these milestones for existing networks to be met more quickly or more slowly, please give details to explain your answer.

They seem generally reasonable, although some performance requirements (Milestone 4) could arguably require some time in operation (for example, average annual carbon content

of heat, if this was added to the KPIs as per CIBSE's recommendation), while some operational requirements (Milestone 5) could be verified beforehand.

~~Question 18: What is your estimation of the cost of meeting the Milestone 2 and Milestone 4 requirements? Please provide information such as the size, age, and number of consumer connections on your network to help contextualise your estimates. Please also indicate if your network is fully metered.~~

~~Question 19: If not already provided in your answer to question 18, what is your estimation of the costs this approach would create for private landlords, registered providers of social housing, leaseholders or their respective tenants? Are there any particular scenarios we should be aware of? Where possible, please provide quantitative evidence to support your answer.~~

~~Question 20: Do you think our proposed treatment of Mixed Age heat networks is effective in appropriately applying different assurance pathways to newer and older parts of a heat network? Please provide reasons for your response.~~

~~Question 21: Do you agree that the HNTAS Metering and Monitoring Standard should cover both the monitoring points and the Automatic and Remote Monitoring Systems (ARMS)? Please provide reasons for your answer.~~

~~Question 22: Do you agree that the HNTAS Metering and Monitoring Standard should also cover smart metering systems and a Metering and Monitoring Strategy? Please provide reasons for your answer~~

~~Question 23: Do you agree with the proposed metering milestones and timelines for existing networks? Do you agree that they allow sufficient time for installation while ensuring consumer outcomes and network performances can be improved as soon as practicable? If you disagree, please set out your reasons and a justification for an alternative proposal.~~

~~Question 24: Do you agree that "smart meter" requirements should also be mandated, and included in the HNTAS metering and monitoring specifications?~~

~~Question 25: Do you agree with our proposal to disallow the use of wired M-Bus, and other unencrypted communication protocols, on new heat networks with remote disconnection capability from the point at which HNTAS commences?~~

~~Question 26: Do you agree with our proposal to allow the continued use of unencrypted communication protocols, where they are already in place on existing systems, until either the first HNTAS certificate deadline, or until meters reach the end of their life (whichever is soonest)?~~

~~Question 27: Do you agree that unencrypted systems with remote disconnect should have the function removed or meters/protocol be replaced as soon as possible and within five years after HNTAS commences?~~

~~Question 28: Do you agree with our approach to set the minimum level of accuracy at the equivalent of at least Class 2 of the MID 2014?~~

~~Question 29: Do you agree that ongoing testing and recalibration is required for existing networks?~~

~~Question 30: Do you agree with the proposal to extend metering requirements to existing buildings of supported housing, almshouse accommodation and purpose-built student accommodation, so that they can be covered by HNTAS?~~

~~Question 31: Do you think HNTAS requirements, including metering requirements, should be applied to buildings with leasehold related HNMBR exemptions? Please provide reasons for your answer.~~

~~Question 32: What options do you think should be explored to better enable the adoption of consumption-based billing in buildings with leasehold related HNMBR exemptions?~~

~~Question 33: Do you foresee any challenges arising from the installation of metering and monitoring systems and/or the undertaking of performance improvement works to meet HNTAS requirements in networks supplying leasehold customers? Please provide potential solutions to these challenges.~~

~~Question 34: Do you agree with the proposal to disallow the use of heat cost allocators to demonstrate compliance with HNTAS requirements? Please give reasons why you agree or do not agree with the proposal.~~

Question 35: Do you have any comments on our proposal to provide heat network operators powers of entry to conduct necessary maintenance of heat network equipment for health and safety reasons, meeting required technical standards and to install and maintain metering systems?

CIBSE agree, provided that adequate consumer safeguards are in place.

Question 36: Do you have any comments on our proposal to provide the HNTAS Code Manager with powers of entry to enable meter accuracy activities to be conducted, replicating the powers of entry currently provided to OPSS under HNMBR?

CIBSE agree, provided that adequate consumer safeguards are in place.

Question 37: Do you have any comments on our approach to provide necessary and proportionate protection to customers regarding the use of power of entry?

CIBSE agree, if these replicate protections in place in the electricity and gas markets.

Question 38: Do you agree that heat networks which have not yet submitted planning applications at the point of HNTAS commencement should be subject to the same requirements and assurance pathway as new build networks? Please provide reasons for your answer.

Yes.

Question 39: Do you agree that heat networks which have already submitted planning applications but have not yet signed M&E construction contracts at the point of HNTAS commencement should be subject to the new build requirements and assurance pathway from stage 3 (i.e. technical design) onwards? Please provide reasons for your answer.

This seems reasonable and will avoid the need for future retrofitting.

~~Question 40: Do you agree that two years from completion is an appropriate timeframe to base the decision on the appropriate entry point at which pre-operation heat networks would join the existing network assurance pathway? Please provide reasons for your answer.~~

~~Question 41: Do you agree that pre-operation heat networks should register to a shorter deadline than other categories of heat network? Please provide reasons for your answer.~~

Question 42: Do you support the proposal to permit non-conformities in certain circumstances where non-conformities are unavoidable and have a negligible impact on heat network performance?

We agree in principle, but what constitute a “negligible” impact on performance must be clearly defined, and should genuinely be negligible. We are concerned that the example provided in the consultation (that of a heat network with losses higher than conformity) could have far-from-negligible implications on costs for consumers. Requiring remediation plans with a timeline for conformity should also be considered as part of the process for granting non-conformity.

~~Question 43: In addition to physical constraints and specific technology applications, are there any other categories of non-conformities that you think should be permitted? We are interested in suggestions where permitting non-conformities would have little impact on network performance and would not negatively impact consumer outcomes.~~

~~Question 44: Do you support the process outlined for duty holders to submit, and assessors to grant, a dispensation for permitted non-conformities?~~

~~Question 45: Do you support the process outlined for the handling of non-conformities present at assessment?~~

~~Question 46: Do you support the process outlined for the handling of non-conformities present at certification?~~

Question 47: Do you agree with the milestones for End of Life heat networks? If you think there is a case for requiring these milestones to be different, or to be met more quickly or more slowly, please give details to explain your answer.

It is not clear from the consultation proposals what protections there are against networks simply declaring themselves as “end of life” and using this for an unduly long period of time, to avoid having to comply with HNTAS:

- Granting “End of Life” status must be associated with a commitment to replace or upgrade the network, and
- the period during which a network can use its “End of Life” status to avoid compliance must be clearly bound in time.

~~Question 48: What is your estimation of the impact HNTAS will have on heat network insolvency and market exit risks? Do you agree that the risk is low and manageable? Further to existing proposals, what mitigations would you suggest?~~

~~Question 49: Do you have views on how, in the event that a heat network has failed to engage with the End of Life process, exhausted commercial options to exit the~~

~~market, and where these prevailing incentives have not led to another interested party 'stepping in', policy can support market led insolvency arrangements?~~

Question 50: Do you agree with the general approach set out in the data hierarchy (pyramid) above?

CIBSE strongly recommend a public register of heat network performance. Some details may be left out, but essential information such as energy and carbon performance, heat costs (including standing charges) must be made available and easily accessible to the public. See our response to the 2023/4 heat networks consultation for details.

Question 51: Do you support the development of a 'golden thread' of evidence throughout a network's life, to ultimately be maintained by the heat network operator?

Yes, alongside essential information being ultimately retained by the Code Manager and Ofgem, so that it is not wholly reliant on the operator (e.g. to address occurrences of insolvency and market exit, where information may otherwise become unavailable).

Question 52: Do you agree with the appointment of duty holders (Designated designer, Contractor and operators) to ensure responsibilities are clear at each stage?

Yes in principle.

~~Question 53: Do you agree with the proposed assessment stages, and the roles for assessors and Assessment Organisations set out? If not, please provide details.~~

~~Question 54: Do you agree with the proposed approach of registered Assessment Organisations issuing Statements of Conformity at various stages of a heat network's life?~~

~~Question 55: Do you agree that accreditation of assessment activities should be divided in the way set out? Do you have any views on the minimum experience and qualification level for each assessment activity? Please provide details.~~

~~Question 56: Do you agree with the application process for individual assessors? If not, then please provide details.~~

~~Question 57: Do you agree with the proposed assessor oversight, training and re-accreditation processes set out? If not, please provide details.~~

~~Question 58: Do you agree with the proposed accreditation process for Assessment Organisations? Do you have any views on the minimum requirements for Assessment Organisations? Please provide details.~~

~~Question 59: Do you agree with the proposed Assessment Organisation oversight and re-accreditation processes set out? If not, please provide details.~~

~~Question 60: Do you agree with proposals to allow second-party execution of assessment activities under HNTAS? Do you agree that project specific consultancy advice should be permitted where it helps ensure standards are met? If not, please provide details.~~

~~Question 61: Do you agree with the proposed certification process and timings, and the role of certifiers set out? If not, please provide details.~~

~~Question 62: Do you agree that HNTAS certification function should be carried out by a single, centralised Certification Body, that is an appropriately qualified body, appointed by the Code Manager?~~

~~Question 63: Do you have any views on the criteria or process for individual HNTAS certifiers? If so, please provide details.~~

Question 64: Do you agree with our proposed arrangements for handling complaints against and non-compliance of heat network operators? Do you consider that remedies other than withdrawal of certificates, such as financial penalties on non-compliant heat network operators, would be appropriate?

Yes, these remedies must be considered alongside removal of withdrawal of certificates.

~~Question 65: Do you agree with our proposed arrangements in handling complaints and appeals against Assessment Organisations? Are there any other factors you think we should take into consideration in how complaints and appeals against Assessment Organisations are handled?~~

~~Question 66: Do you agree with our proposed arrangements in handling complaints and appeals against the Certification Body, Training Provider and Scheme Operator? Are there any other factors you think we should take into consideration in how complaints and appeals against these entities are handled?~~

Question 67: Do you agree with our proposed arrangements in handling complaints and appeals against the Code Manager?

There is only little information provided to be able to respond fully to this question. In principle we support the introduction of a complaints procedure with possible escalation up to the Secretary of State. In the interim steps:

- Ofgem as the regulator should be involved
- review by a Technical Group could be useful as first steps, but this will very much depend on the independence of the Code Manager and Technical Group from each other – see also our response to Q7. The proposed governance structure shown in section 4.1 does not include the stated Technical Group, so it is not possible to gauge this e.g. a Technical Group largely appointed by, or with close relations to, the Code Manager, may not provide the required independence. We recommend reviewing the possibility of introducing a separate steering group, which would not be involved as closely in technical development issues, but could provide independent advice on complaints.

Question 68: Do you agree with the proposed measures against the Code Manager to ensure that the Secretary of State is able to intervene in cases of poor performance?

Potentially, but little information is provided in the consultation document to be able to answer fully to this question.

~~Question 69: Do you believe that there is a need for additional grants and/or financial support for installing particular types of equipment to support HNTAS. If so, what types of equipment would you propose?~~

~~Question 70: Do you believe there is a need for additional grants and/or financial support for services undertaken as part of HNTAS? If so, what types of services would you propose?~~

~~Question 71: Do you believe there is a need to encourage early movers toward HNTAS certification. If so, what form would incentives take and when would these need to be applied?~~

~~Question 72: Do you believe there is a need for subsidised training to support all the above? Please specify what you believe are the key skills gaps.~~

~~Question 73: Please suggest any other types of incentives not considered above that could assist existing heat networks in becoming compliant with HNTAS?~~

Question 74: Do you agree that incentives should focus on supporting and encouraging existing heat networks as they are likely to have a more difficult transition pathway to meeting HNTAS requirements?

Yes.

Question 75: Do you think introducing this type of strengthened and targeted framework could help the heat network sector? Are there other areas that could form part of the frameworks?

Yes, we agree this could help the heat network sector by supporting consumer confidence, and provide a level playing field across actors.

Question 76: Please provide any other comments you may have on the policy proposals within the consultation.

CIBSE recommend the inclusion of overall energy and carbon performance requirements within HNTAS. Not having carbon performance requirements in place contradicts key stated principles and objectives:

- the intended focus on outcomes: currently, there is much emphasis on processes which are expected to produce improvements in performance, but less focus on the outcomes themselves. There is no guarantee, for example, for the consultation statement that *“new systems will be designed so that unnecessary carbon emissions are avoided from the outset”*.
- delivering carbon savings: without carbon requirements within HNTAS, there is no guarantee that carbon savings will be delivered, and to what extent.

CIBSE are concerned that the consultation does not even include an options assessment or justification for not introducing these.

We understand that carbon content of heat limits may be introduced a part of heat zones, but :

- these zones may not cover all networks, especially existing networks which will usually be the ones with the poorest performance.
- the latest information available on heat zoning requirements (January 2026 update <https://www.gov.uk/government/consultations/proposals-for-heat-network-zoning-2023/outcome/heat-network-zoning-consultation-2023-summary-of-government-response#:~:text=From%202030%2C%20all%20zone%20heat,network%20developers%20time%20to%20adapt>) states that *“Failure to comply with emission limits could see the removal of zone developers’ rights to further development in the heat network zone”*. This is far from adequate, as it is not a definite (“could”), and seems to imply that the only penalty would be to prevent further expansion i.e. high-carbon networks could continue operating as long as they do not expand. This must be addressed,

both through HNTAS and heat zoning conditions in order for heat networks to truly deliver carbon savings.

HNTAS is the most straightforward way to introduce carbon performance requirements, as part of the scheme's KPI, to align KPI with the scheme's stated objectives.