Real Estate:UK

GUIDANCE ADVICE

Energy Data Collection

for UK Real Estate



November 2026

Guidance Advice: Energy Data Collection for UK Real Estate

This guidance provides a practical framework for improving access to, and management of, energy data across UK real estate assets. Robust utility data is essential for credible carbon reporting, effective asset management, decarbonisation planning, and meeting regulatory, investor and lender expectations.

This guidance reflects the regulatory and market environment as of August 2026. Material changes to data access rules, metering requirements or industry codes may affect the mechanisms described. This guidance will be reviewed on a defined bi-annual cycle. Real Estate:UK (RE:UK) assumes no responsibility or liability for any errors or omissions in the content of this Guidance Advice.

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1. Introduction

Across the UK real estate sector, most large asset owners currently lack access to complete, whole-building utility data, particularly in multi-let buildings. This creates material gaps in benchmarking, net zero pathway modelling, investment decision-making and regulatory readiness. These challenges persist despite significant advances in digital platforms, data infrastructure and the increasing rollout of smart and advanced meters.

This guidance sets out to explain:

- why utility data matters **(Section 2)**;
- the scope of the guidance, including what is and is not covered **(Section 3)**;
- the practical routes available today to access energy data **(Section 4)**;
- the legal and consent frameworks governing access **(Section 4)**;
- recommended roles, responsibilities, processes and implementation steps for obtaining and managing utility data **(Section 5)**; and
- areas where policy, market, and regulatory change may be required to close the remaining utility data gap at scale **(section 6)**.

This guidance is intended for the following industry stakeholders:

- Landlords / Owners for strategic policy setting, lease positions and portfolio governance.
- Asset and Property Managers for day-to-day data acquisition, consent management, issue resolution and platform integration.
- Tenants / Occupiers for understanding data-sharing expectations, benefits and protections.
- Advisors and delivery partners for consultants, data aggregators, ESG platforms and legal counsel.
- Government and policymakers to improve understanding of practical barriers to non-domestic utility data access and inform policy development.

2. Why utility data matters

Operational performance and decarbonisation
Accurate energy data enables credible net zero pathways, identification of efficiency opportunities, prioritisation of retrofit investment and optimisation of building operations.

Carbon reporting and regulatory readiness
Asset-level consumption data underpins Scope 1 and 2 emissions reporting and increasing proportions of Scope 3 emissions under various mandatory and voluntary reporting frameworks such as TCFD, ISSB/UK SRS, SECR, PCAF, and investor disclosure regimes. Granularity at asset level is increasingly expected.

Cost, value and finance
Utility data supports tenant bill transparency, service charge accountability, asset valuation, transition risk assessment, green finance and grant applications. Evidence consistently shows that access to granular energy data is a precursor to meaningful energy use and emissions reductions and can lead to a reduction in energy bills.

Strategy and policy engagement
Portfolio-level datasets inform capital planning, social value initiatives and engagement with external stakeholders on grid constraints, retrofit incentives and future regulation.

3. Scope and definitions

3.1 Scope

In scope:

- Electricity and gas consumption data from **supplier-owned primary meters**
- Meter-level and aggregated data accessed via industry databases
- Landlord and tenant-supplied meters governed by supplier data frameworks

Out of scope:

- Sub-metering strategies and landlord-installed internal metering systems (refer to CIBSE TM39 update)
    - **Landlord-owned metering:** Although landlord-installed hardware and sub-metering strategies are outside the scope of this edition, landlords may consider owning, operating and managing metering systems where this would improve data coverage, quality and control. Any such approach should be assessed against the asset's metering configuration, operational responsibilities, costs and tenant arrangements, with detailed design and implementation guided by CIBSE TM39.
- District heating and cooling networks
- Non-utility fuels (e.g. LPG, fuel oil, biomass)
- Water and other environmental datasets (to be considered in future editions)

- Half-hourly residential and microbusiness consumption from smart meters (the framework is likely to change in or about May 2027 and be consulted upon in the next calendar quarter).[1]

Key definitions and acronyms are provided in **The Glossary**.

4. Energy (electricity and gas) utility guidance

This section outlines how electricity and gas consumption data can be accessed in practice. It explains the relevant data protection considerations, the decision-making process for selecting an appropriate access route, and the key requirements and limitations of both consented and aggregated data access.

Meters capable of sending automated readings significantly improve the quality and timeliness of energy data and reduce reliance on manual processes (although there can be installation and operating challenges, as highlighted in previous research by RE:UK.) However, in multi-let commercial buildings, meter installation alone does not create automatic landlord access to tenant consumption data. Access remains governed by consent rules, aggregation thresholds and practical constraints such as meter identification.

For this reason, energy data access is best understood through consented and non-consented (aggregated) routes rather than by landlord/tenant billing arrangements.

The energy market operates differently to other markets. Not all grounds under GDPR are recognised and the central databases treat all consumption data as if it is personal data, even if it is commercial and does not relate to a sole trader.

There are six lawful bases to process personal data under UK data protection law as follows:

1. consent;
2. contract;
3. legitimate interest;
4. public task;
5. legal obligation; and
6. vital interests.

Consent is often required for data that is deemed to be sensitive. Whilst energy consumption falls short of the Information Commissioner's Office (ICO)'s definition of special category data, half-hourly energy consumption could be processed to reveal a building's occupancy patterns, for example. It is for this reason that the energy market currently only recognises consent as a lawful basis to process energy consumption data at a meter level. This includes consumption aggregated to monthly or annual values, if it remains at an individual meter level.

Traditionally, the energy market recognised either the energy consumer or the bill payer as being capable of giving consent.

[1] Interested parties can follow updates and participate here: https://retailenergycode.co.uk/our-programmes/consumer-consent-solution/

Technically, this may still be the case with some industry data providers but broadly, the market is shifting to only recognise the consent of the energy consumer.[2] In practice, fundamental industry activities such as tenant recharging rely on bill payers having access to this data, and the energy consumers in these cases often have little or no contact with the supplier, therefore more guidance would be needed from the central data owners to explain how these changes would be practically implemented.

More recently, the energy market has recognised legitimate interest as a basis for processing consumption data for purposes such as carbon reporting in cases where there is no consent. But when this basis applies, consumption data must be aggregated to a minimum of five meters (per fuel) in order to protect the privacy of the energy consumers.

Although UK data protection law provides six lawful bases for processing personal data, the energy market currently recognises primarily consent and legitimate interest for utility data access. The flow chart therefore focuses on these two routes.

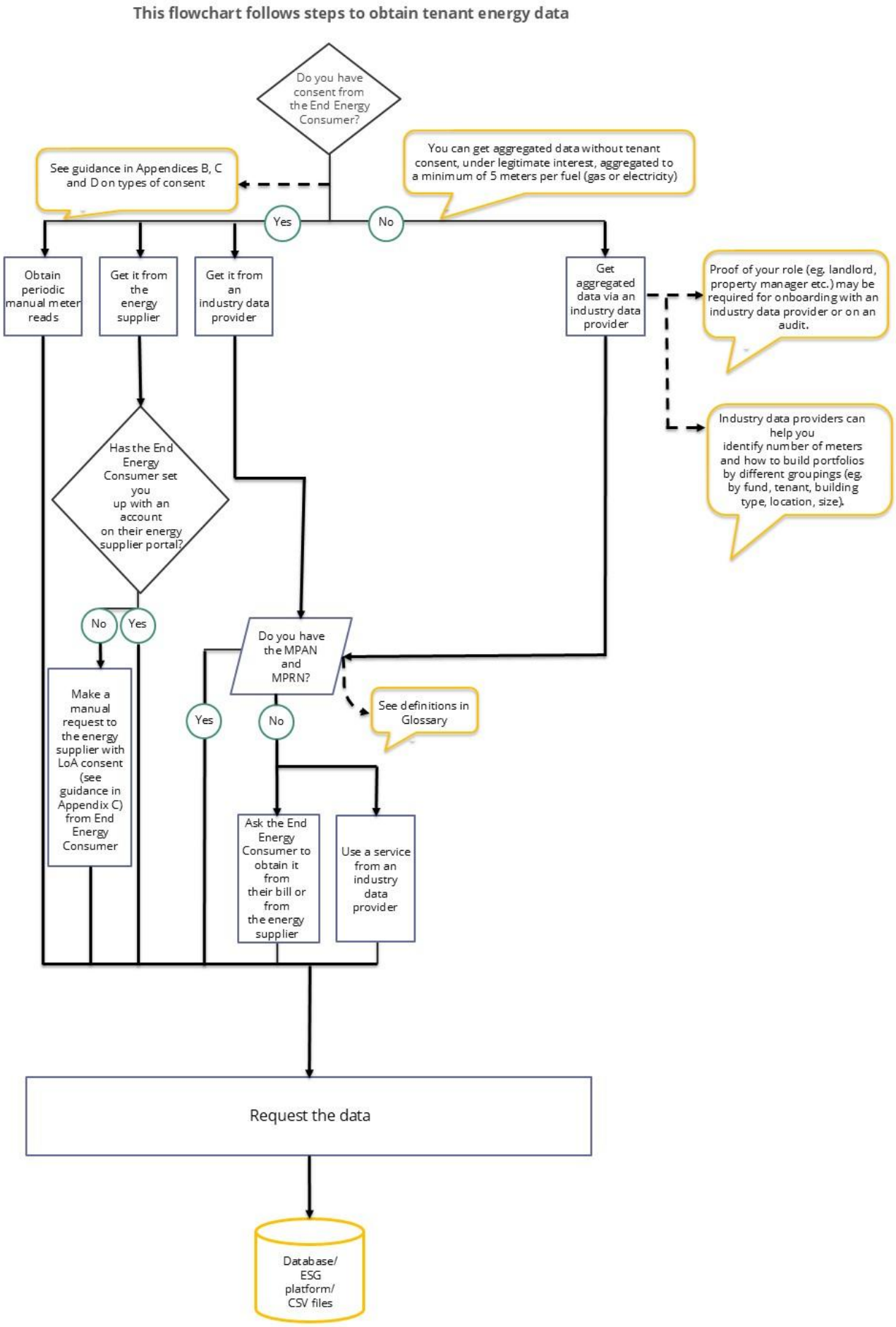
4.1. Decision pathway – overview

Figure 1 (RE:UK Energy Data Access Flow Chart) summarises the practical steps required to determine which data access routes are available for any given asset, including:

- whether valid consent from the End Energy Consumer exists;
- whether data can be accessed at meter level or only in aggregated form;
- what identifiers (MPAN/MPRN) are required; and
- which delivery routes are feasible.

This flow chart should be used as the starting point for asset-level decision-making. Please refer to Appendix A for the detailed process to be read in conjunction with the below flow diagram).

[2] The whole of market electricity data provider, ElectraLink, now only recognises the consent of the energy consumer (See section 5 of their Privacy Policy: https://www.electralink.co.uk/policies/privacy-notice-2/). RECCo, which provides access to whole of market gas data, legally still recognises both consumer and bill payer, but is planning to change to consumer only, at least in relation to residential half-hourly smart meter data. Its plans beyond that – for commercial gas consumption and consumption at less granular intervals are not yet published (but likely coming in 2027). Outside of the central whole of market providers, commercial entities (such as energy suppliers and DA/DCs), these tend to still recognise the rights of bill payers. But for entities relying on bill payer consent, this could be a risk to ongoing data access which may need management going forward (Our recommendations on this point are captured in Section 6).


This flowchart follows steps to obtain tenant energy data
Do you have consent from the End Energy Consumer?
See guidance in Appendices B, C and D on types of consent
You can get aggregated data without tenant consent, under legitimate interest, aggregated to a minimum of 5 meters per fuel (gas or electricity)
Yes
No
Obtain periodic manual meter reads
Get it from the energy supplier
Get it from an industry data provider
Get aggregated data via an industry data provider
Proof of your role (eg. landlord, property manager etc.) may be required for onboarding with an industry data provider or on an audit.
Industry data providers can help you identify number of meters and how to build portfolios by different groupings (eg. by fund, tenant, building type, location, size).
Has the End Energy Consumer set you up with an account on their energy supplier portal?
No
Yes
Make a manual request to the energy supplier with LoA consent (see guidance in Appendix C) from End Energy Consumer
Do you have the MPAN and MPRN?
See definitions in Glossary
Yes
No
Ask the End Energy Consumer to obtain it from their bill or from the energy supplier
Use a service from an industry data provider
Request the data
Database/ ESG platform/ CSV files

4.2 Consented meter-level data

Definition
Meter-level energy consumption data accessed with valid consent from the End Energy Consumer (tenant or landlord where they are the consumer).

Mechanisms for access

- **Automated data feeds via industry databases** (preferred approach)
- **Manual provision of energy bills or supplier account access.** Where manual data collection is required, example tenant communications and data request templates are provided in Appendix D.
- **Manual meter reads** (typically a last resort)

Automated data feeds are preferred as they:

- require only one-off consent engagement (unless there is a change in tenancy or withdrawal of consent);
- provide the highest data quality (meter data);
- reduce ongoing administrative effort; and
- scale more effectively across portfolios.

Industry databases and data access

Electricity and gas consumption data is reconciled centrally:

- **Electricity:** Elexon
- **Gas:** Xoserve

Access for non-industry participants is currently via:

- **All Electricity:** ElectraLink (but shifting to Elexon). ElectraLink is a for profit entity owned by the electricity distribution companies. ElectraLink is not licenced, but its owners are. Data access is governed by a User Group, which has representatives from the energy industry. Elexon is not for profit, licenced by Ofgem and is governed by the Balancing and Settlement Code.
- **All Gas:** the **Retail Energy Code Company (RECCo)** (but potentially also available via Elexon in the future) – both being interfaces to the Xoserve database). RECCo is a not-for-profit entity licenced by Ofgem. It is governed by the Retail Energy Code.

Data may be accessed either:

- directly by contracting with RECCo/ElectraLink; or
- contracting with an entity who is already integrated with RECCo/ ElectraLink and is an authorised provider/ reseller.

Contracting direct

Both RECCo and ElectraLink recognise different user types and have a change request process to apply for new types to be recognised. However, these processes can be slow. With RECCo, the most relevant types to this paper include:

- third-party intermediaries (providing tariff comparison and switching services, such as moving to low carbon fuel sources);
- third-party intermediary service provider (if providing services to other intermediaries, rather than to the energy consumer direct);
- energy consultant (providing energy analysis/ advice and converting consumption into carbon data for net zero planning and reporting purposes);
- local authorities; and
- service provider (providing utility management services including change of occupier, void property management, debt clearance and restoration of assets).

ElectraLink does not have a public user type list, but in terms of relevance to this paper, its website does refer to working with:

- intermediaries; and
- consultants.

Whilst these have traditionally been defined as brokers, price comparison websites and energy consultants, they can also support landlords, property managers, asset managers, social housing providers and local authorities.

Both have onboarding requirements, including those relating to data protection and security policies and processes.

More information on how to become a direct customer can be found here: RECCo re gas data: https://www.xoserve.com/products-services/data-products/gas-enquiry-service-ges/

https://www.electralink.co.uk/data-solutions/

While property owners can contract direct, in practice most choose to work through authorised providers, who help manage the associated complexity. Direct engagement remains an available option for those interested, but the authorised provider route is generally the most common and streamlined approach.

Contracting via an authorised provider

There are a number of industry data providers who provide integrated access across the various industry databases (including RECCo, ElectraLink and more) and manage the technical, regulatory and contractual complexity on behalf of intended audiences set out in section 2.2 above. This includes meeting all the individual provider requirements, maintaining continuity of service throughout industry changes, and providing different routes to access data (such as CSV file download, as well as API). Examples of providers include PERSE, arbnco and Deepki.

Consent requirements

There is not a public and official set of rules, other than following compliance with UK data protection law. This will change with RECCo's Consumer Consent Solution but will initially apply only to residential half-hourly consumption data.

Different providers may look for different aspects in a customer's privacy and security policies at onboarding.

However, generally, consent must be informed, specific and clear about:

- who is accessing the data,
- what data is accessed, and
- for what purposes.

Letters of Authority (LoAs) remain the most common mechanism. Green lease clauses are increasingly recognised as supporting evidence of consent but may not alone satisfy all data providers.

Processes vary slightly by provider. They may also vary for less granular data, such as annual estimated consumption, where price comparison websites have shown that an opt-in is not required. However, in the absence of an opt-in, there needs to be an affirmative action taken by the energy consumer to confirm consent (such as clicking to continue in the comparison website journey after being shown appropriate data consent text).

Practical challenges and mitigations

- **Meter identification:** MPANs (electricity) and MPRNs (gas) are essential. These are not displayed on meters and must be obtained from bills, suppliers, network operators or industry data providers.
- **Address matching:** Portfolio address records may require cleansing before they can be matched reliably. While some providers can retrieve MPANs and MPRNs using postcode and address data, these might not always be correctly matched with the right postcode; Postcode or address searches may omit meters or return multiple, similar properties, creating completeness, data privacy and accuracy risks if the wrong MPAN or MPRN is selected. Identifiers should therefore preferably be obtained from invoices and be confirmed with the occupier or against a verified asset meter map, where available, rather than relying on address matching alone.
- **Meter mapping governance:** Treat meter mapping as an ongoing process rather than a one-off exercise. Establish a documented methodology, ownership and agreed review intervals across the reporting year so that maps remain current as occupiers, suppliers and metering configurations change.
- **Meter infrastructure:** Data quality and usability depend on the underlying meter infrastructure. Portfolios dominated by older, manually read or non-half-hourly meters are more exposed to estimates and subsequent corrections than those with half-hourly or smart meters. Stronger governance and auditability are therefore required, and the data may be suitable primarily for reporting rather than detailed strategy setting or project planning.
- **Supplier switching:** Data continuity issues may arise during switches; providers integrated with multiple data sources can mitigate gaps.

- **Settlement corrections and data quality:** Energy market settlement and adjustment processes can revise historical consumption months after meter reads are submitted. Providers should therefore maintain a clear data quality protocol that accommodates restatements and provides an auditable, transparent and traceable record of source data, validation, changes and corrections.
- **Methodology changes:** Switching collection methods, for example from invoices or manual reads to smart-meter data, may reveal previously uncaptured consumption and create an apparent year-on-year increase. Methodology changes should therefore be documented and their impact assessed when interpreting performance trends.

Risks and mitigation

Industry arrangements evolve. The only mechanism that fully guarantees unrestricted data access is becoming the energy consumer. Whilst landlords taking over as either bill payer or contracting party for the Data Aggregator (DA)/ Data Collector (DC) services can be recognised options today, ElectraLink require consent to be only from the energy consumer and RECCo may follow suit. These routes therefore carry risk, as well as financial and operational implications.

4.3 Non-consented aggregated data (legitimate interest)

Where tenant consent cannot be obtained, aggregated energy consumption data may be accessed under legitimate interest in carbon reporting and similar purposes.

Note that the aggregation approach described in this Guidance Note relates to non-domestic energy consumption data. Different requirements may apply to residential and microbusiness smart meter data under the Smart Energy Code and associated consumer consent frameworks.

Key characteristics of aggregated data

- Data is aggregated to protect confidentiality.
- Current market practice requires aggregation to a **minimum of five meters per fuel type**, though this threshold may change.
- Access is typically available only via automated industry data feeds.

The concept of five meters being a suitable aggregation comes from the electricity distribution companies having Data Protection Impact Assessments approved by Ofgem to allow them to access aggregated smart meter consumption data in order to better manage the networks. Five was the most common grouping approach approved, that balanced privacy considerations (such as the risk of disaggregation back into meter level) with the benefits of the data being shared.

Requirements

There are no official nor published requirements to collect aggregated data but the framework that some approved providers work from includes:

- Evidence of a legitimate role and purpose (e.g. landlord, asset manager, property manager).

- Documentation demonstrating reporting obligations for the asset or portfolio.

Limitations and risks

- Aggregation thresholds may increase in future industry reforms.
- Meter-level operational insights are not available.
- MPAN/MPRN identification challenges remain relevant.

5. Implementation guidance for tenant data access

This section provides practical implementation guidance for stakeholders (mainly landlords) seeking to access and manage tenant utility data. It outlines a recommended operating process, together with the key roles and responsibilities required to support effective, compliant and consistent data collection, management and reporting.

5.1 Standard operating procedure

1. **Asset onboarding:** Inventory meters; capture MPANs/MPRNs; verify address records.
2. **Legal enablement:** Implement green lease clauses (see Appendix B for a green lease clause example) and execute LoAs where required.
3. **Technical setup:** Integrate data platforms and establish automated retrieval.
4. **Tenant engagement:** Issue mandates for smaller assets where direct consent is required (see Appendix C for mandate examples). Where automated data access is not feasible, manual data requests may be used (see Appendix D for examples of manual data request templates).
5. **Changes of tenancy:** Maintain a robust handover process so authorised providers are notified promptly, existing access is stopped where required, and data collection for an incoming tenant begins only once the appropriate consent or other access basis is in place.
6. **Quality assurance:** Validate data; review anomalies and exceptions monthly.
7. **Reporting and action:** Treat data acquisition as the first step in a wider transition: use it to improve understanding of data quality, inform net zero pathways and capex planning, prioritise meter upgrades and support occupier engagement.
8. **Continuous improvement:** Audit data coverage and platform performance quarterly.

5.2 Roles and responsibilities

- **Owner / Asset Manager:** Policy setting, escalation and governance.
- **Property Manager:** Operational data collection and issue resolution.
- **Sustainability team:** Methodology, reporting, analysis and targets.
- **Legal:** Lease drafting, consent frameworks and risk management.
- **Tenants:** Provision of identifiers and cooperation under agreed mechanisms.

6. Industry aspirations and future direction

While this guidance sets out practical steps that landlords, asset managers, property managers and occupiers can take within the current framework, RE:UK recognises that voluntary arrangements alone are unlikely to deliver consistent and comprehensive access to non-domestic energy consumption data.

The industry's longer-term aspiration is for a clear, proportionate and stable framework that:

- distinguishes appropriately between personal and non-personal consumption data;
- enables privacy-protected access to sufficiently granular whole-building data;
- reflects the different confidentiality and privacy considerations associated with different levels of data granularity and use;
- provides greater certainty for building owners, occupiers and their authorised representatives; and
- clarifies the roles & responsibilities of the various organisations involved in managing the central utility databases.

Improved access to reliable consumption data would help support better building management, more targeted investment, credible reporting and the transition to net zero. RE:UK therefore intends to build on this practical guidance through wider engagement with Government, regulators, utility providers and other stakeholders on the policy and regulatory changes required to address the remaining barriers at scale.

Glossary

Aggregation: Combining data from multiple meters to protect individual privacy while enabling portfolio-level analysis. Under current legitimate interest rules, typically requires a minimum of five meters per fuel type.

Automated Meter Reading (AMR): A device that automatically collects consumption data (electricity, gas, or water) and transmits it to the supplier, eliminating the need for manual meter readings.

Bill Payer: The party financially responsible for paying energy bills, which may differ from the End Energy Consumer.

Confidentiality (Law of): Legal obligation protecting commercially sensitive information, such as business energy consumption data, from unauthorised disclosure. The energy industry treats all commercial consumption data as confidential.

Consent (Data Protection): Explicit permission from an energy consumer allowing their utility data to be accessed and used for specified purposes such as carbon reporting. Must be freely given, specific, informed, and unambiguous.

Data Aggregator/Data Collector (DA/DC): Entities either contracted by the energy supplier, energy consumer or bill payer to ensure that meter data flows into the settlement process. They can provide another direct route to energy data. Examples include Stark, SMS, Energy Assets, Siemens, IMServ and TMA Data Management.

Data Communications Company (DCC): The organisation responsible for managing the national smart metering communication infrastructure in Great Britain, providing the only market route for accessing half-hourly consumption data from residential and microbusiness smart meters.

Data Controller: An organisation that determines the purposes and means of processing personal data. In utility data access, both the entity requesting data and data providers may act as controllers.

Data Processor: An organisation that processes personal data on behalf of a data controller. Many utility data platforms act as processors for landlords and property managers.

Designated Premises: In electricity markets, premises with advanced or smart meters recording half-hourly consumption, typically larger commercial sites.

ElectraLink: Operates the Data Transfer Network (DTN), with near 100% market coverage of electricity data until MHHS completes, with the data then principally residing with Elexon.

Elexon: Settles all electricity consumption in Britain and is being tasked by Ofgem and DESNZ to make electricity and gas consumption data available in the near future.

End Energy Consumer: The individual or organisation that actually uses or consumes the energy at a property, regardless of who pays the bills. ElectraLink requires consent for data access from the End Energy Consumer. There is a risk that RECCo may follow suit.

General Data Protection Regulation (GDPR): UK/EU data protection law governing how personal data must be collected, used and protected. Applies to utility consumption data when it relates to identifiable individuals (e.g., residential properties or sole traders).

Granular Data: Detailed, time-specific consumption readings (e.g., half-hourly or hourly) rather than aggregated monthly or annual totals. Essential for identifying energy efficiency opportunities, optimising building operations and hourly carbon accounting.

Green Lease: A lease agreement containing provisions promoting environmental sustainability, often including clauses requiring tenants to share utility data with landlords or permitting landlord installation of meters and monitoring equipment.

Half-Hourly Data: Energy consumption readings taken and recorded every 30 minutes, providing detailed insight into usage patterns throughout the day. Required for accurate carbon reporting and identifying energy efficiency opportunities. A Meter Point Reference Number (MPAN) starting with 00 indicates a half-hourly (HH) metered supply.

Legitimate Interest: A lawful basis under data protection regulation allowing organisations to process personal data without explicit consent when they have a genuine, justified need (e.g., carbon reporting obligations) and the processing does not override individuals' privacy rights. Now recognised by the energy industry for certain entities with carbon reporting obligations, typically requiring aggregation to a minimum of five meters.

Letter of Authority (LoA): A legal document authorising a third party (such as a data provider or consultant) to request and access utility data from suppliers on behalf of a property owner, manager or tenant. Must specify authorised tasks, duration of authority, signature and date.

Market Wide Half Hourly Settlement (MHHS): An industry transition process requiring all electricity meters to settle on half-hourly data, shifting whole-of-market electricity data management from ElectraLink to Elexon/RECCo over 8-24 months.

Meter Point Administration Number (MPAN): A unique 13-digit reference number (sometimes called an "S number" or "Supply Number") that identifies a specific electricity supply point to a UK property. Essential for accessing electricity consumption data.

Meter Point Reference Number (MPRN): A unique 6- to 10-digit reference number (sometimes called an "M number") that identifies a specific gas supply point to a UK property. Essential for accessing gas consumption data.

Non-Domestic Premises: Commercial, industrial or other non-residential properties. Subject to different data access rules and meter rollout policies than residential properties.

Non-Half-Hourly Data: Energy consumption aggregated over longer periods (typically monthly or annually), often based on meter readings or estimates rather than automated granular collection.

Office of Gas and Electricity Markets (Ofgem): The UK energy regulator overseeing suppliers, network operators and data access frameworks. Formally approved Data Protection Impact Assessments enabling legitimate interest-based data access.

Opt-In Consent: A consent mechanism requiring the consumer to take an explicit affirmative action (such as ticking a box or signing a document) to grant permission for data access. Required by default for half-hourly consumption data.

Opt-Out Consent: A consent mechanism where permission is assumed unless the consumer actively objects. Permitted for non-half-hourly aggregated data only and must include clear explanation, unambiguous choice and affirmative action confirming acceptance (e.g., proceeding to use a service).

Personal Data: Information relating to an identifiable individual. The energy industry currently treats all utility consumption data as personal data, even for commercial properties, due to inability to systematically exclude sole traders.

Primary Meter: The main meter measuring total energy delivered to a property from the grid or supplier. This guidance focuses on primary meters only, not secondary sub-meters installed within properties.

Retail Energy Code Company (RECCo): The code manager for Great Britain's retail energy market. Currently the industry source for whole-of-market gas data. Customers can access data directly from RECCo or through authorised providers.

Smart Energy Code (SEC): The regulatory framework governing smart metering in Great Britain, including specific requirements for consumer consent and identity verification when accessing half-hourly smart meter data for residential and microbusiness properties.

Smart Meter: An advanced digital meter that automatically records electricity and/or gas consumption at least every half hour and transmits readings directly to suppliers. In the UK, SMETS2 is the current standard.

Sub-meter: A secondary meter installed downstream of the primary meter to measure consumption by specific areas, tenants or equipment within a building. Not covered by this guidance.

Third-Party Intermediary (TPI): Traditionally energy brokers but now expanded to include consultants and software providers who assist energy consumers or related parties (landlords, property managers) in obtaining and managing utility data.

Appendices

Appendix A: Flow chart; Summary and Step-by-Step Guidance

This appendix should be read in conjunction with the flow chart in Section 4.1.

A1 Summary of Process

The RE:UK Energy Data Access Flow Chart provides a practical decision pathway for determining how electricity and gas consumption data can be accessed for UK real estate assets within the current regulatory and industry framework. It is intended to support landlords, asset managers and property managers, particularly in multi-let buildings where access to tenant energy data is commonly constrained.

The process begins by establishing whether valid consent from the End Energy Consumer is in place. The existence and form of consent is the key determinant of both the level of data that can be accessed and the routes available. Where consent exists, the flow chart directs users towards meter-level data access, which represents best practice for carbon reporting, performance analysis and decarbonisation planning.

Where consented access is available, the flow chart requires confirmation of the availability of meter identifiers, namely electricity Meter Point Administration Numbers (MPANs) and gas Meter Point Reference Numbers (MPRNs). These identifiers are essential for accessing data through industry databases and are typically obtained from energy bills, suppliers, network operators or industry data providers rather than from the physical meter itself. Once identifiers are confirmed, data can generally be accessed via automated industry data feeds, either directly or through authorised industry data providers, providing higher data quality, reduced administrative burden and improved scalability across portfolios.

Where valid tenant consent cannot be obtained, the flow chart directs users to assess whether aggregated, non-consented data may be accessed under a legitimate interest basis. This route is primarily intended to support carbon reporting and similar obligations where individual tenant data cannot be shared. Under current market practice, aggregated data is typically required to be collected across a minimum of five meters per fuel type in order to protect confidentiality. While this route does not provide meter-level operational insight, it may still support portfolio-level reporting and disclosure requirements.

At each stage and across all routes, the flow chart prompts consideration of practical constraints and risks, including challenges associated with meter identification, address matching between portfolio records and industry databases, and data discontinuities arising from supplier switching or settlement corrections. These factors may affect the feasibility and reliability of particular data access routes and should be considered alongside theoretical availability.

The flow chart is intended to be used as a starting point for asset-level decision-making, rather than a one-off assessment. Outputs should inform wider implementation processes, including tenant engagement strategies, legal enablement through green lease clauses or LoA, technical platform integration and ongoing data quality assurance. Where neither consented nor aggregated routes provide sufficient coverage, the guidance recognises that alternative commercial arrangements, such as becoming the energy bill payer or appointing the DA/DC, may be considered, subject to their associated financial and operational implications. However,

please note that there is a risk that energy bill consent may not be recognised by some of the key central industry data sources, unless the bill payer is also the consumer.

Overall, the flow chart provides a structured and repeatable framework to navigate a complex and evolving energy data access landscape, supporting consistent, auditable decision-making aligned with current regulatory and industry requirements.

A2 How to Use the Data Access Flow Chart

Step 1. Assess each asset individually

Apply the flow chart on an asset-by-asset basis. This is particularly important for multi-let buildings, where access to tenant energy data may differ between occupiers.

Step 2. Check whether End Energy Consumer consent exists

Determine whether valid consent is in place from the End Energy Consumer (typically the tenant, or the landlord where they are the energy consumer).

This is the key decision point:

- Consent available → Follow the meter-level data route.
- No consent available → Assess eligibility for aggregated data access.

Step 3. If consent exists, access meter-level data

Meter-level data is the preferred option for carbon reporting, performance monitoring and decarbonisation planning.

Confirm meter identifiers

- Electricity: MPAN (Meter Point Administration Number)
- Gas: MPRN (Meter Point Reference Number)

These identifiers are normally obtained from bills, suppliers, network operators or specialist data providers.

Select a data access route

Data can typically be obtained through:

- Automated industry data feeds; or
- Authorised third-party data providers.

Where available, automated routes are generally preferred due to their scalability and data quality.

Step 4. If consent does not exist, assess aggregated data access

Aggregated data may be available under a legitimate interest basis.

Typically:

- Data must be aggregated across at least five meters per fuel type.
- The data supports portfolio-level reporting and disclosure requirements.
- It does not provide the operational insight available from meter-level data.

Step 5. Check practical constraints

Regardless of the route selected, consider factors that may affect data availability:

- Missing or invalid MPANs/MPRNs.
- Address mismatches between internal records and industry databases.
- Data gaps due to supplier changes.
- Historical data revisions following settlement corrections.

Step 6. Determine next actions

Based on the outcome, consider:

- Tenant engagement and consent processes.
- Green lease provisions and Letters of Authority (LoAs).
- Technical platform integration.
- Data quality assurance and ongoing reporting.

Where data coverage remains insufficient, alternative commercial arrangements may be required, such as becoming the energy bill payer or appointing the DA/DC.

Step 7. Repeat the process periodically

Review the assessment regularly as tenant arrangements, metering configurations, suppliers and regulatory requirements change. The flow chart is intended to be used as an ongoing decision tool rather than a one-off exercise.

Appendix B: Green lease clause (data sharing)[3]

The Tenant shall share with the Landlord and with any managing agents or professional advisors appointed by the Landlord the Environmental Performance data it holds for the ***[Premises],*** *including but not limited to information on the Tenant's energy and water use and waste production and recycling and any information automatically disclosed to the Landlord via any "smart" meter technology, data loggers or other similar technology at the* ***[Premises]*** *or in use at the* ***[Centre] [Building] [Parade] [other]*** *and the Landlord shall keep and ensure their agents or advisors keep that data confidential except they are entitled to use that data for any of the following:*

(a) monitoring and Improving the Environmental Performance of the ***[Premises]*** *or the* ***[Centre] [Building] [Parade] [Other];***

(b) measuring the Environmental Performance of the ***[Premises]*** *or the* ***[Centre] [Building] [Parade] [Other]*** *against any agreed or other targets****;***

(c) any reporting required by any Act or regulation or voluntary certification or rating scheme affecting the ***[Premises]*** *or the* ***[Centre] [Building][Parade] [Other]*** *or required by any finance arrangements; or*

(d) by way of disclosure to any legal, financial or other professional advisors/investors required by the Landlord (acting reasonably) where reasonably practicable such data shall be anonymised.

3 This clause broadly aligns with the data sharing clause in the Better Buildings Partnership (BBP) Green Lease Toolkit (GLTK) although the latter has additional operationally useful provisions (Data Sharing | Better Buildings Partnership). The GLTK data sharing clause adds the following: a) is mutual, b) deals with frequency of data sharing and c) includes tenant consent to the landlord seeking info directly from the supplier and requires a letter of authority from the tenant if the supplier requires one. Green lease provisions can vary considerably in scope and ambition, and there is no prescribed set of clauses that must be included. The present clause in Appendix B is focused primarily on data sharing and reporting. A more comprehensive green lease may also incorporate provisions relating to landlord and tenant collaboration, sustainability governance, operational performance standards, energy and environmental efficiency, fit-out and refurbishment requirements, waste management, metering and monitoring, renewable energy, and the implementation of sustainability improvements, including mechanisms for sharing associated costs and benefits. For examples of industry best practice, please refer to the Better Buildings Partnership (BBP) Green Lease Toolkit and its set of 'Green Lease Essentials' (GREEN LEASE ESSENTIALS | Better Buildings Partnership).

Appendix C: Tenant mandate / Letter of Authority template

LETTER OF MANDATE – EXAMPLE 1[4]

Dear Sir or Madam,

Our Company ***__[tenant to insert their company name]***_____ (*identified in Appendix 2 of this letter of mandate,* hereinafter referred to as the "**Tenant**"), having entered into a lease of the premises *identified in Appendix 2 of this letter of mandate* which is part of a fund or portfolio managed or advised by *[insert Investment Manager's name]* (hereinafter referred to as the "**Client**") or any of its group companies authorises *[insert data platform's name]* (a *[insert nationality]* company registered under the trade and companies register (SIREN) number *[XXX], identified in Appendix 2 of this letter of mandate,* hereinafter referred to as the "**Third Party**") to request and collect, where available, the following energy data:

- All information required to conduct analyses that pertains to the Client's real estate portfolio; and
- All documents containing such information (consumption, power demand, load curves, etc.).

With this letter of mandate, I, the Tenant, herein agree to provide:

- The Meter Point Administration Numbers (MPAN) for all electricity supplies serving our tenanted space at this premises
- The Meter Point Reference Numbers (MPRN) for all gas supplies serving our tenanted space this premises
- OR a copy of a recent energy bill for each energy contract at the property showing the MPRNs and MPANs

Please provide this information using the tables on page 2.

A non-exhaustive list of the data that may be requested is attached in Appendix 1. We remind you, however, that you are free to refuse to disclose certain information that you consider too confidential.

I hereby confirm that I:

- Am authorised to respond directly to the Third Party's requests; and
- Will send my answers to any request from the Third Party to the contact details indicated in Appendix 2.

This authorisation is valid for a period of one (1) year from the date of signature and shall automatically renew on each anniversary of the date of signature for further periods of one (1)

4 The first example of the Letter of Authority requests that the tenant completes the MPAN and MPRN details directly within the mandate. There are several acceptable formats for Letters of Authority; accordingly, a second example has been provided below for illustrative purposes: 'Letter of Mandate - Example 2'.

year, for a maximum of twelve (12) occurrences. Further termination provisions can be found in Appendix 2.

The Third party is allowed to request and collect utility data from *[insert date]*, which includes all the historic data available from that date.

This mandate is valid for the rental properties listed in the 'Information Request' section of this letter of mandate.

For any information on the confidentiality policy of the Third Party or to exercise the right of access or the right to rectification, please see the contact details of the Third Party in Appendix 3.

For all legal intents and purposes,

On behalf of the Tenant (tenant to fill out):

First and Last Name:	
Title:	
Company Name:	
Date of Authorisation:	

Signature:

INFORMATION REQUEST

Contact Details of the Tenant (to be filled out by the tenant)

- **Company Name:**_____
- **Address:**_____
- **Represented by:**
  - **Name:**_____

- **Title:**_____
- **Telephone:**_____
- **Email:**_____

Addresses of the property/properties the Tenant rents which are part of a fund or portfolio managed or advised by the Client:

Meter Details Request

Electricity

Address (including unit number if applicable)	MPAN

*Please insert additional rows if required

An **MPAN (Meter Point Administration Number)** is an **electricity meter** identifier in the UK.

Format :

- **21 digits** (full format): S XX XXX XXXX XXXX XXX
- **13 digits** (short format, most commonly used)

Examples :

- Full : S 12 345 6789 0123 456
- Short : 1234567890123

Where to find it :

- Electricity bill

- Listed as "Supply Number" or "S Number"

The **13-digit version** is what's typically requested by energy suppliers, but the full 21-digit format exists and contains additional technical information about the distribution network.

Gas

Address (including unit number if applicable)	MPRN

*Please insert addition rows if required

An MPRN (Meter Point Reference Number) is the gas meter identifier in the UK.
Format : 6-10 digits (typically 10)
Example : 1234567890

Where to find it:

- Gas bill
- Listed as "M Number" or "Gas Supply Number"

APPENDIX 1 (TO APPENDIX C): EXAMPLES OF DATA THAT MAY BE REQUESTED

- Available consumption history, by hourly or half-hourly intervals, over a period of 36 months
- Available history of consumption, power demand and monthly power overruns, by hourly or half-hourly intervals, over a period of 36 months
- Available history of daily indexes, by hourly intervals, and maximum daily power over the desired period, up to 36 months
- Available history of load curve over the desired period, up to 36 months
- Available technical and contractual data (to the distribution system operator and/or the service or energy provider) (e.g. connection specifications, metering device and contractual information (such as power demand), etc.);
- Remote meter reading details:
    - Meter reference number (identification reference/code/id)
    - Customer code or load curve code (key)
    - Timeframe for remote meter reading, if available
    - Switchboard extension number
    - Etc.
- etc.

APPENDIX 2 (TO APPENDIX C): TERMINATION PROVISIONS

Subject to the following termination provisions, this authorisation is valid for a period of one (1) year from the date of signature and shall automatically renew on each anniversary of the date of signature for further periods of one (1) year, for a maximum of twelve (12) occurrences

This mandate shall automatically terminate upon

- the end of the Tenant's current lease(s);
- the effective departure of the Tenant from the leased premises; or
- the receipt by the Third Party of notice sent by the Tenant sent to the relevant email address listed in Appendix 2, 2) Contact Details of the Third Party, confirming that the letter of mandate is terminated with immediate effect.

If, during the term of the lease or any subsequent renewals, the Lessor transfers ownership of the premises leased by the Tenant to a third party of its choice, by any lawful means, the latter shall be transferred, on an equal basis with the lease binding the Tenant to its Lessor, the attached mandate. In this case, the new Lessor undertakes to communicate the information to the Tenant by registered mail, 15 days prior to the change.

APPENDIX 3 (TO APPENDIX C): CONTACT INFORMATION

Contact Details of the Third Party

- Type: Company
- Company Name: *[insert data platform provider's name]*
- Legal Form (SA, SARL, etc.):
- Trade Name:
- Identification Number (SIRET):
- Activity (NAF code):
- Registered Office Address:

- For any request for additional information on the privacy policy, to exercise the right of access or right to rectification, or to advise of termination of authorisation only: *[insert website link]*

PLEASE NOTE : The e-mail "*[insert website link]*" must only be used to exercise the right of access or right to rectification, or to advise of termination of authorisation for the data concerned. Other requests will not be considered by the Third Party.

If you have any questions about the mandate, its signature or the transmission of data, please contact the Client

LETTER OF MANDATE – EXAMPLE 2[5]

[To be filled by the tenant]

Company Name (if applicable)

Address

Contact Number

Email

Your Name

Job Title (if applicable)

To whom it may concern:

Please accept this letter as confirmation that we give [*customer name*] consent to:

- Obtain from relevant third parties, analyse, process and control the following data including (but not limited to):
    - Utility data: current and up to 3 years historical gas, electricity and water consumption (including meter reads), meter details, supplier details, and contracted capacity, where relevant;
    - Utility consumption at whatever granularity the meter operates in, including half hourly.

For any properties for which we are the energy consumer.

Do this for the purpose(s) of *(please cross out what does not apply or what is not consented to)*:

- Utility procurement;
- Carbon reporting;
- Identifying measures to reduce carbon or utility costs, or a combination of both;
- Net zero strategies;
- Flexibility and/ or virtual trading;
- Advising and/ or assisting us in relation to our utility requirements generally; and/ or
- To create benchmarks/ industry insights.

I/ we acknowledge that [*customer name*] may work with third party data controllers and data processors and that those are listed here and may be amended from time to time: *[ADD LINK]*

I/ we confirm that the undersigned is authorised to sign this.

5 This second example of a Letter of Mandate captures the MPAN and MPRN separately from the mandate itself, using a technology-enabled solution provided by some industry data providers to make the data-sharing process as simple and efficient as possible for tenants.

This permission will remain valid unless withdrawn by written notification to *[customer email].*

Signed date

Signature

Appendix D: Manual data request templates

A) Tenant data request – Email template

Dear [Tenant Name],

Introduction and purpose of this request

As part of our ongoing management of the building and in line with applicable sustainability standards and environmental reporting requirements, *[***insert Investment Manager's name***]*, as landlord, together with its appointed sustainability data partner *[insert name]*, is requesting your cooperation in providing utility-related data (electricity and gas) associated with the private meters serving your premises.

This request forms part of our broader asset-level and portfolio-level sustainability management and reporting, including energy and emissions performance.

Information requested and how to provide it

To facilitate this process, we offer two options for providing the required data. You may choose whichever is most convenient for your organisation.

Option A – Manual submission

Provide the information by completing the enclosed Utility Information Template (Excel)[6], including:

- Meter reference numbers
- Utility type(s) (electricity, gas)
- Consumption data and units

Option B – Automated data access (electricity and gas)

Authorise *[insert data platform name]* to collect electricity and gas consumption data automatically from the relevant utility operators by completing the enclosed Tenant Mandate Form.

If you choose this option, please:

- Complete and sign the Tenant Mandate Form[7]; and
- Provide your MPAN (electricity) and/or MPRN (gas), where applicable.

Further details on the automated data collection process are included in the accompanying information flyer.

Data Protection and Privacy

Where any information provided relates to an identifiable individual, it will be processed in accordance with applicable data protection laws and the privacy notices of *[insert name of Investment Manager]* and *[insert name of data platform provider]*.

[6] Refer to sub section B) below – *B) Tenant data collection template*
[7] Refer to appendix C above

Personal data may be processed on the basis of its legitimate interests, including for building management, sustainability analysis and environmental reporting.

Further information on data protection rights, including the right to object to processing, is available in:

- *[insert name of Investment Manager]*'s privacy notice: *[insert privacy notice website],*
- *[data platform provider]*'s privacy notice: *[insert privacy notice website]*

Data retention

Utility and related sustainability data will be retained only for as long as is necessary to fulfil the purposes for which it is collected including building sustainability management, sustainability analysis and applicable regulatory or investor reporting only to the extent required by applicable law. Retention periods may vary depending on the nature of the data, the relevant jurisdiction and evolving legal, regulatory and reporting requirements. Data will be subject to periodic review and securely deleted or anonymised when no longer required.

Thank you for your cooperation.

Kind regards,

[Insert Asset Manager's name]

B) Tenant data collection template (to insert in the email body or in an excel file as attachment to the email in sub-section A) of appendix D)

Building Name	Meter Reference Number	Utility	Consumption start date	Consumption end date	Is the energy procured from renewable sources? (Yes / No)	Consumption (amount)	Unit (kWh)
		Electricity	01/01/2025	31/12/2025			
		Gas	01/01/2025	31/12/2025			
		District Heating	01/01/2025	31/12/2025			
		District Cooling	01/01/2025	31/12/2025			
			01/01/2025	31/12/2025			
			01/01/2025	31/12/2025			
			01/01/2025	31/12/2025			



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