

# District Heating in the Netherlands

How to go from a  
standstill to investable  
infrastructure

## Contents

- 01 Executive summary
- 02 Introduction to the Dutch Heating Market
- 03 Overview of the *Wet collectieve warmte*
- 04 Market response to the *Wet collectieve warmte*
- 05 Financing needed to realise the Dutch district heating ambitions
- 06 Implications of the *Wet collectieve warmte* on tariffs and operators
- 07 Our recommendations
- 08 Conclusion and how Eight Advisory can help



# Executive summary

## Executive summary (1/2)

**District heating in the Netherlands can move from standstill to investable if the right actions are taken soon.**

**In 2025, c. 6.7m of the 8.3m Dutch dwellings relied on a gas boiler, while c. 0.6m were on district heating<sup>1</sup>.**

Electric heating, mostly heat pumps, more than doubled its share, from 4.5% of dwellings in 2022 to 10.0% in 2025, and now heats more dwellings than district heating<sup>1,2</sup>. However, electrification adds to the pressure on an already congested power grid<sup>3</sup> and reinforcing that grid comes at a cost to society. District heating therefore remains an essential part of the ambition to move away from gas and to decarbonise heating and, in some areas, it could also be the lower-cost option.

**Investment in district heating has nevertheless stalled, and the Dutch Collective Heat Act (*Wet collectieve warmte, Wcw*) is a principal reason.**

The Wcw, expected to enter into force on 1 January 2027<sup>4,5,6</sup>, makes two structural changes. First, it requires that the local municipality designates one heat company for each defined area (“warmtekavel” or “system”) as the only party allowed to transport and supply heat within its system<sup>9</sup>. New designations can only go to a publicly controlled body or a heat community; existing operators keep their systems under a transitional designation of 14 to 30 years<sup>7,8</sup>. Second, it replaces the current gas-indexed tariff cap with cost-based revenue regulation phased in over three stages<sup>9</sup>. These changes set a direction, but the core valuation and return parameters remain unresolved. Key operators, Eneco and Vattenfall, are reviewing ownership, while Ennatuurlijk has stopped building new networks<sup>10,11,12,13</sup>. Only c. 12,500 net new connections were realised in 2024<sup>14</sup>, which is not enough to support the already lowered government ambitions of 200,000 new connections by 2030<sup>15,16</sup>. This target is getting out of sight.

**The sector is not earning its allowed returns. Therefore, consumers are likely to face higher bills due to the Wcw.**

Heat suppliers earned an average return of 3.9% on invested capital between 2013 and 2024, compared to a current ACM-allowed return of 7.3%<sup>17,18</sup>. A move from the current regulation to a cost-plus based method could significantly increase tariffs for consumers, although the impact may vary by system and depends on how ACM regulation plays out.



*Notes: i) small collective heat systems may be granted an exemption to operate without a designation, and as such without the public-majority requirement<sup>7</sup>. Refer to pages 11–12 for more details.*

## Executive summary (2/2)

**To reach 2.6m connections by 2050<sup>19</sup>, another c. €36.8bn of investment is required at today's price level<sup>20,21</sup>. The government (or taxpayers) could need to fund up to c. €20bn, if private capital does not participate in equity funding.** New investments are usually financed 30% by connection contributions, 20% by subsidies provided by the government and the remaining 50% between debt and equity in a 60:40 split. Without private equity being invested, we estimate that in total 40% of the €36.8bn will have to be financed by the government or taxpayers<sup>20,21</sup> (subsidies and equity investments). This roughly translates to €15bn. Another €2–5bn is estimated for the transfer of current assets to public entities<sup>22,23</sup>. In total, the public capital requirement could reach up to c. €20bn<sup>22</sup> for the government to fund.

**Not all is doom and gloom. We see plenty of activity in small collective heat systems** (up to 1,500 connected users), including the recent acquisitions of Eteck by Partners Group and Equans Energy Solutions by Essent (E.ON)<sup>24,25</sup>. Small collective heat systems can be granted an exemption from the designation requirement, and therefore without the public-majority rule, making them attractive for buy-and-build strategies.

**Our recommendations.** To get things moving, we advise that the regulator, government, sector and other stakeholders get to an agreement on the RAB methodology, long-term WACC (Weighted Average Cost of Capital) and a clear benchmarking framework sooner rather than later. Without these regulatory parameters being set, it will be practically difficult to agree on valuations for the transfer of assets from private investors to public related entities, unless compensation mechanisms are implemented. Greater regulatory clarity will be critical to enabling the transition and supporting further market development.

Even after the transfer, mobilising private capital will remain important to finance the expansion required, especially at a time of pressure on public finances and government debt. Private capital participation requires clear valuation frameworks, minority protections for private shareholders and clear transition paths, alongside the regulatory parameters discussed above.





# Introduction to the Dutch Heating Market

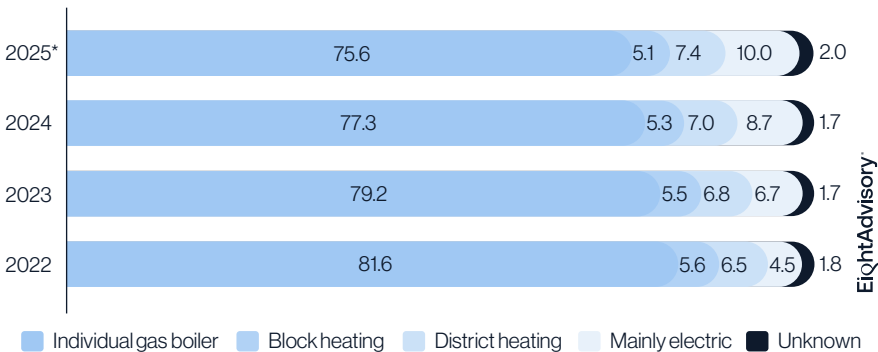
# Dutch dwellings are gradually shifting away from gas, while electrification accelerates

The Dutch heating sector comprises several different heating technologies, including both individual solutions for a single dwelling and collective solutions serving a larger building, a neighbourhood, or an entire town. This diversity makes the sector inherently difficult to regulate.

Table 1: Overview of the most common heating solutions on the Dutch market

| Heating solution       | How it works                                                                                                                                                                  |
|------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Individual gas boiler  | Boiler inside the dwelling; space heating and usually domestic hot water                                                                                                      |
| All-electric heat pump | Air-to-water or ground-source heat pump in the dwelling. The ground/water source may be the dwelling's own loop, or a shared low-temperature loop ( <i>collective ZL T</i> ). |
| Hybrid heat pump       | Electric heat pump alongside a gas boiler carrying peak load and domestic hot water                                                                                           |
| Block heating          | One collective installation serving a single building: either its own boiler, usually gas-fired, or a connection to an external heat network metered at the building          |
| District heating       | Hot water distributed to multiple buildings through insulated pipes; a delivery set in the dwelling replaces the boiler                                                       |

Figure 1: Dutch dwellings by main heating installations (%)



Categories reflect CBS's classification of the main heating installation. Mainly electric refers to a dwelling where electricity is identified as the primary heating source, including some dwellings that may also be connected to a heat network  
\*2025 provisional (CBS)

Source: CBS, Eight Advisory analysis

“Electrification of heat is not a long-term solution due to the already congested power grid. District heating is a cheaper and better alternative in most places.

Martijn van Heugten, Partner Eight Advisory

**Most Dutch dwellings still run on gas, and the ones leaving it are going electric.** The Dutch government has ambitious targets for the roll-out of district heating connections, but district heating's market share has grown by less than a percentage point since 2022<sup>1,2</sup>. Electrically heated dwellings, mostly with heat pumps, already outnumber those on district heating<sup>1,26</sup>.

**Electric heating is adding to a grid that is already full.** Every dwelling that switches from gas to electric uses more electricity all year, and much of the Dutch power grid is already at capacity<sup>3</sup>. On the coldest days, the effect is more severe: a dwelling with an all-electric heat pump adds about two-thirds more to simultaneous peak demand than a hybrid one<sup>27</sup>.

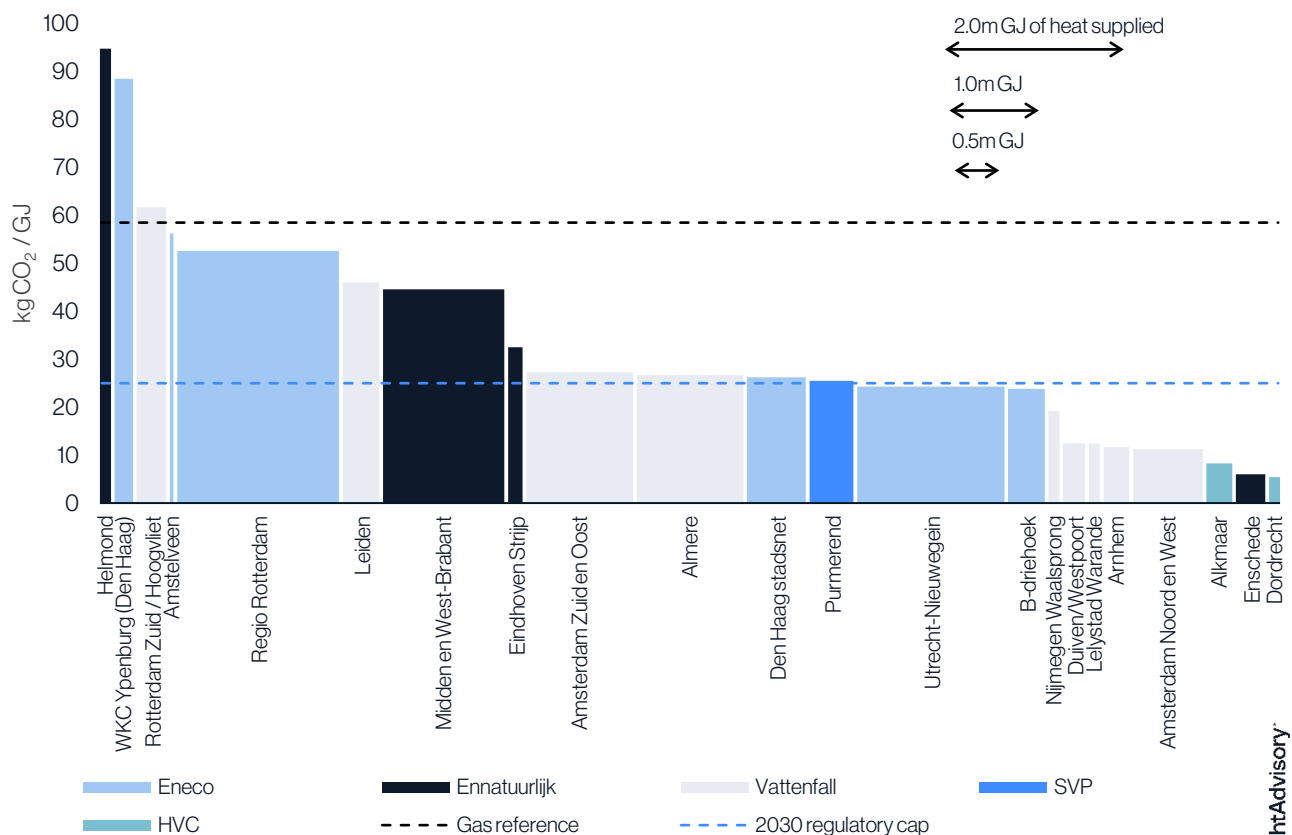
Eight Advisory is a member of

# District heating networks emit materially less CO<sub>2</sub> than the gas boilers they replace

**Beating a gas boiler is no longer the test.** Most district heating networks already emit less than 58.5 kg CO<sub>2</sub> per gigajoule, the Dutch benchmark for a home heated by its own gas boiler<sup>28</sup>. New regulation is due to take effect in January 2027, which caps each system at 25 kg CO<sub>2</sub> per gigajoule from 2030 onwards<sup>29</sup>. The cap then falls each year thereafter, in line with the national target of climate neutrality by 2050. A feasibility study commissioned by the government found the 2030 cap achievable for a large share of networks, although only if investment starts today<sup>30</sup>.

**Figure 2: Carbon intensity of the 22 largest Dutch heat networks, 2024 (kg CO<sub>2</sub> / GJ)**

These 22 networks supply 85% of all heat delivered by licensed Dutch heat suppliers



Source: RVO, Eight Advisory analysis

**The cleanest networks are the ones connected to heat that would otherwise be wasted.** Dordrecht, at 5.4 kg CO<sub>2</sub> / GJ, takes residual heat from a sewage sludge treatment plant, with Arnhem and Duiven both drawing on the same waste incinerator east of Arnhem<sup>31,32</sup>. **The weakest results come from networks that had to fall back on gas.** Rotterdam Zuid, at 61.7 kg CO<sub>2</sub> / GJ, lost its main heat source (a waste incinerator) in September 2023, and c. 70% of its heat continued to come from gas in 2024<sup>11,14</sup>. Helmond is the highest at 94.8 kg CO<sub>2</sub> / GJ, having reported all its 2024 heat as coming from gas-fired boilers rather than its combined heat and power plant. Ennatuurlijk is now modernising that plant, with work close to its scheduled completion. It has also tested iron fuel and is in talks with a compost producer, but a full switch away from gas is still some way off<sup>14,33,34</sup>.

Gas boilers have high emissions, and the grid has limited room to electrify. The opportunity for district heating sits in dense areas with low grid capacity for heat pumps, and a clean heat source.

# Power grid congestion is already a reality, and going all-electric is likely to cost the country more

**As noted on the previous pages, additional heat pumps would add load to an already congested power grid. That congestion isn't a future risk, it's happening today.** TenneT's national waiting list for withdrawal capacity stood at 38 GW across 212 parties as of late 2025<sup>35</sup>. In December 2024, a large part of TenneT's high-voltage grid in Zuid-Holland reached maximum capacity for large grid users, while the regional grids of Stedin and Liander had already been congested for some time before that<sup>36</sup>.

## Case study – Den Haag City

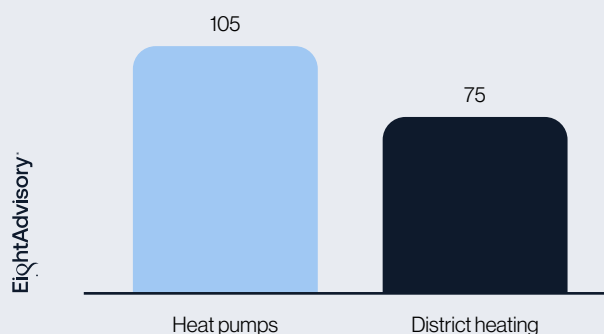
A 2024 Berenschot study for the municipality of Den Haag, cited in the Algemene Rekenkamer's 2025 audit, compared the national additional cost of a heat network with all-electric heat pumps for the dwellings in the city's heat-network plan area.

The all-electric heat pump option was estimated to cost approximately €105m, of which a large part relates to the additional power-grid reinforcement required. An equivalent heat network was estimated to cost approximately €75m, almost 30% less<sup>37</sup>.

One city doesn't prove the case for the entire country. However, it does show that district heating is the cheaper option for at least part of the Dutch building stock and puts a concrete number on what we already flagged. Delay doesn't just cost the heating sector; it can bring additional costs to the country.

### Figure 3: National cost of Den Haag's heating options (€m)

*National-cost accounting, single-municipality case.*



Source: Berenschot, Eight Advisory analysis





# Overview of the *Wet collectieve warmte*

## The *Wet collectieve warmte* makes two structural changes to the Dutch district heating market (1/2)

**Who is allowed to supply heat.** A designated heat company is the only party allowed to transport and supply heat within its system. New designations can only go to a company more than 50% owned by a public body (central government, a province, a municipality or another public body), a heat joint venture controlled by a public-majority network company, or a heat community<sup>7,8</sup>. Existing operators receive a transitional designation for the system they serve today, lasting 14 to 30 years. Within that period there is a 10-year window in which they may sell a majority stake to a private party. After that 10-year period, any transfer of decisive control must go to a public body or a heat community. There is an exemption possible for small collective heat systems<sup>7</sup> (see next page).

**How the price is set.** The Wcw phases out the Niet-Meer-Dan-Anders rule (NMDA — which indexed end-user heat prices to gas) over three phases, moving to cost-based revenue-cap regulation fully implemented in 2034 at the earliest<sup>9</sup>. Initially, ACM sets annual maximum tariffs using a corrected gas reference price, transitioning first to per-system cost-based price caps and ultimately to a full revenue cap per system. Any revenue earned above the allowed level is offset through lower tariffs in future periods<sup>38</sup>. Small collective heat systems will have a lighter tariff regime, details of which are not yet known<sup>7</sup>.

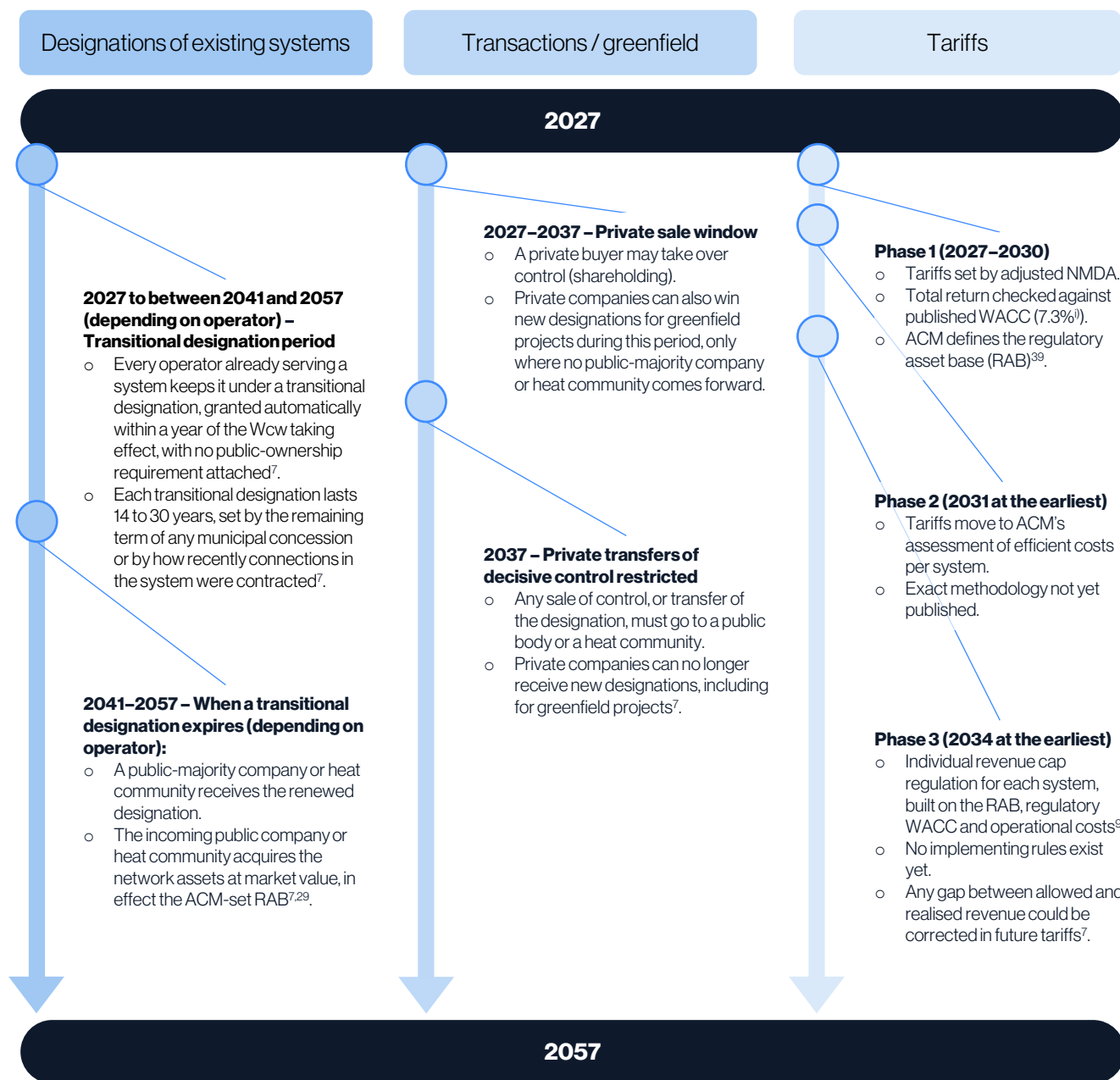
“*The Wcw will change how prices are set and who can operate networks. Whilst formally there is a long transition period, we expect transaction activity in the next years but pricing will not be easy on the basis of unset regulatory parameters.*”

Niels Lummen, Partner Eight Advisory



# The *Wet collectieve warmte* makes two structural changes to the Dutch district heating market (2/2)

Figure 4: The Dutch heat market's regulatory roadmap



Small collective heat systems (between 20 and 1,500 connected users) must register with the municipality within six months of the Wcw taking effect. They can be granted an exemption to operate without a designation, and as such without the public-majority requirement. There will also be a lighter regulatory regime on tariffs<sup>7</sup>.

Notes: i) Pre-tax WACC, 6.8% plus a conditional 0.5% surcharge for asymmetric risk, decided for 2026–2028<sup>18</sup>. Future rate uncertain.



# Market response to the *Wet collectieve warmte*

# The market response to the Wcw: halted investment and ownership reviews

**The uncertainty about future ownership rules and long-term returns has led all three major district heating operators to hold back on new networks.** Ennatuurlijk has stopped building new networks and Vattenfall has halted new large-scale projects in existing buildings, while Eneco says delays and uncertainty around the new heat law have stalled its investments in collective heat networks<sup>10,11,12,13</sup>. All three cite the Wcw as a key reason. Eneco and Vattenfall are also reviewing the ownership of their district heating businesses, with Eneco looking for a public buyer<sup>10,12</sup>.

As further explored on the next page, the halted investment is making it increasingly difficult to reach the Dutch national targets of new heat network connections.



Eneco's annual reports document a progressive withdrawal from heat network investment driven explicitly by the Wcw.

- In April 2024, the company paused its Overvecht-Noord project in Utrecht, citing "greater investment uncertainty in view of the possible introduction of the Wcw."<sup>41</sup>
- FY2024 annual report: "delays and uncertainty around the new heat law have stalled investments in collective heat networks."<sup>42</sup>
- FY2025 annual report: the CEO reported that heat operations "suffered from new legislation, which has decreased the pace of development of new connections and projects."<sup>43</sup>
- In October 2025, CEO Ron Wit told the Financieele Dagblad that Eneco was seeking a public-sector buyer for its entire district heating portfolio, naming the Wcw directly<sup>12</sup>: "the law prevents minority shareholders from having a say in key decisions. That's unacceptable and irresponsible for projects of this size and complexity."



Ennatuurlijk restructured its strategy around the Wcw before it takes effect. Its 2024 annual report confirmed the Wcw directly shaped the revision<sup>13</sup>.

- It stated that the Wcw "requires a different way of doing business" and "for now, due to the uncertainty about the Wcw, we are not laying new heat networks."
- €91.2m invested in 2024 in total, with a focus on decarbonising five large networks (Enschede, Eindhoven, Maastricht, Leeuwarden and Helmond). In 2025, total investment fell further to €70.9m, still directed at existing assets and required investments to replace the heat source<sup>40</sup>.
- Geothermal expansion projects in Moerdijk and Leeuwarden were also suspended, citing Wcw uncertainty.



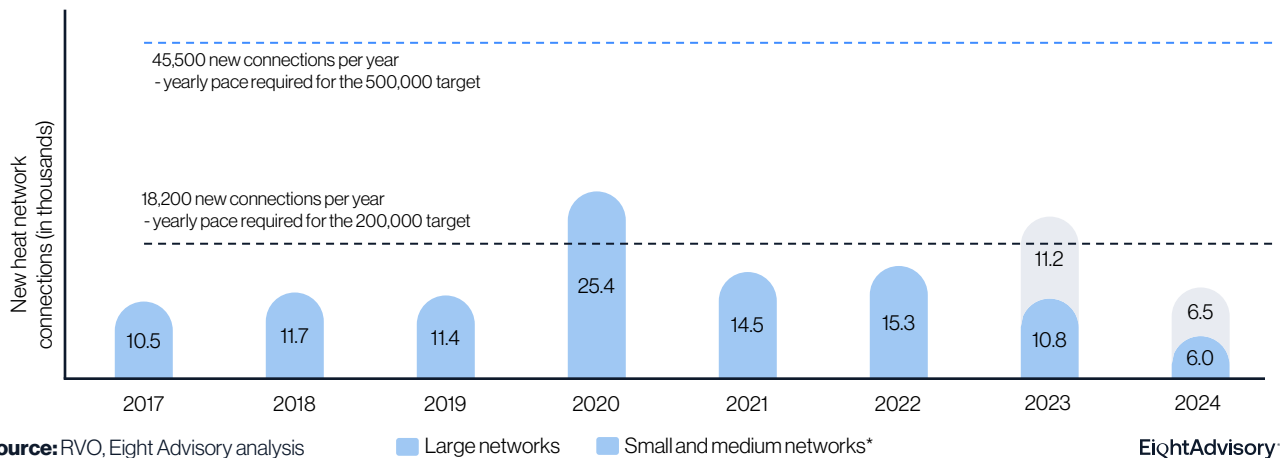
- Vattenfall has announced a formal review of the ownership of its district heating portfolios in the Netherlands, described as a response to "evolving regulation and market conditions including the new Heat Act."<sup>10,44</sup>
- Annual report FY2025: "In general, the heat transition has experienced significant delays due to the decision to require majority public ownership of heat companies."<sup>44</sup>
- Annual report FY2025: "...the Dutch heat sector has had to postpone certain large investments due to insufficient investment certainty from the Ministry."<sup>44</sup>

# Meeting the government's 2030 target will require a significant acceleration in district heating connections

**New heat network connections are running well below the pace needed for the 2030 target. Across all networks, new connections fell from c. 22,000 in 2023 to c. 12,500<sup>14</sup> in 2024, amid uncertainty over the Wcw. The government has cut its target by 60%<sup>15,16</sup> but is still struggling to reach the revised target.**

- The Klimaatakkoord in 2019 set a target<sup>1)</sup> of 500,000<sup>15,45</sup> new district heating connections by 2030, implying a pace of 45,500 new connections per year over the full 11-year period<sup>15,45</sup>. Since then, new district heating connections have run well below the targeted pace.
- As such, an increase of yearly new district heating connections was needed to reach the Klimaatakkoord target by 2030. However, the uncertainty around the Wcw and the subsequent halt in investment made it even harder to reach the target<sup>15</sup>.
- In 2025, the then Minister of Climate and Green Growth noted that meeting the original target would require a five-fold increase in the pace of new connections, to more than 50,000<sup>46</sup> a year, and the PBL concluded that the target was *out of reach*<sup>15</sup>. The cabinet has confirmed a 60% cut in the 2030 target, from 500,000 to 200,000 new connections, now written into the 2027 budget<sup>15,16</sup>.
- Even this revised target requires a material acceleration from the current pace.

**Figure 5: Net increase in district heating network connections (2017–2024)**



\*From 2021 onwards, RVO publishes the connections of small and medium networks next to large-scale networks. The 2022 increase in small and medium networks is significantly larger than the other years, and as such we deem it unreliable and have excluded it. Hence, their increase is only shown from 2023 onwards. It is unclear if these small and medium sized networks form part of the target set by the government.

**The delayed district heating connections generate costs beyond the heating sector.** As noted before, the alternative to district heating is either adding more heat pumps (adding extra load to an already congested power grid) or remaining on gas (with higher associated CO<sub>2</sub> emissions and costs for consumers). Both of these options create costs that are not borne by the heating sector, but by every household and company in the Netherlands.

Notes: 1) The Klimaatakkoord itself sets the target as 40 PJ of heat delivery from heat networks<sup>45</sup>. The 500,000 connections is the operationalisation of that PJ figure.

## Small collective heat systems are already attracting private capital and are expected to consolidate

**As already noted, small collective heat systems (up to 1,500 connected users) can operate under an exemption from the designation requirement, and so without the public-majority requirement<sup>7</sup>. This is the segment where investment is continuing, and where the private market model is demonstrably working. This segment includes:**



WKO installations (warmte-koudeopslag):  
open and closed aquifer thermal energy  
storage, ground-source heat



Decentralised heat-and-cold networks  
serving individual buildings or small clusters

**Two recent transactions confirm this segment is investable today.**

**2024**

Buyer



Target



- Provides low-carbon energy infrastructure for the residential and commercial real estate sectors
- 100,000+ connections across the Netherlands
- 350+ projects
- Partners Group press release: “[Eteck] benefits from resilient and predictable infrastructure characteristics, including long-term contracts of up to 30 years, high barriers to entry, and a supportive regulatory framework.”<sup>24</sup>

**2023**

Buyer



Target



- A leading player in WKO installations, focused on sustainable end-to-end heating and cooling solutions for households and businesses in the Netherlands.
- Resi Becker, CEO Essent: “We are convinced that, by combining Essent and Equans Energy Solutions, we can further accelerate the energy transition together with our people and our customers.”<sup>25</sup>

The Wcw introduces heavier reporting requirements even for smaller operators. ACM's technical briefing identifies more than 500 small collective heat systems, many operated by single-asset companies without the compliance infrastructure to absorb new requirements<sup>47</sup>. **We expect a consolidation opportunity in this segment as the framework takes effect, creating a buy-and-build thesis for operators and investors with scale.**



# Financing needed to realise the Dutch district heating ambitions

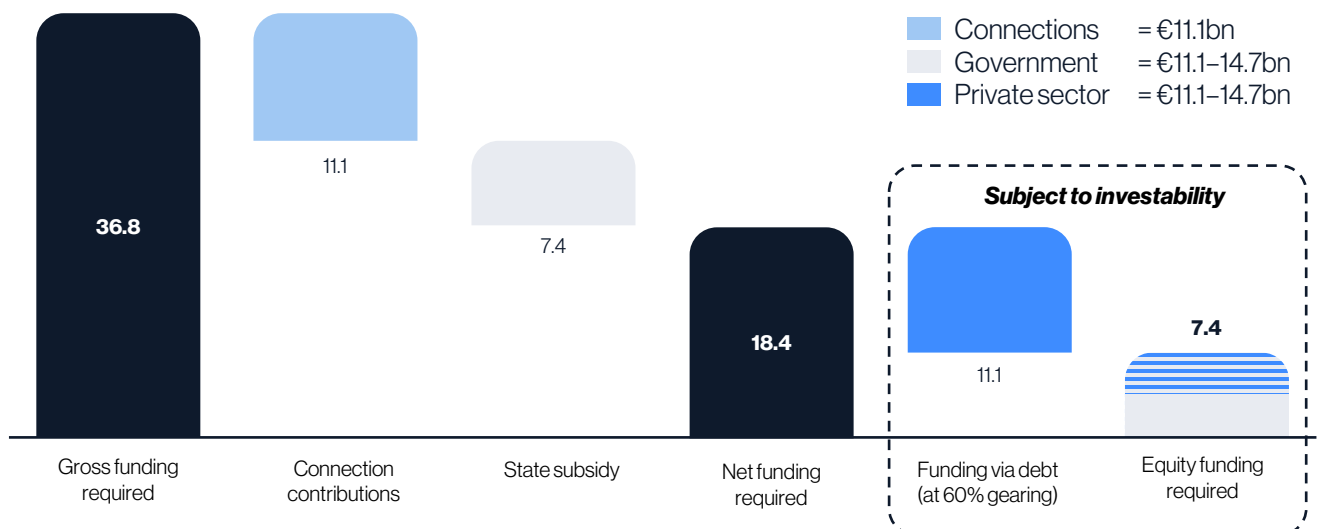
## The government's share of the total costs could reach up to €20bn (1/2)

**The Netherlands has already built roughly 0.6m connections to district heating<sup>14,17</sup>.** Reaching the government's 2050 target of 2.6m connections requires building an additional 2.0m<sup>19</sup>. In today's prices, this is estimated to cost €36.8bn, or €18,425 per connection<sup>20,21</sup>. The cost of the infrastructure build-out will be split between:

- 1. Connection contributions account for €11.1bn.** This represents 30% of gross investment, generally collected when connections are made.
- 2. State subsidy: €7.4bn.** Up to a further 20% is covered by public subsidies.
- 3. Banks and other lenders provide €11.1bn of debt.** Debt is expected to cover 60% of the remaining €18.4bn, subject to project bankability and any required guarantees.
- 4. A further €7.4bn of equity is required, of which public entities would need to provide at least €3.8bn.** Private investors could provide the remaining €3.6bn, subject to making the investment sufficiently appealing (refer to pages 25–26); if they do not participate, the full €7.4bn equity requirement must be borne by public entities.



**Figure 6: Who provides the upfront funding for the €36.8bn roll-out? (in €bn)**



Source: RVO, Greenvis, CBS, Eight Advisory analysis

EightAdvisory

## The government's share of the total costs could reach up to €20bn (2/2)

**A further €2–5bn may be needed to acquire existing systems from private operators.** In January 2025, the government-appointed adviser reportedly put the cost of buying out Vattenfall, Eneco, and part of Ennatuurlijk at €2–3bn; in response, Eneco suggested c. €4bn<sup>22,23</sup>. In the Eerste Kamer, Senator Holterhues cited €3–5bn. The then Minister of Climate and Green Growth declined to give a figure, citing the State's negotiating position<sup>22</sup>. This comes on top of the €11.1–14.7bn of government funding required for new investment, raising the total public capital requirement to as much as €20bn.

**The Dutch government already faces a stretched public investment agenda.** At the NATO Hague Summit in June 2025, the Netherlands committed to lifting defence and security spending to 5% of GDP by 2035<sup>48</sup>, up from c. 2.5% today<sup>49</sup> (an additional c. €30bn per annum based on 2025 GDP of €1.2trn<sup>49</sup>). On top of this, c. €212bn of net investment is needed in the Dutch electricity grid over 2026–2040, largely by government related entities (regional DSOs and TenneT) which will likely require further equity funding to support these investments<sup>50,51,52,53</sup>. De Nederlandsche Bank already projects that the combined public spending commitments will push public debt above the EU's 60% of GDP reference threshold from 2034 onwards<sup>54</sup>. Against this backdrop, the investment required to deliver the district heating transition arrives on top of an already constrained fiscal situation, highlighting the need for private capital contributions and efficient financing structures for the district heating investments.



“ At an estimated investment of €37bn, making the sector attractive for public-private partnerships is key.

Martijn van Heugten, Partner Eight Advisory



# Implications of the *Wet collectieve warmte* on tariffs and operators

## Sector returns have averaged 3.9% since 2013, below today's 7.3% allowed return. A cost-plus regulation could therefore increase consumer bills significantly

In short, cost-plus regulation means a system's allowed revenue should cover its costs plus a reasonable return. When a system's actual return falls short of the allowed WACC, tariffs may move up to close the gap; when it exceeds the WACC, tariffs should move down. The exact parameters of the Wcw's cost-based revenue regulation have not yet been finalised, but in principle a cost-plus mechanism works as follows.

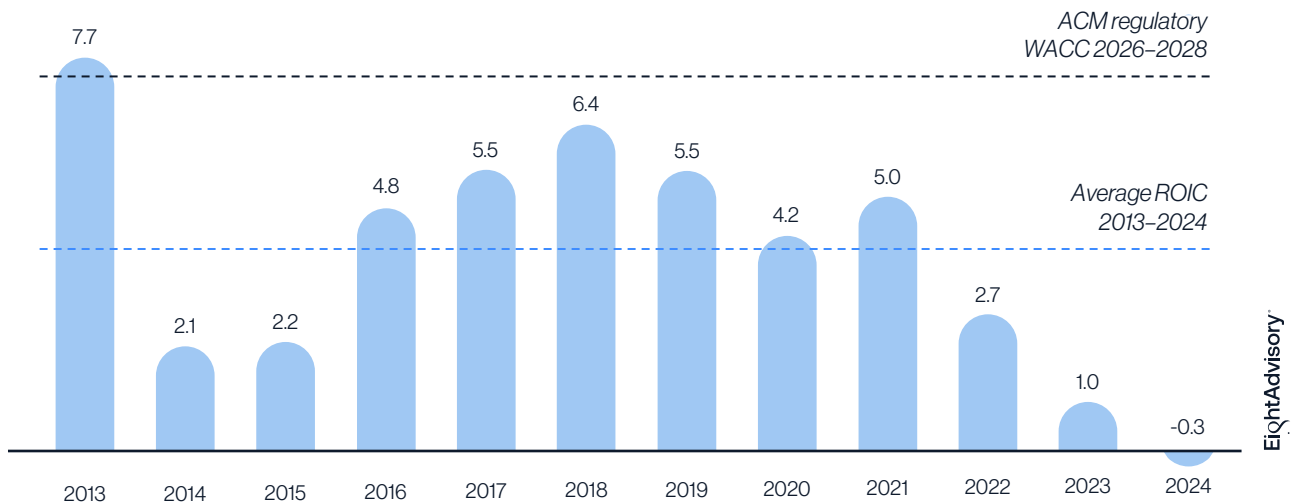
$$\text{Allowed Revenue} = \text{opex} + (\text{RAB} \times \text{WACC}) + \text{depreciation of RAB}$$

ACM has set the allowed return for Dutch heat suppliers at 7.3%<sup>18</sup> for 2026–2028<sup>19</sup>. ACM's *rendementsmonitoring*, however, shows an average sector ROIC of just 3.9%<sup>ii)</sup> over 2013–2024<sup>17,55</sup>. This indicates a gap of more than 3 percentage points that a cost-plus mechanism would allow district heating operators to close through tariff increases.

**This could mean a significant increase in average consumer tariffs.**

Furthermore, how that additional cost is shared across consumers depends on how far each operator's current return already sits from the 7.3% benchmark. The ROIC varies significantly between heating operators today (from –56% to +15%), indicating that a cost-plus model would affect consumers very differently depending on their operator<sup>17</sup>. As a quantification, an analysis by ACM economists shows that tariffs could vary by a factor of five between the cheapest and most expensive network under a cost-plus regulation, and that roughly half of consumers could face higher bills than under the current NMDA cap<sup>56</sup>.

**Figure 7: Average yearly ROIC (%) for Netherlands heating operators from 2013–2024**



**Source:** ACM, Eight Advisory analysis

\*From 2024, ACM separately reports regulated ( $\leq 100$  kW) and unregulated ( $> 100$  kW) segments under new Regulatory Accounting Rules; the blended –0.3% reflects +3.7% regulated vs. –8.6% unregulated<sup>17</sup>. Prior years (2013–2023) used different cost-allocation rules and aren't directly comparable.

Notes: i) Pre-tax WACC, 6.8% plus a conditional 0.5% surcharge for asymmetric risk<sup>18</sup>. ii) ACM's *rendementsmonitoring* calculates ROIC on book asset value net of capitalised customer contributions, not on RAB. This may not align exactly with how RAB is set under the Wcw<sup>17</sup>.

ACM’s regulatory choices on the RAB and WACC will be important for investors as well as consumers as this is a balancing act between affordability and investor returns (1/2)

**As set out on the previous page, the cost-plus regulation is expected to result in increased heat tariffs. The regulatory design choices ahead (and especially ACM’s definition of the RAB and WACC) determine to what extent these tariff increases will materialise, or whether the district heating operators will have to accept lower returns instead.**

If the RAB is set close to asset book values, operators can in principle reach the 7.3% allowed return, but consumers pay for it through higher tariffs, as shown on the previous page. If the RAB is set below book values, consumers are protected from tariff increases, but operators earn less than the 7.3% allowed return<sup>i)</sup>, and would likely have to sell any future stake at a price below what they invested. ACM's draft start-RAB method, published in September 2026, sets book value as the ceiling: the RAB starts from book value and can mainly be adjusted downwards, for past revaluations, poor technical condition or lower-than-planned customer numbers<sup>39</sup>. As such, ACM's final decision on these adjustments (expected early 2027), as well as other regulatory parameters, will largely decide who pays for the gap between the industry’s actual returns and the allowed returns.

**Figure 8: Implications of RAB<sup>ii)</sup> definition under the ACM draft**

|                                      | RAB is set at asset book values                                                                                                                                                 | RAB is set below asset book values                                                                                                                                                                                            |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| When it applies under ACM draft      | <ul style="list-style-type: none"> <li>Systems with no past revaluations, in good technical condition, with customer numbers in line with plan</li> </ul>                       | <ul style="list-style-type: none"> <li>Systems with past revaluations, poor technical condition, or customer numbers below plan</li> </ul>                                                                                    |
| Operator return                      | <ul style="list-style-type: none"> <li>Can reach ROIC in line with regulatory WACC</li> </ul>                                                                                   | <ul style="list-style-type: none"> <li>Invested capital not recovered through tariffs leading to potential write-downs on previous investments</li> </ul>                                                                     |
| Consumer impact                      | <ul style="list-style-type: none"> <li>Roughly half of consumers pay more than under NMDA</li> <li>Tariff spread up to a factor of five across networks<sup>56</sup></li> </ul> | <ul style="list-style-type: none"> <li>Consumers broadly protected from tariff increases (depending on how big the difference between RAB and book value is)</li> <li>Tariff spread between systems still expected</li> </ul> |
| Implications for future transactions | <ul style="list-style-type: none"> <li>Sellers exit at or near invested capital, buyers acquire at book value<sup>iii)</sup></li> </ul>                                         | <ul style="list-style-type: none"> <li>Sellers exit below invested capital<sup>iii)</sup></li> <li>Buyers acquire at a discount that can offset the inherited below-WACC return.</li> </ul>                                   |

Source: Eight Advisory analysis EightAdvisory

Notes: i) Refers to the return for the current regulatory period, which may not be reflective of the future allowed return. ii) RAB is assumed here to approximate the fixed asset base, not full invested capital. iii) Assuming the transaction price equals RAB and regulatory allowed return in line with market return; however, real-world multiples vary.

ACM's regulatory choices on the RAB and WACC will be important for investors as well as consumers as this is a balancing act between affordability and investor returns (2/2)

Apart from where the RAB is set, the Ministry can make separate decisions that soften the transition (where many consumers could otherwise pay more than under the current cap, as set out on the previous page) into a cost-plus regulation and shift who ultimately pays; for example:

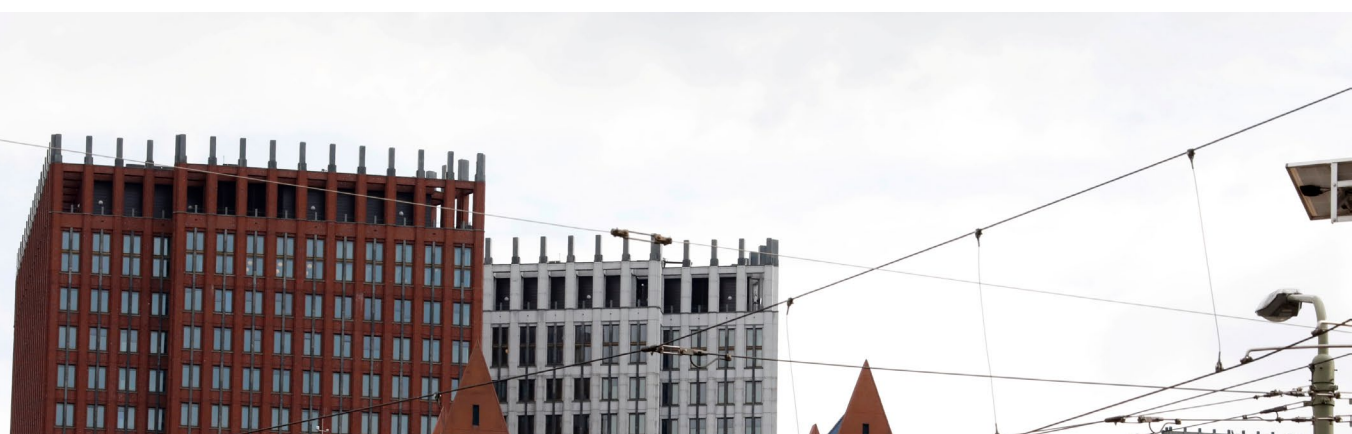
- **Cost equalisation** - consumers on cheaper systems cross-subsidise more expensive ones
- **Price guarantees** - move cost from consumers to operators or the public sector by capping tariff rises.

No legislative text on their design is available today, and which approach the Ministry takes is still open.

“

*The energy transition cannot wait for every regulatory detail to be finalised. While uncertainty around the Wcw and constrained project financing have slowed investment across the sector, the need for sustainable heat infrastructure continues to grow. We believe the main players in this market will be those with the operational track record, technical expertise, regulatory preparedness, and financial strength to invest through uncertainty. Eteck is already operating at scale today, and we intend to further strengthen this position by playing a leading role in consolidating and professionalizing the Dutch heat market for the long term.*

Ton Louwers, CFO, Eteck





# Our recommendations

# Greater visibility on key regulatory decisions is needed to make the Dutch heating market investable (1/2)

**ACM decisions on asset valuation, benchmarking and the long-term return commitment shape everything else. We recommend all three are published sooner rather than later, so investors can price deals and commit to long-term investments with confidence.**

## 01. RAB (Regulated Asset Base) methodology

ACM sets the rules for how RAB is calculated. RAB is a central parameter for both revenue regulation (allowed revenue is built on  $RAB \times WACC$ ) and for transaction value, since it typically anchors what a seller receives when a system is sold. It won't be the only factor deciding the transaction price, as competition, growth and buyer expectations often push deal values above RAB, but it sets the starting point. ACM published a draft start-RAB method in September 2026 and expects to finalise it in early 2027<sup>5,39</sup>. However, the start-RAB for individual systems will only be known once ACM takes its first individual decisions, expected in 2027–2028<sup>9</sup>. Until then, uncertainty will remain.

## 02. Long-term WACC

ACM has set the allowed return at 7.3% for 2026–2028<sup>18</sup> but has not yet committed to a WACC methodology or review period beyond that date. For electricity and gas grids, ACM publishes multi-year decisions (*methodebesluiten*) giving operators and investors visibility over the full regulatory period. We recommend that ACM applies the same approach to the heat sector, so investors and public companies can plan against a known long-term benchmark rather than just the current 7.3%. This is as important as the RAB methodology itself.

## 03. Benchmarking methodology

From Phase 2, ACM plans to compare each operator's costs against a sector-wide efficiency benchmark, and only allow costs within that benchmark to be recovered through tariffs<sup>9</sup>. The detailed rules have not been published, so it's unclear how above-benchmark operators would be treated, or whether more efficient ones could earn more. Benchmarking will likely matter less than the RAB or WACC decisions, but full implementation is unlikely before 2034<sup>9</sup>. We recommend that ACM publishes its initial thinking now as an easy way to clear up a source of uncertainty early, especially given the complexity of the heating sector and varying degrees of financial performance.

Resolved by

Autoriteit  
Consument & Markt



Autoriteit  
Consument & Markt



Autoriteit  
Consument & Markt



## Greater visibility on key regulatory decisions is needed to make the Dutch heating market investable (2/2)

**Whether the Wcw leads to real transactions now depends on government and private parties agreeing next steps. We recommend that the following three items are clarified by the Ministry: how ownership transfers are priced, how consumers are protected, and what rights private investors get.**

### 04. Valuation framework for ownership transfers

The Wcw requires a private-to-public transfer once the transitional designation ends. However, asset transfers should preferably start earlier and not be postponed until the transitional designation ends<sup>7,29</sup>. This would require a clear valuation mechanism.

We suggest anchoring the transaction price to the RAB, or a multiple of it, with a compensation mechanism (paid in either direction where the final RAB differs from the assumed RAB). This would give sellers certainty and protect public buyers from overpaying. At the same time, this would mean transaction processes can get realised sooner, such that investments can restart.

### 05. Transition rules

Cost equalisation or price guarantees are the two tools likely needed to manage the tariff differences described earlier, where many households could otherwise pay more than under the current cap. Which tool the Ministry picks, and how far it goes, is still open. We recommend the Ministry decide its approach soon, since this choice will largely determine which Dutch district heating assets are attractive to private investors under the new regime.

### 06. Minority shareholder rights framework

The Wcw requires public-majority ownership but doesn't say what rights a private minority shareholder (up to 49%) can hold, potentially making investors hesitant to invest as minority shareholders<sup>7,57</sup>.

We recommend publishing a clear governance framework, taking into account minority shareholder protection that would keep private capital as a funding source, reducing the financing burden that would otherwise fall on state-owned companies. Three categories need clarity: (1) voting and veto rights over material decisions, (2) fair board representation, and (3) exit mechanisms enabling a secondary market.

With dozens of private heat companies and many municipalities set to negotiate public-majority structures, often on the same issues, negotiating each shareholder agreement from scratch would be slow and could lead to inconsistencies<sup>14</sup>. We recommend the Ministry, municipalities and the private sector agree on a model shareholder agreement, covering these protections, so each transfer can move faster.

Resolved by



**Government of  
the Netherlands**



**Government of  
the Netherlands**



**Government of  
the Netherlands**

+

**Private and  
public parties**

## Conclusion

### **The Dutch district heating sector is not structurally broken.**

Private capital hasn't left; it's waiting for the regulatory parameters covered in this paper to be set and clear guidance on its future role as a minority investor. Once these are established, real opportunities will be available: ownership transfers, new public-majority vehicles looking for private co-investment, and further consolidation among small collective heat systems. The investors who use the current pause to build their view on where regulation is heading will be the ones positioned to move first and capture the best terms, once the market opens.



## How we can help

**Eight Advisory supports** investors, operators and municipalities to anticipate regulatory developments and prepare for the opportunities that they will bring:

### Regulatory financial modelling and scenario analysis

We make sure you know your numbers before the market moves. We model how tariffs, cashflows and asset values would look under each regulatory scenario, system by system, so you can price a deal, respond to ACM, communicate with your customers, or get an investment committee to say yes, before your competitors can.

### Transaction advisory

We help private operators structure and price an exit ahead of the 2037 deadline, and help municipalities and public-majority buyers on the other side of the table with due diligence, deal structure and governance after the transaction closes.

### Strategic options and scenario analysis

We help you navigate the Wcw's ownership requirement, so your decisions fit your own goals and long-term strategy:

- For private operators, we help decide whether to hold, exit or restructure, model what each option means financially under different regulatory scenarios, and advise on timing against the 2037 deadline, including the risk of write-downs where returns fall structurally short of the allowed return.
- For municipalities, we advise on what taking on a transitional designation actually costs, including whether to take on the system through a wholly municipal heat company or a public-majority vehicle with private co-investors, and what funding that choice commits you to.
- For state-owned companies buying in as the public-majority partner, we help structure the acquisition, the mix of equity and debt behind it, and room for private minority investors.

### Minority shareholder rights framework

Getting governance right upfront avoids disputes later. We advise private investors and state-owned companies on what protections belong in the shareholder agreements (such as joint-control rights, veto rights on major decisions, and agreed ways to exit) and support both sides through the negotiation.

### Buy-and-build advisory in small collective heat systems

This part of the market doesn't have to wait. Small collective heat systems can operate under an exemption from the designation requirement, and so outside the public-ownership rules, and are already consolidating. We help investors find targets, build a platform strategy, and get deals financed, now, regardless of how the larger regulatory questions are resolved.

# Contact our experts and see how we can help you

**Martijn van Heugten**

Partner | Infrastructure & Energy,  
Strategic Valuations & Modelling  
Amsterdam  
[martijn.vanheugten@8advisory.com](mailto:martijn.vanheugten@8advisory.com)

**Lionel Gérard**

Partner | Group Infrastructure  
& Energy Leader  
Paris  
[lionnel.gerard@8advisory.com](mailto:lionnel.gerard@8advisory.com)

**Niels Lummen**

Partner | Infrastructure & Energy,  
Transaction Services  
Amsterdam  
[niels.lummen@8advisory.com](mailto:niels.lummen@8advisory.com)

**Kai Karring**

Partner | Infrastructure & Energy, Strategy  
Zurich  
[kai.karring@8advisory.com](mailto:kai.karring@8advisory.com)

**Thomas Gummert**

Partner | Infrastructure & Energy,  
Strategic Valuations & Modelling  
Hamburg  
[thomas.gummert@8advisory.com](mailto:thomas.gummert@8advisory.com)

**Tom Brown**

Director | Infrastructure & Energy  
London  
[tom.brown@8advisory.com](mailto:tom.brown@8advisory.com)

**Anton Nordström**

Senior Manager | Infrastructure & Energy  
Amsterdam  
[anton.nordstrom@8advisory.com](mailto:anton.nordstrom@8advisory.com)

## Authors

**Martijn van Heugten**

Partner | Infrastructure & Energy,  
Strategic Valuations & Modelling  
Amsterdam  
[martijn.vanheugten@8advisory.com](mailto:martijn.vanheugten@8advisory.com)

**Niels Lummen**

Partner | Infrastructure & Energy,  
Transaction Services  
Amsterdam  
[niels.lummen@8advisory.com](mailto:niels.lummen@8advisory.com)

**Anton Nordström**

Senior Manager | Infrastructure & Energy  
Amsterdam  
[anton.nordstrom@8advisory.com](mailto:anton.nordstrom@8advisory.com)

**Freddie Bowes**

Analyst | Infrastructure & Energy  
Amsterdam  
[freddie.bowes@8advisory.com](mailto:freddie.bowes@8advisory.com)

## Sources (1/3)

| No. | Source                                                                                                                                                                                                                                                                                                                                                                                     |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1   | CBS (2026). Hoofdverwarmingsinstallaties woningen, 2025. <a href="https://www.cbs.nl/nl-nl/maatwerk/2026/30/hoofdverwarmingsinstallaties-woningen-2025">https://www.cbs.nl/nl-nl/maatwerk/2026/30/hoofdverwarmingsinstallaties-woningen-2025</a> .                                                                                                                                         |
| 2   | CBS (2025). Hoofdverwarmingsinstallaties woningen, 2022-2024. <a href="https://www.cbs.nl/nl-nl/maatwerk/2025/34/hoofdverwarmingsinstallaties-woningen-2022-2024">https://www.cbs.nl/nl-nl/maatwerk/2025/34/hoofdverwarmingsinstallaties-woningen-2022-2024</a> .                                                                                                                          |
| 3   | Rijksoverheid. 'Maatregelen tegen vol elektriciteitsnet (netcongestie)'. <a href="https://www.rijksoverheid.nl/themas/klimaat-milieu-en-natuur/duurzame-energie/kabinet-neemt-maatregelen-tegen-vol-elektriciteitsnet-netcongestie">https://www.rijksoverheid.nl/themas/klimaat-milieu-en-natuur/duurzame-energie/kabinet-neemt-maatregelen-tegen-vol-elektriciteitsnet-netcongestie</a> . |
| 4   | Minister KGG (2026). Kamerstukken II 36576, nr. 121. <a href="https://zoek.officielebekendmakingen.nl/kst-36576-121.html">https://zoek.officielebekendmakingen.nl/kst-36576-121.html</a> .                                                                                                                                                                                                 |
| 5   | ACM (2026). De Wet collectieve warmte (Wcw) webpage. <a href="https://www.acm.nl/nl/energie/warmte-en-koude/de-wet-collectieve-warmte-wcw">https://www.acm.nl/nl/energie/warmte-en-koude/de-wet-collectieve-warmte-wcw</a> .                                                                                                                                                               |
| 6   | Inwerkingtredingsbesluit Wcw (2026). Staatsblad 2026, 31. <a href="https://zoek.officielebekendmakingen.nl/stb-2026-31.html">https://zoek.officielebekendmakingen.nl/stb-2026-31.html</a> .                                                                                                                                                                                                |
| 7   | Wet collectieve warmte, Stb. 2026, 10. <a href="https://zoek.officielebekendmakingen.nl/stb-2026-10.html">https://zoek.officielebekendmakingen.nl/stb-2026-10.html</a> .                                                                                                                                                                                                                   |
| 8   | Landsadvocaat (2025). Wcw advies verplicht publiek meerderheidsbelang. <a href="https://www.rijksoverheid.nl/documenten/rapporten/2025/03/27/wcw-advies-landsadvocaat-25-maart-2025-verplicht-publiek-meerderheidsbelang">https://www.rijksoverheid.nl/documenten/rapporten/2025/03/27/wcw-advies-landsadvocaat-25-maart-2025-verplicht-publiek-meerderheidsbelang</a> .                   |
| 9   | ACM (2026). Routekaart voorbereidingen Wet collectieve warmte. <a href="https://www.acm.nl/nl/publicaties/acm-publiceert-routekaart-voorbereidingen-wet-collectieve-warmte">https://www.acm.nl/nl/publicaties/acm-publiceert-routekaart-voorbereidingen-wet-collectieve-warmte</a> .                                                                                                       |
| 10  | Vattenfall press release (2025). 'Vattenfall assesses ownership of district heating operations'. <a href="https://group.vattenfall.com/press-and-media/pressreleases/2025/vattenfall-assesses-ownership-of-district-heating-operations/">https://group.vattenfall.com/press-and-media/pressreleases/2025/vattenfall-assesses-ownership-of-district-heating-operations/</a> .               |
| 11  | Vattenfall Warmte (2025). Jaarbericht Warmte Nederland 2024. <a href="https://group.vattenfall.com/nl/siteassets/vattenfall-nl-newsroom-assets/images-and-docs/2025/07-july/vattenfall_jaarbericht-warmte-2024.pdf">https://group.vattenfall.com/nl/siteassets/vattenfall-nl-newsroom-assets/images-and-docs/2025/07-july/vattenfall_jaarbericht-warmte-2024.pdf</a> .                     |
| 12  | Architectenweb (citing FD) (2025). Eneco CEO Ron Wit on the sale of the heat business. <a href="https://architectenweb.nl/nieuws/artikel.aspx?id=59947">https://architectenweb.nl/nieuws/artikel.aspx?id=59947</a> .                                                                                                                                                                       |
| 13  | Ennatuurlijk (2025). Jaaroverzicht 2024. <a href="https://ennatuurlijk.nl/sites/default/files/2025-06/ENN_Jaaroverzicht_2024_0.pdf">https://ennatuurlijk.nl/sites/default/files/2025-06/ENN_Jaaroverzicht_2024_0.pdf</a> .                                                                                                                                                                 |
| 14  | RVO (2025). Overzicht duurzaamheid warmtenetten in 2024. <a href="https://www.rvo.nl/sites/default/files/2025-10/Overzicht-duurzaamheid-warmtenetten-in-2024.pdf">https://www.rvo.nl/sites/default/files/2025-10/Overzicht-duurzaamheid-warmtenetten-in-2024.pdf</a> .                                                                                                                     |
| 15  | PBL (2025). Klimaat- en Energieverkenning 2025. <a href="https://www.pbl.nl/system/files/document/2025-09/pbl-2025-klimaat-en-energieverkenning-2025-5692.pdf">https://www.pbl.nl/system/files/document/2025-09/pbl-2025-klimaat-en-energieverkenning-2025-5692.pdf</a> .                                                                                                                  |
| 16  | Rijksbegroting 2027 (2026). Memorie van toelichting, chapter XXIII (KGG). <a href="https://www.rijksfinancien.nl/memorie-van-toelichting/2027/OWB/XXIII">https://www.rijksfinancien.nl/memorie-van-toelichting/2027/OWB/XXIII</a> .                                                                                                                                                        |
| 17  | ACM (2025). Rendementsmonitor warmteleveranciers 2024. <a href="https://www.acm.nl/nl/publicaties/rendementsmonitor-warmteleveranciers-2024">https://www.acm.nl/nl/publicaties/rendementsmonitor-warmteleveranciers-2024</a> .                                                                                                                                                             |
| 18  | ACM (2026). Gewijzigd besluit redelijk rendement warmteleveranciers 2026-2028. <a href="https://www.acm.nl/system/files/documents/gewijzigd-besluit-redelijk-rendement-warmteleveranciers-2026-2028.pdf">https://www.acm.nl/system/files/documents/gewijzigd-besluit-redelijk-rendement-warmteleveranciers-2026-2028.pdf</a> .                                                             |
| 19  | Rijksoverheid (2026). 'Meer huizen en gebouwen aansluiten op collectieve warmte'. <a href="https://www.rijksoverheid.nl/themas/klimaat-milieu-en-natuur/energie-thuis/meer-huizen-en-gebouwen-aansluiten-op-collectieve-warmte">https://www.rijksoverheid.nl/themas/klimaat-milieu-en-natuur/energie-thuis/meer-huizen-en-gebouwen-aansluiten-op-collectieve-warmte</a> .                  |
| 20  | Greenvis for EZK (2022). Investeringsopgave warmte-infrastructuur. <a href="https://open.overheid.nl/documenten/ronl-9230da0fe4c712deff3cc54a5298ef77b67c0844/pdf">https://open.overheid.nl/documenten/ronl-9230da0fe4c712deff3cc54a5298ef77b67c0844/pdf</a> .                                                                                                                             |
| 21  | CBS StatLine 86049NED (2026). GWW input price index (2020=100), series 4221 Civil engineering works. <a href="https://www.cbs.nl/nl-nl/cijfers/detail/86049NED">https://www.cbs.nl/nl-nl/cijfers/detail/86049NED</a> .                                                                                                                                                                     |
| 22  | Eerste Kamer (2025). Handelingen 2 Dec 2025, Wet collectieve warmte (Senator Holterhues, ChristenUnie). <a href="https://www.eerstekamer.nl/verslagdeel/20251202/wet_collectieve_warmte_2">https://www.eerstekamer.nl/verslagdeel/20251202/wet_collectieve_warmte_2</a> .                                                                                                                  |
| 23  | RTL Z (2025). 'Miljardeninvesteringen voor uitkoop warmtebedrijven' (verkenner Frans Rooijers). <a href="https://www.rtl.nl/nieuws/economie/artikel/5490749/opkopen-private-warmtenetten-kost-2-tot-3-miljard-euro">https://www.rtl.nl/nieuws/economie/artikel/5490749/opkopen-private-warmtenetten-kost-2-tot-3-miljard-euro</a> .                                                        |
| 24  | Partners Group press release (2024). Acquisition of Eteck. <a href="https://www.partnersgroup.com/en/news-and-views/press-releases/investment-news/detail?news_id=32d24918-cf03-4f4e-8636-073458fc1256">https://www.partnersgroup.com/en/news-and-views/press-releases/investment-news/detail?news_id=32d24918-cf03-4f4e-8636-073458fc1256</a> .                                           |
| 25  | Essent (2023). 'Essent heeft akkoord bereikt om Equans Energy Solutions over te nemen'. <a href="https://www.essent.nl/over-essent/nieuws/essent-heeft-akkoord-bereikt-om-equans-energy-solutions-over-te-nemen/">https://www.essent.nl/over-essent/nieuws/essent-heeft-akkoord-bereikt-om-equans-energy-solutions-over-te-nemen/</a> .                                                    |
| 26  | CBS (2025). Monitor Warmtepompen 2025 (StatLine 81528NED). <a href="https://www.cbs.nl/nl-nl/longread/aanvullende-statistische-diensten/2025/monitor-warmtepompen-2025">https://www.cbs.nl/nl-nl/longread/aanvullende-statistische-diensten/2025/monitor-warmtepompen-2025</a> .                                                                                                           |

## Sources (2/3)

| No. | Source                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 27  | Installatiemonitor (2025). 'Netimpact warmtepompen in de gebouwde omgeving'. <a href="https://www.installatiemonitor.nl/wp-content/uploads/2025/04/Rapportage-Netimpact-warmtepompen-in-de-gebouwde-omgeving.pdf">https://www.installatiemonitor.nl/wp-content/uploads/2025/04/Rapportage-Netimpact-warmtepompen-in-de-gebouwde-omgeving.pdf</a> .                                                                                           |
| 28  | RVO (2023). Duurzaamheid van warmte- & koudelevering (rekenmethode). <a href="https://www.rvo.nl/sites/default/files/2023-02/Rapport-Duurzaamheid-warmtelevering-2023.pdf">https://www.rvo.nl/sites/default/files/2023-02/Rapport-Duurzaamheid-warmtelevering-2023.pdf</a> .                                                                                                                                                                 |
| 29  | Besluit collectieve warmte (2026). Voorhang version (concept AMvB; also published by the Tweede Kamer as 2026D25935). <a href="https://open.overheid.nl/documenten/d5975c54-b593-4850-96f0-29391d68b5b7/file">https://open.overheid.nl/documenten/d5975c54-b593-4850-96f0-29391d68b5b7/file</a> <a href="https://www.tweedekamer.nl/downloads/document?id=2026D25935">https://www.tweedekamer.nl/downloads/document?id=2026D25935</a> .      |
| 30  | Greenvis for RVO (2024). 'Impact broeikasgassenormering van de Wcw op warmtenetten'. <a href="https://open.overheid.nl/documenten/1d976a6e-b1ca-4e8b-8d8a-9d5bcdfe95ea/file">https://open.overheid.nl/documenten/1d976a6e-b1ca-4e8b-8d8a-9d5bcdfe95ea/file</a> .                                                                                                                                                                             |
| 31  | HVC news (2025). 'Duurzaamste grote warmtenet van Nederland ligt in Dordrecht'. <a href="https://www.hvcgroep.nl/ons-verhaal/nieuws/duurzaamste-grote-warmtenet-van-nederland-ligt-dordrecht-1">https://www.hvcgroep.nl/ons-verhaal/nieuws/duurzaamste-grote-warmtenet-van-nederland-ligt-dordrecht-1</a> .                                                                                                                                  |
| 32  | Vattenfall (2025). 'Het warmtenet van Arnhem, Duiven en Westervoort'. <a href="https://www.vattenfall.nl/stadsverwarming/warmtenetten-en-warmtebronnen/warmtenet-arnhem/">https://www.vattenfall.nl/stadsverwarming/warmtenetten-en-warmtebronnen/warmtenet-arnhem/</a> .                                                                                                                                                                    |
| 33  | Valmet press release (2025). Helmond power plant turbine automation. <a href="https://www.valmet.com/news/press-releases/2025/valmet-modernizes-the-turbine-automation-at-ennatuurlijk-helmond-power-plant-for-improved-efficiency-and-carbon-neutrality/">https://www.valmet.com/news/press-releases/2025/valmet-modernizes-the-turbine-automation-at-ennatuurlijk-helmond-power-plant-for-improved-efficiency-and-carbon-neutrality/</a> . |
| 34  | Ennatuurlijk (2026). Warmtenet Helmond webpage. <a href="https://ennatuurlijk.nl/leveringsservice/in-jouw-buurt/warmtenet-helmond">https://ennatuurlijk.nl/leveringsservice/in-jouw-buurt/warmtenet-helmond</a> .                                                                                                                                                                                                                            |
| 35  | TenneT (2025). 'Restruimte op het hoogspanningsnet toegewezen'. <a href="https://www.tennet.eu/nl/nieuws/restruimte-op-het-hoogspanningsnet-toegewezen-aan-geinteresseerde-partijen">https://www.tennet.eu/nl/nieuws/restruimte-op-het-hoogspanningsnet-toegewezen-aan-geinteresseerde-partijen</a> .                                                                                                                                        |
| 36  | TenneT (2024). 'Elektriciteitsnet Zuid-Holland bereikt maximale capaciteit voor grootverbruikers'. <a href="https://www.tennet.eu/nl/nieuws/elektriciteitsnet-zuid-holland-bereikt-maximale-capaciteit-voor-grootverbruikers-van-elektriciteit">https://www.tennet.eu/nl/nieuws/elektriciteitsnet-zuid-holland-bereikt-maximale-capaciteit-voor-grootverbruikers-van-elektriciteit</a> .                                                     |
| 37  | Algemene Rekenkamer (2025). 'Een koud bad voor warmtenetten'. <a href="https://www.rekenkamer.nl/documenten/2025/02/04/een-koud-bad-voor-warmtenetten">https://www.rekenkamer.nl/documenten/2025/02/04/een-koud-bad-voor-warmtenetten</a> .                                                                                                                                                                                                  |
| 38  | ACM (2026). 'Onderzoek ACM: warmteleveranciers behaalden geen onredelijke winst'. <a href="https://www.acm.nl/nl/publicaties/onderzoek-acm-warmteleveranciers-behaalden-geen-onredelijke-winst-acm-blijft-rendementen-monitoren">https://www.acm.nl/nl/publicaties/onderzoek-acm-warmteleveranciers-behaalden-geen-onredelijke-winst-acm-blijft-rendementen-monitoren</a> .                                                                  |
| 39  | ACM (2026). Ontwerpmethodebesluit vaststelling Start-GAW Warmte (Stcrt. 2026, 32140). <a href="https://www.acm.nl/nl/publicaties/ontwerpmethodebesluit-vaststelling-start-gaw-warmte">https://www.acm.nl/nl/publicaties/ontwerpmethodebesluit-vaststelling-start-gaw-warmte</a> .                                                                                                                                                            |
| 40  | Ennatuurlijk (2026). Jaaroverzicht 2025. <a href="https://ennatuurlijk.nl/sites/default/files/2026-06/Jaaroverzicht_2025.pdf">https://ennatuurlijk.nl/sites/default/files/2026-06/Jaaroverzicht_2025.pdf</a> .                                                                                                                                                                                                                               |
| 41  | Eneco press release (2024). 'Laagbouwwoningen in Overvecht-Noord niet geschikt voor betaalbaar warmtenet'. <a href="https://nieuws.eneco.nl/laagbouwwoningen-in-overvecht-noord-niet-geschikt-voor-betaalbaar-warmtenet/">https://nieuws.eneco.nl/laagbouwwoningen-in-overvecht-noord-niet-geschikt-voor-betaalbaar-warmtenet/</a> .                                                                                                         |
| 42  | Eneco (2025). Annual Report 2024. <a href="https://www.eneco.nl/-/media/eneco-com/files/eneco-annual-report-2024.pdf?rev=7883778bb651414e8fd155d9cdc67705&amp;sc_lang=en">https://www.eneco.nl/-/media/eneco-com/files/eneco-annual-report-2024.pdf?rev=7883778bb651414e8fd155d9cdc67705&amp;sc_lang=en</a> .                                                                                                                                |
| 43  | Eneco (2026). Annual Report 2025. <a href="https://view.publitas.com/cfreport/eneco-annual-report-2025/page/7">https://view.publitas.com/cfreport/eneco-annual-report-2025/page/7</a> .                                                                                                                                                                                                                                                      |
| 44  | Vattenfall N.V. (2026). Annual Report 2025. <a href="https://www.vattenfall.nl/media/4.-over-vattenfall-corporate/6.-downloads/vattenfall-nv-annual-report-2025_final_accessible-versie.pdf">https://www.vattenfall.nl/media/4.-over-vattenfall-corporate/6.-downloads/vattenfall-nv-annual-report-2025_final_accessible-versie.pdf</a> .                                                                                                    |
| 45  | Klimaatakkoord (2019). <a href="https://zoek.officielebekendmakingen.nl/blg-892567.pdf">https://zoek.officielebekendmakingen.nl/blg-892567.pdf</a> .                                                                                                                                                                                                                                                                                         |
| 46  | Brief minister KGG aan de Eerste Kamer (Kamerstukken I (2025). 30196, M). <a href="https://www.eerstekamer.nl/behandeling/20250417/brief_van_de_minister_van_kgg_over/document3/f=/vmmsl1yhdsdzr_opgem_aakt.pdf">https://www.eerstekamer.nl/behandeling/20250417/brief_van_de_minister_van_kgg_over/document3/f=/vmmsl1yhdsdzr_opgem_aakt.pdf</a> .                                                                                          |
| 47  | ACM (2025). Presentatie technische briefing tariefregulering Wcw (Tweede Kamer). <a href="https://www.acm.nl/system/files/documents/presentatie-acm-bij-technische-briefing-tariefregulering-wcw.pdf">https://www.acm.nl/system/files/documents/presentatie-acm-bij-technische-briefing-tariefregulering-wcw.pdf</a> .                                                                                                                       |
| 48  | NATO (2025). The Hague Summit Declaration. <a href="https://www.nato.int/en/about-us/official-texts-and-resources/official-texts/2025/06/25/the-hague-summit-declaration">https://www.nato.int/en/about-us/official-texts-and-resources/official-texts/2025/06/25/the-hague-summit-declaration</a> .                                                                                                                                         |
| 49  | NATO (2025). Defence Expenditure of NATO Countries (2014-2025). <a href="https://www.nato.int/content/dam/nato/webready/documents/finance/def-exp-2025-en.pdf">https://www.nato.int/content/dam/nato/webready/documents/finance/def-exp-2025-en.pdf</a> .                                                                                                                                                                                    |
| 50  | Netbeheer Nederland (2026). FIEN 2026 final report. <a href="https://www.netbeheernederland.nl/sites/default/files/2026-03/fien26_-_finaal_rapport.pdf">https://www.netbeheernederland.nl/sites/default/files/2026-03/fien26_-_finaal_rapport.pdf</a> .                                                                                                                                                                                      |

## Sources (3/3)

| No. | Source                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 51  | Netbeheer Nederland (2026). FIEN 2026 news release. <a href="https://www.netbeheernederland.nl/artikelen/nieuws/investeringen-de-energie-infrastructuur-nemen-komende-jaren-verder-toe">https://www.netbeheernederland.nl/artikelen/nieuws/investeringen-de-energie-infrastructuur-nemen-komende-jaren-verder-toe</a> .                                                                                                                                                                                                                                    |
| 52  | Ministerie van Financiën (2025). Kamerbrief TenneT. <a href="https://open.overheid.nl/documenten/327618e3-b39d-427d-8272-4706e5053554/file">https://open.overheid.nl/documenten/327618e3-b39d-427d-8272-4706e5053554/file</a> .                                                                                                                                                                                                                                                                                                                            |
| 53  | Netbeheer Nederland (2022). 'Akkoord over voorwaarden aandeel Staat in netwerkbedrijven'. <a href="https://www.netbeheernederland.nl/artikelen/nieuws/akkoord-over-voorwaarden-aandeel-staat-netwerkbedrijven">https://www.netbeheernederland.nl/artikelen/nieuws/akkoord-over-voorwaarden-aandeel-staat-netwerkbedrijven</a> .                                                                                                                                                                                                                            |
| 54  | DNB (2026). Public finance (projections). <a href="https://www.dnb.nl/en/current-economic-issues/public-finance/">https://www.dnb.nl/en/current-economic-issues/public-finance/</a> .                                                                                                                                                                                                                                                                                                                                                                      |
| 55  | CE Delft for ACM (2019). Rendementsmonitor warmteleveranciers 2017-2018 (Tweede Kamer bijlage). <a href="https://app.1848.nl/document/tkapi/285374">https://app.1848.nl/document/tkapi/285374</a> .                                                                                                                                                                                                                                                                                                                                                        |
| 56  | ESB (Wittrock et al.) (2026). 'Tarieven van warmtenetten kunnen sterk uiteen gaan lopen'. <a href="https://esb.nu/tarieven-van-warmtenetten-kunnen-sterk-uiteen-gaan-lopen/">https://esb.nu/tarieven-van-warmtenetten-kunnen-sterk-uiteen-gaan-lopen/</a> .                                                                                                                                                                                                                                                                                                |
| 57  | Strategy& for EZK (2022). 'Effecten van publiek eigendomsverplichting op de realisatiekracht voor collectieve warmtesystemen'. <a href="https://open.overheid.nl/repository/ronl-107b609537a3bbf57220e6cfe35d835ed71b58e6/1/pdf/rapport-effecten-van-publiek-eigendomsverplichting-op-de-realisatiekracht-voor-collectieve-warmtesystemen.pdf">https://open.overheid.nl/repository/ronl-107b609537a3bbf57220e6cfe35d835ed71b58e6/1/pdf/rapport-effecten-van-publiek-eigendomsverplichting-op-de-realisatiekracht-voor-collectieve-warmtesystemen.pdf</a> . |

## Glossary (1/2)

| Term                                                                                 | Explanation                                                                                                                                   |
|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| ACM ( <i>Autoriteit Consument &amp; Markt</i> )                                      | The Netherlands Authority for Consumers and Markets, an independent regulator responsible for competition and consumer protection.            |
| Algemene Rekenkamer                                                                  | The independent general audit office of the Netherlands, which examines central-government spending, management and policy.                   |
| Allowed return ( <i>redelijk rendement</i> )                                         | ACM's reasonable return for heat suppliers: the return a system's allowed revenue should cover on top of its costs.                           |
| Besluit collectieve warmte (Bcw)                                                     | The Collective Heat Decree, which sets detailed implementing rules under the Wcw.                                                             |
| Collective heat ( <i>collectieve warmte</i> )                                        | Heat produced, transported or supplied through shared infrastructure for multiple users, rather than an individual installation.              |
| Designated heat company ( <i>aangewezen warmtebedrijf</i> )                          | An operator designated by a municipality to be the only party allowed to transport and supply heat within a system (see <i>warmtekavel</i> ). |
| Eerste Kamer                                                                         | The Senate, the upper house of the Dutch Parliament, which reviews and votes on legislation.                                                  |
| Efficient costs                                                                      | Costs considered reasonable and efficient for providing a service, and therefore potentially recoverable through regulated tariffs.           |
| GAW ( <i>gestandaardiseerde activawaarde</i> )                                       | Standardised asset value: the regulator's assessed value of assets used to provide heat.                                                      |
| Grid congestion ( <i>netcongestie</i> )                                              | A condition in which electricity-network capacity is insufficient to accommodate additional demand or connections.                            |
| Heat community ( <i>warmtegemeenschap</i> )                                          | A qualifying community or cooperative legal entity without a profit objective that can operate a collective heat system.                      |
| Heat network ( <i>warmtenet</i> )                                                    | The physical pipes, installations and associated assets that transport heat from a source to users.                                           |
| Individual revenue cap                                                               | A regulatory ceiling on the revenue a heat-system operator may earn.                                                                          |
| Klimaatakkoord (2019 Climate Agreement)                                              | The Netherlands' national agreement setting measures and targets to reduce greenhouse-gas emissions and support the energy transition.        |
| Large district-heating system (RVO category)                                         | A heat network delivering more than 150 TJ of heat annually.                                                                                  |
| Medium district-heating system (RVO category)                                        | RVO's intermediate category between large and small networks (less than 150 TJ but more than 500 connections).                                |
| Minister of Climate and Green Growth ( <i>Minister van Klimaat en Groene Groei</i> ) | The Dutch cabinet minister responsible for the climate and green-growth portfolio.                                                            |

## Glossary (2/2)

| Term                                         | Explanation                                                                                                                                                                                                                                                                                       |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NMDA ( <i>Niet-Meer-Dan-Anders</i> )         | “No more than otherwise”: a principle comparing the cost of heat with the cost of an equivalent gas-heated alternative.                                                                                                                                                                           |
| RAB ( <i>Regulated Asset Base</i> )          | General term for the regulated value of heat-network assets used to calculate allowed cost recovery and returns; ACM's Dutch-regime term is GAW.                                                                                                                                                  |
| Rendementsmonitoring                         | ACM's monitoring of heat suppliers' realised returns, published through its <i>Rendementsmonitor</i> .                                                                                                                                                                                            |
| Residual heat ( <i>restwarmte</i> )          | Heat from industrial processes, data centres or similar sources that can be recovered and used elsewhere.                                                                                                                                                                                         |
| ROIC                                         | Return on Invested Capital: a measure of the operating return earned on invested capital. In ACM's heat-supplier monitoring, it is calculated as heat-activity revenue less energy costs, other operating costs and depreciation, divided by invested asset value less capitalised contributions. |
| Small collective heat systems                | The Wcw category of collective heat systems serving up to 1,500 connected users; these systems can be granted an exemption from the designation requirement but remain subject to tariff regulation.                                                                                              |
| Small district-heating system (RVO category) | A heat network with fewer than 500 connections.                                                                                                                                                                                                                                                   |
| System                                       | In this paper, the English translation of <i>warmtekavel</i> : the regulatory unit for designation, asset valuation and tariff rules, not the physical heat network.                                                                                                                              |
| TenneT                                       | The transmission system operator responsible for managing the Netherlands' high-voltage electricity grid.                                                                                                                                                                                         |
| Transitional designation                     | A temporary designation allowing an existing heat operator to continue serving its area during the transition to the new regulatory framework; the term may be 14–30 years.                                                                                                                       |
| WACC                                         | Weighted Average Cost of Capital: the blended required return on a company's debt and equity, weighted by their proportions in its financing.                                                                                                                                                     |
| Warmtekavel                                  | A geographically defined area for heat supply. English translations include <i>heat parcel</i> and <i>heat plot</i> . In this paper, <i>system</i> is used as the English translation.                                                                                                            |
| Wcw ( <i>Wet collectieve warmte</i> )        | The Dutch Collective Heat Act, which establishes the statutory framework for collective heat supply.                                                                                                                                                                                              |
| WKO ( <i>warmte-koudeopslag</i> )            | Aquifer thermal energy storage: systems that store heat and cold underground for later use.                                                                                                                                                                                                       |

## Paris

37 rue la Boétie  
75008 Paris, France

## Lyon

50, cours Franklin Roosevelt  
69006 Lyon, France

## Nantes

34 rue du Pré Gauchet  
44000 Nantes, France

## Rennes

28 boulevard du Colombier  
35000 Rennes, France

## Marseille

10 place de la Joliette  
13002 Marseille, France

## London

100 Pall Mall  
SW1Y 5NQ London, United Kingdom

## Brussels

53 Avenue des Arts  
1000 Brussels, Belgium

## Amsterdam

Parnassus Tower  
1076 AZ Amsterdam, Netherlands

## Frankfurt

Mainbuilding, Taunusanlage 15  
60325 Frankfurt am Main, Germany

## Hamburg

Neuer Wall 80  
20354 Hamburg, Germany

## Munich

Isartorplatz 1, 1. OG  
80331 Munich, Germany

## Cologne

Rudolfplatz 3  
50674 Cologne, Germany

## Zurich

Gerbergasse 5  
8001 Zurich, Switzerland

## Milan

New Deal Advisors  
Via Santa Maria Fulcorina, 2  
20123 Milan, Italy

## Madrid

C. de Jorge Juan 35  
28001 Madrid, Spain

## New York

Tower 49  
12 East 49th Street  
New York, NY 10017

## Mumbai

Urmi axis, Seventh floor, Famous Studioline,  
Mahalaxmi, Mumbai 400 011, India

## Annecy

4 Rue des Bouvières  
74940 Annecy

## Eight International

12 rue Jean Engling  
L-1466 Luxembourg

## FRP

110 Cannon Street  
London, EC4N 6EU, United Kingdom

## JP Weber

Ul. Wspólna 70  
00-687 Warsaw, Poland

## JP Weber

Grodzka 9  
50-137 Wrocław, Poland

## New Deal Advisors

Via Santa Maria Fulcorina  
2-20123 Milan, Italy

## McGrathNicol

Level 12, 44 Martin Place  
Sydney NSW 2000 Australia

## DH Advisory

Dubai World Trade Centre  
Dubai, UAE

## OWL

Biblioteksgatan 29  
114 35 Stockholm, Sweden

This publication contains general information only and Eight Advisory & Eight International is not, by means of this publication, rendering accounting, business, financial, investment, or other professional advice or services. This publication is not a substitute for such professional advice or services, nor should it be used as a basis for any decision or action that may affect your business. Before making any decision or taking any action that may affect your business, you should consult a qualified professional advisor. Eight Advisory and Eight International shall not be responsible for any loss sustained by any person who relies on this publication.

For media inquiries please e-mail: [marketing@8advisory.com](mailto:marketing@8advisory.com)

© Eight Advisory & Eight International, 2026. All rights reserved.

# EightAdvisory®