DIALOGUE by DESIGN

Department of Energy & Climate Change

# Energy Savings Opportunity Scheme

## Summary Report on the Roadshows

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# About the roadshows

DECC hosted a total of four roadshows in Durham, Bristol, Manchester and London during autumn 2014. Each roadshow featured a mix of presentations from speakers, panel discussions and table discussions; and in London a keynote speech from the Secretary of State for Energy and Climate Change, Edward Davey MP. The aims of the roadshows were to build awareness of ESOS and the benefits of going beyond compliance by implementing energy efficiency opportunities, and to gather feedback on the wider business energy efficiency policy landscape. You can see the list of speakers and attending organisations in Appendix 2: About the workshops.

## About this report

At each roadshow there were two half hour sessions where participants were asked to discuss in groups of eight to ten their views on ESOS, and the wider energy efficiency policy landscape. The discussions were recorded by participants on pro-forma which were collated and analysed to produce this report, supplemented with notes taken by the facilitators as they observed the table, panel and plenary discussions.

All of the data, once transcribed, was analysed by our team to produce the findings presented in this report. We took a thematic approach to analysis, categorising the workshop notes with a set of themes that described the ideas and views expressed in group discussions and plenary sessions. This report uses these themes to summarise the findings. We have made comparisons across the different locations, but as we did not record the contribution of each participant by name, we are not able to separate out the views of individual participants.

The sessions allowed us to explore the views of around 500 participants across the UK, but as the discussions were short, the feedback is mainly high level. The summary below follows the structure and content of these discussions, providing detail where it was available.

# All about ESOS

At each of the roadshows, Department for Energy and Climate Change (DECC) representatives offered an overview of the Energy Savings Opportunity Scheme (ESOS) and its requirements.

Across the four roadshow discussions there was a mix of reflection on ESOS as a policy instrument within a suite of energy policies, and more practical discussion of achieving compliance. At each roadshow, participants were given the opportunity to ask detailed questions about the scheme – a summary of these questions and their answers can be found in Appendix 1: Frequently Asked Questions.

## ESOS as a policy instrument

At each location the majority of participants felt broadly positive about ESOS; they recognized the value of regulation to move energy efficiency up the agenda for businesses and the need for policy to apply widely. The rationale that the costs of audit would be exceeded by the savings from implementation was generally acknowledged and supported, and the idea of mandating senior management involvement was recognized as helping to address one of the main barriers to implementing energy efficiency measures within businesses.

In every workshop there were a few participants who felt that ESOS would not benefit their business. These tended to fall into two categories; firstly those who believed they had already taken all financially viable steps to increase energy efficiency. From this first group of organisations, many of which fall under existing policies such as CRC, there was a concern that the costs of ESOS compliance could not be offset by further efficiency savings. DECC and the EA articulated clearly that ESOS was designed to ensure that these businesses could use existing good energy management practice to support compliance – however participants' concerns remained about how this will work in practice.

The second strand of concern about ESOS was from participants who felt that it would be technically difficult or prohibitively expensive to audit their business because of its profile; for example because of the proportion of energy used by a grey fleet or a large number of sites with different profiles. However, there was a feeling from some at the roadshows that these cases may actually benefit most from ESOS, as the policy prompts businesses to examine those aspects of their energy use which they might otherwise choose to ignore in favour of easier (but potentially less profitable) wins.

DECC describes ESOS as meeting (but not exceeding) the minimum requirements of the European Energy Efficiency Directive while minimising administrative burdens on business. The benefits of relying on market pressures vs more regulatory involvement in energy efficiency were debated at each of the roadshows, with no clear consensus emerging. For some participants energy efficiency was a logical path for business to pursue in order to reduce their costs and ultimately perform better economically. For these participants regulation to mandate efficiency measures was seen as unnecessary, although it should be noted that even among these participants ESOS was recognized as being a relatively pragmatic approach to fulfilling the requirements of the EU Directive.

In contrast there were a large number of participants who felt that the barriers which prevent organisations from implementing efficiency measures are sufficiently high that regulation is an appropriate and necessary response. At various points during the roadshows some participants suggested stronger regulation, to mandate the uptake of efficiency measures identified, to mandate compliance from sectors covered by ESOS such as landlords, or stronger enforcement of the regulations (although these proposals were certainly not supported by all participants).

In the implementation section below we summarise the round-table discussions on ESOS that participants engaged in at all four locations. We asked participants to address two sets of questions in these discussions, one set about their understanding of ESOS, and another about how their experiences with energy efficiency audits and measures to date could apply to ESOS.

## Questions about implementation

Participants often chose to use the roadshows as an opportunity to discuss with their peers the practicalities of the energy audits they will carry out under ESOS. This generated a host of questions for DECC and the Environment Agency (EA), which are included along with the answers in Appendix 1. This section gives a short summary of the questions participants raised in discussions of ESOS and, where available, links to the answers provided by DECC and the EA in the FAQ appendix.

**What are you unsure about with regards to implementing ESOS? What concerns do you have about the operation of the ESOS scheme?**

### What do the audits cover and how?

Across the events, many participants wanted clarity on precisely what would be covered by ESOS and what would not. For example, participants discussed whether transport energy usage needed to be included in the audit[1]; what the precise relationship between ESOS and ISO 50001 would be[2]; and what the process and timescale of the audit would be.

Recognising that ESOS is intended to allow the use of data already collected to support compliance with other schemes, participants often wanted more guidance on whether their existing data and energy audits would be sufficiently rigorous to meet ESOS's requirements[24]. Other participants wanted simple checklists or additional guidance on what constituted compliance. A few participants commented that additional guidance regarding survey requirements would also be particularly useful and some participants articulated a desire for audit templates to be produced by DECC/EA.

*'Lack of clarity on specific audit detail, we would like to see templates for the required outputs.'*

The requirement to consider the entire energy usage of an organisation and audit 90% was seen as a challenge by many participants. Participants in each location sought greater clarity about which 10% of their energy consumption should be left out. Others wanted to know what constituted 'significant energy usage'[25]. This often developed into a debate about the benefits of omitting the most difficult to improve areas of a business, versus using the ESOS audit as an opportunity to tackle an area that might have been neglected. It was clear that businesses would interpret the 90% rule in different ways depending on their level of engagement with energy efficiency measures. The application of the de minimis principle was another area of interest for some participants, with some specific cases where even assessing the scope of de minimis use was seen as a challenge.

Transport was identified by participants at each location as one of the areas where ESOS might prompt them to develop new methodologies and practices. Some participants were concerned that their current data collection on transport use would not be sufficient for the purposes of the audit[1].

Participants from larger enterprises often wanted to know what the requirements for multi-site implementation were[15]. For example, one participant noted that they had a large number of sites throughout England and Scotland and wanted to know what their audit requirements would be.

*'We have over 110 sites throughout England and Scotland; must we audit almost all of these sites?'*

DECC reassured participants in each location that a site visit sampling methodology was appropriate and participants should keep justification for their methodology in their evidence pack. DECC assured participants that all sites would not need to be visited to be able to claim that the audits met the minimum criteria for ESOS, but that site visit findings should be applied proportionately to similar assets/activities the organisation held or carried on. This was clearly important to many businesses with multiple sites, including those who were already subject to other regulations such as CRC in some areas of their business, but would need to expand their coverage under ESOS.

Others noted that it would be difficult for them to guarantee 12 months of data for newly acquired parts of their business. DECC highlighted that ESOS includes a 'comply or explain' approach to this requirement to allow for reasonable estimates to be made where actual data was unavailable.

## The audit process

On the practical side of ESOS, participants wanted to know how the submission platform would work, asking for advance notice of what would need to be completed so they could manage resources.[1] There was a related point from a number of participants who felt that the time between initial notification of ESOS's requirements and the first compliance deadline for ESOS was not sufficient.

While the multiple routes to compliance were welcomed by some participants, there were others who questioned how a consistent standard could be maintained given the multiple routes to meeting its requirements. Another concern from a few businesses was that those who already have extensive audit programmes in place, but which are not compliant with ESOS, would face administrative burdens to adapt their programmes to meet ESOS but may not achieve any additional benefit. This issue was a common theme across the locations, particularly from participants representing energy intensive sectors who were already subject to a number of schemes.

A number of participants commented on enforcement of ESOS, noting that they felt government schemes were not always enforced effectively, but businesses would be motivated if they faced stiff penalties for non-compliance[26]. A few participants believed that a fine of £50,000 was not sufficient to enforce compliance. On the flip side of penalties some participants wanted a public accreditation/kitemark scheme as part of ESOS, so that they could advertise their compliance to their customers and other stakeholders.

## Who qualifies for ESOS?

Participants discussed who would qualify for ESOS, with a particular focus on whether private companies owned by public authorities, charities, charitable trading arms or schools would be regulated[3,4,6]. Participants also wanted to know more about at what organisational 'level' audits would apply – for example, wanting to know whether they would be run by parent companies or by each subsidiary of a group and at what level the '90% rule' would apply. Others commented that implementation of ESOS may be tricky for multinational companies.

A small number of participants noted that tying eligibility to the number of employees an organisation could include labour-intensive companies that did not use a lot of energy. Finally a small number of participants felt that the initial letters sent out by the Environment Agency did not sufficiently clarify eligibility requirements.

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[1] You can access the ESOS notification system at: https://esos_notification.snapsurveys.com/siam/surveylanding/interviewer.asp. Click 'print' to print a copy of the full notification form and questions.

## Lead Assessors

A common topic of discussion among participants was the precise role of lead assessors and what qualifications these assessors would need, with some suggesting that the specification that assessors would have to meet should go beyond competency requirements and that the qualifications assessors had to attain should be rigorous and impartial. Others remarked that it was unclear how the work they had already done on energy audits would 'mesh' with an external assessor coming in and reviewing their work[18].

Some participants wanted to know what variability there would be in requirements applied to companies by different assessors, while others were concerned about what would happen if an organisation and an assessor had conflicting interpretations of guidelines[11]. A number of participants stressed the importance of finding assessors with industry specific knowledge. This was seen as particularly important for more complex industries, where energy use was tied in with industrial processes, but also for areas like transport where businesses felt they were less likely to have the relevant skills in house already. There were also general concerns about the availability of assessors to carry out the required audits by the ESOS deadline.[13,14]. DECC stressed the importance of companies commencing ESOS compliance early to ensure they were able to comply by the deadline. They also pointed out that a lot of compliance work could be done internally without significant technical knowledge and before appointing a lead assessor if they had not yet identified a suitable lead assessor to assist them (e.g. gathering data for the total energy consumption calculation, analysing the energy use and trying to identify anomalies).

## Scheme overlap

Participants thought that there was some overlap between ESOS and existing schemes, such as Climate Change Agreements (CCA) and CRC Energy Efficiency Scheme (CRC). These participants wondered how ESOS would be aligned with these schemes, noting (for example) that the CRC had a five year compliance period compared to four years for ESOS. Others wanted to know the extent to which a CCA could support compliance for ESOS[16]. There is more detail on participant's views of other energy schemes in section two, the wider policy landscape.  DECC noted that ESOS was designed to allow activity undertaken under these schemes to be used to support compliance with ESOS where there was overlap (e.g. around data collection).

## The policy and political context

A number of participants worried about the political context and long term stability of ESOS, expressing concern that future governments might remove the scheme, thus undermining the investment companies had put into compliance. As we discuss in greater detail under the wider policy section, the need for consistent requirements was a clear message from businesses to government, with participants arguing that the tendency for policy and regulations to shift according to political fortunes could be hugely damaging to the credibility of those trying to move reluctant organisations towards sustainability.

## What lessons have you learnt from implementing energy audits? What lessons have you learnt from implementing energy saving opportunities?

### Organisational lessons

Participants discussed a variety of lessons they had learnt from implementing energy audits and energy management systems so far. Some commented on the importance of behaviour change and emphasised that whole teams/business areas had to buy in to energy saving measures for them to be effective. A few participants reported the experience of very little follow up in their organisation after an energy audit, mostly due to other pressing issues and lack of resources set-aside for this purpose in their organisation.

Some participants worried about getting 'buy-in' to ESOS from within their own organisations, stating that those running the scheme would need to work hard to engage senior decision-makers in their companies, even with the requirement for director level approval of the audit. This was a point made by many participants, who reflected on the difficulty they had getting board level sign off on efficiency schemes, particularly where capital spend was involved.

Many participants noted the importance of 'payback' in getting their organisations engaged in energy audits. These participants often suggested that their organisations would need to see the financial rewards of reduced energy usage following the audit within a certain timeframe (such as six months) or they would be unlikely to realise the benefits.

> *'Some payback periods are too long. Immediate paybacks are more likely to get funding.'*

Some participants saw energy audits as providing the tools to implement continual improvements in energy efficiency. Others commented that their organisations had already exploited 'low hanging fruit' so these incremental changes were the only option for further energy reduction for them. These participants often suggested that the 'low hanging fruit' changes had brought large financial dividends.

> *'How do we maintain the momentum year on year – after the low hanging fruits have been picked?'*

When considering the measures they could take participants sometimes argued that it was important to take a 'leap of faith' with energy saving opportunities – to believe that following the recommendations from an energy audit actually would deliver savings and efficiencies. In contrast, some warned that savings outlined in reports often differed ‘wildly’ from real savings, suggesting that technology doesn’t always deliver on its promises.

> *‘Manufacturers figures for savings don’t always equate to reality – often only 75% of what they claim.’*

## Practical suggestions

A few participants made specific suggestions that they had found helped them reduce energy costs and lower carbon emissions rapidly. For example participants suggested reviewing procurement of electricity and gas, or offered advice about how to switch to renewable energy generation on site. Others warned that transport energy costs were often underestimated.

A few participants suggested that it was essential that regular updates and reports were provided within organisations, so that people could track the financial impact of following recommendations. Others agreed that quantitative data was pivotal to making the case.

> *‘You can’t manage what you don’t measure.’*

Others outlined that energy saving measures were always competing for finance with other interests within a firm, and that therefore winning over senior management was essential. Some were disappointed that more energy saving recommendations didn’t reach their company board or were not approved if they did.

# The wider policy landscape

As well as discussing ESOS, participants at each roadshow were asked to reflect in groups on how they saw the wider energy efficiency policy landscape. We asked three prompt questions, and cover the responses in turn in this chapter. In each case we've separated the internal factors businesses felt affected their response to energy efficiency policy, and the external factors which affected them. The key points from both an internal or external perspective are drawn out here, with a more detailed summary below.

### *Key internal factors*

- The need for *top management commitment*.
- A general *lack of internal skills and knowledge* around approaches to auditing, measuring and implementing energy efficiency measures.
- A perceived *lack of capital* for investment in energy efficiency measures.

Given the current climate in which Government appeared to have an appetite for less regulation, participants thought it was debatable whether government has a role in guiding or directing internal company issues. But their responses do indicate a need for government to be aware that business leadership and internal capacity is not necessarily in line with policy aspirations for enhanced energy efficiency. And suggest that it is incumbent on trade associations and umbrella organisations to provide the guidance and help that businesses need to realise the potential cost savings inherent in the application of energy efficiency audits and measures.

### *Key external factors*

- In all the workshops there was a call for *long term policy consistency.* Several participants highlighted how policy changes – e.g. to FIT incentives and the CRC – affected business planning and could act as a disincentive to business acting on energy efficiency.
- Despite the wider call for less regulation, many participants in the workshop called for *incentives* from government to help them realise the cost savings inherent in the application of energy efficiency measures. The suggestions for incentives included tax relief, league tables and mandatory implementation of audit recommendations with a short-term return on investment. In contrast, other participants suggested that businesses were driven to make energy efficiency savings regardless of regulation or policy, because it made sound business sense.
- There was a call for *simplification* of all energy efficiency policies; and several general ideas of how they might be simplified; including a single scheme which applied in differing degrees dependent on the size of business and its operations.
- Access to and quality *guidance* on measurement, monitoring, processes and benchmark tools for energy efficiency was also called for.

- Ongoing *engagement* between business, government and related stakeholders in policy developments and amendments. Many participants value opportunities for dialogue, as it develops relationships between businesses themselves; as well as with government.

## Summary of the discussions

### 1. What helps you to implement the range of energy efficiency policies you are subject to?

### Internal factors

#### *Senior management*

Participants felt that businesses with good support from their senior managers were much more confident in their ability to implement savings. This was particularly the case where energy efficiency was incorporated into the corporate strategy, which ensured it filtered out through the entire business model.

> *"Fact: its regulation and legal compliance and requirement for director sign off means it happens and is given priority from top level."*

#### *Internal capacity, skills and culture*

Participants often highlighted the availability of appropriate skills in the business as a barrier and flagged up the need for specialist assistance. Participants felt that to implement energy efficiency savings they need people who *"know what they are doing"*, who have the technical skills to accurately identify and report on the potential savings. While recognising that these skills were available externally, via consultants and contractors, businesses were often cautious about the quality of advice they would receive. Some cited examples of over-promising from energy consultants where businesses had invested in improvements that did not deliver the projected savings.

As well as making technical energy efficiency improvements (e.g. through installing more efficient equipment), participants argued that companies also need commitment from employees to enact behaviour change. Several of the business speakers at the roadshows highlighted changes in behaviour as offering significant efficiency savings. They emphasised that it was essential for a business to change the mind sets of energy users towards energy efficiency.

The culture of the company was also identified as key - is there an appetite for investment? For some participants this was the major hurdle to overcome but there were examples of policy helping make this shift, for example some argued that CRC had raised awareness of the need to reduce consumption.

### *Capital*

Availability of capital for investment was another issue which participants identified as supporting their efforts to implement savings. Presenters like the Green Investment Bank and local services like the Manchester Growth Company all offered information to businesses about the opportunities for funding at the roadshows. Understanding how to access funding is as important as its availability, and there was a range of knowledge among participants.

### *Cost*

For some participants the most important driver for energy efficiency was simply energy pricing. Where costs have been steadily increasing for businesses the case for energy efficiency is strengthened. Some highlighted that changes in roll over on business energy contracts was starting to have an impact, and promoting change.

## External factors

### *Incentives*

Participants across the roadshows identified a number of incentive programmes which they felt had helped them implement efficiency measures. They argued that "*well designed incentive schemes make it financially attractive"* for businesses to take action, as the FIT and RHI schemes had helped to incentivise renewable energy generation. Aside from straight forward payments to businesses other incentives suggested included tax relief on investments, making implementation mandatory for projects with short payback, naming and shaming non-compliant organisations, and a 0% rate of VAT on energy saving devices e.g. LED lights.

### *Cost*

One of the most common disagreements between participants at the roadshows was whether or not the fact that energy efficiency saves money for businesses is enough to promote efficient behaviour without policy intervention. Some participants highlighted how increasing energy costs were helping to drive efficiency, and argued that even if energy efficiency policies were scrapped businesses wouldn't stop making cost-effective decisions. They felt that energy efficiency was not driven by regulation; instead company targets and common sense drive energy efficiency. This was disputed by other participants, who felt that many businesses still have not addressed the issues and will not do so without direction from policy. For these participants regulation was seen to have a key role in getting energy efficiency onto the radar of organisations which are not engaging of their own accord.

## *Policy*

Participants at many tables pointed out how particular policies had created compliance and prompted action in different areas. For example -

**CRC and metering**: the requirements of the CRC scheme forced business to look critically at their metering and monitoring programmes. This had highlighted metering anomalies which could then be addressed and elevated interest in energy to the board level.

**CCA/CCL and procurement**: these schemes led to companies looking more carefully at procurement and the monitoring of utilities, and led some to set energy targets for divisions in companies.

In other cases participants reported that schemes had simply motivated them to reduce energy usage to avoid financial penalties, as with CRC and CCL.

## *Transparency and engagement*

The influence of other businesses and stakeholders was listed as a supporting factor in several different ways. Some participants felt that making energy efficiency competitive between businesses via league tables or publication of compliance lists promoted more action. However others disagreed with this approach and argued that those who chose not to act were not likely to be incentivized by this being made public.

In a similar vein some participants described how engagement with their external stakeholders including shareholders, customers and suppliers had helped to drive energy efficiency measures where there was an expectation that the business would be taking them. Participants also wanted government to engage in these conversations, and advocated continued consultation prior to implementation of policy revisions. At the regional level the Manchester Authority is helping organisations collaborate on energy efficiency; and suggested it would be good to empower bodies in other regions to fulfil a similar role.

## *Information and guidance*

When it came to implementing energy efficiency policy and regulations many participants felt that more guidance would be helpful. They saw the existence of a policy as a good motivator for action, but felt this could be lost if the burden of implementation was too high. Participants suggested that guidance needed to be publicised and accessible, and that the guidance should enable ease of implementation.

> *“The presence of policies raises awareness of the opportunities, but then the range, complexity and administrative burden can detract from the measures that are then actually implemented.”*

Specific suggestions for guidance included details on measurement, monitoring, processes and benchmark tools.

What hinders you in implementing the range of energy efficiency policies you are subject to?

## Internal factors

### *Senior management/internal capacity*

The most common issue participants identified as an impediment to implementing energy efficiency was a lack of buy-in at the board level. Participants argued that too often energy efficiency is a low priority for a lot of businesses and, where it is picked up, it's in a piecemeal fashion and not a strategic priority across the business. They also felt that there was often a lack of staff buy in and knowledge, which combined to create a lack of resource in house for energy managers looking to implement change.

> *"There is a degree of ignorance and a lack of knowledge regarding energy efficiency - even among big business"*

Many of those attending the events were managing energy on a day-to-day basis in their organisations but were not able to make the types of capital spend decisions energy efficiency sometimes requires. Participants felt that if boards included energy efficiency in their corporate strategy it would be easier for those working in energy management to get energy issues on the agenda, and for Directors to support them and promote a culture where staff engaged in efficiency programmes.

### *Capital investments/ costs*

Connected to the lack of strategic priority was the absence of internal capital and finance to implement energy efficiency measures. Some businesses reported that it wasn't clear where to access finance or how to make the business case for energy efficiency. Others felt there was a particular lack of access for mid-sized enterprises which did not qualify for large investment schemes, or the support available to SMEs.

### *Efficiency and growth*

Some participants felt that energy efficiency was sometimes seen to conflict with the growth of businesses, because of a focus on absolute energy usage rather than usage relative to production. Another hindrance cited to achieving energy efficiency was that advances in technologies can lead to increases in energy usage when businesses become more high-tech. However there were also many examples of participants who challenged this perception and argued that genuine energy efficiency would support growth by freeing up capital for other business needs.

## External factors

### *Incentives and taxation*

As described above some participants argued that incentives in policy were the best mechanism to promote greater uptake of energy efficiency. However many participants felt that there was a lack of the correct incentives in the energy efficiency sector, particularly in comparison to renewables generation, where they saw much greater incentivisation. Related to this some participants reported that their experience of other schemes made them cautious about incentives which they felt could be altered at short notice.

Participants weren't focused solely on financial incentives, they were also interested in other types of incentive, for example using a kite mark or stamp for ESOS was seen by some as an incentive.

The other side of the incentive coin is financial penalties, and there was a feeling among some participants that current energy efficiency policies were more of a tax on businesses than an opportunity for them. CRC was often given as an example of a policy where businesses felt it had become much less effective as a tool to drive changes in behaviour when the revenue recycling element was removed. This led to perceptions of CRC as motivated by revenue raising and not achieving energy efficiency goals.

### *Complexity: communication and administration*

> *"Mixed messages, continual policy changing and inconsistent communications"*

A common theme among participants was that the policy landscape is too complex, and is not communicated clearly to those struggling to comply with different schemes. Participants felt that there should be a key phrase or message used to promote policies. Simplicity was a concept many espoused, arguing that there were many complex policies which changed too often to enable businesses to make sound, long term decisions. Even where good guidance was issued, participants felt that that there was often a short amount of time between guidance being released and the deadlines to implement, which provided challenges for business planning.

Simplification of CRC was suggested as a good example of government taking action to reduce complexity. Participants also suggested the use of local or industry forums to collate research, lessons learnt etc. on policies to support businesses to comply and government to legislate smartly.

Some participants took the view that there was simply too much regulation in this area, and argued that it involved administrative burdens but with little or no real benefit to the business.

Others disagreed arguing that there were significant benefits. But there was a consensus view from all of the roadshows that a more streamlined and simplified approach would benefit business overall and could potentially improve energy efficiency uptake. Participants cited further complexity by raising the issue of a lack of consistency between other policies they are subject to e.g. Health and Safety. Another challenge was the different inclusion criteria for different policies, particularly for businesses which are subject to different regulations at different scales or even different sites. Finally a related concern was that the timeframes of various policies were all different, for example some argued that Phase 1 of ESOS and phase 2 of CRC should be aligned.

### *Energy efficiency and carbon reduction*

Another cited example of a lack of coordination in the policy landscape was between energy efficiency schemes and emission taxes, where participants felt there should be greater alignment. Using the EU ETS as an example, some argued that the scheme prioritised reduction in energy use (or financial penalties) but doesn't have a direct link with energy efficiency within the business.

### *Political and policy uncertainty*

Generally there was a view that the focus of policy simply changes too often; that Government has a short term strategy, which is mostly reactive and that they need to "*stick to something*". Participants gave a range of examples, from the changes in CRC and FITs, to the intention to review ESOS in 2016, only 1 year after implementation. They argued that this lack of stability presents challenges for businesses in making long term decisions. Some cited examples of schemes which had to be scrapped after policy shifts, and others felt that it undermined the ability of energy managers to convince boards of the benefits of action when the context could change rapidly.

## What does the policy landscape need to drive more energy efficiency?

### *Long term consistency*

Participants across all locations talked about how the policy landscape needed more certainty across time. They suggested, for example, that there should be" *cross party agreement"* on energy policy to ensure a "*more joined up approach across the energy efficiency landscape"*. A more radical suggestion was for government to appoint a cross-party energy minister for a period of "*10 years, whoever is in power*", to provide greater cohesion and consistency in policy. The result, they argued, would be:

> *"More confidence in commitment to policy and that they aren't going to change i.e. changes in government, position in EU".*

Some participants also said that they felt that contradictory policies hindered growth; citing the CRC as an example of the absence of long term clarity and stability. Some businesses went so far as to say that the CRC diverted money that could otherwise have been invested in energy efficiency.

There was also a call for simplicity, with several participants calling for one policy for all aspects of energy efficiency, including EPCs, DECs, CRC, and ESOS etc. This all-encompassing policy would be applied in a simple way to different business types.

> *"If you are a large employer you must do A B C D E, a medium employer you must do B C D E F, a public body you must do A C E F etc."*

Other policy suggestions included making a link between decarbonisation and energy efficiency; aligning policy across departments; and working to ensure a consistency across Europe (as many businesses are multi-national in terms of both operation and sales).

### *Incentives and finance*

A range of different ideas relating to incentives and finance were raised. As mentioned previously the revenue recycling aspect of CRC was often held up as an example of policy that genuinely motivated greater efforts from businesses to improve efficiency. Some also reported that the earlier form of CRC league tables was a good incentive to perform. It was also suggested that the CRC process could be simplified by being collected via utility companies.

On ESOS, several participants felt that it could benefit from including a financial benefit or driver, for example tax rebates for energy efficiency measures, or by penalising companies for not adopting the measures recommended in the ESOS audit.  Another suggestion was that the cost saving opportunities identified by ESOS could be encouraged by some mandatory reporting and incentives with financial reward. The idea of mandatory reporting was expanded by the idea that

> *"If each company had to report on all identified cost savings i.e. why the company decided not to implement savings, it may focus the financial decision makers to implement more initiatives identified".*

### *Operation of schemes*

Many participants identified the need for more technical assistance to guide implementation; that there should be an amalgamation of the various schemes reporting requirements and a simplified application process.

A few participants talked about mandating either the auditing standard - one idea was to mandate a requirement to gain the ISO 50001 standard - and/or a requirement to implement the audit findings. And that this would, more effectively, focus the board on the changes necessary to achieve energy efficiency.

### *Communications*

Several suggestions to improve communication between government and business were made, including making the potential opportunities public, to drive forward efficiencies and a list or register of noncompliant companies to incentivise uptake and increase transparency.

Going beyond explaining the legislative requirements was suggested by a number of participants. For example by involving trade associations; increasing the transparency over the range of energy efficiency measures, capital costs and pay back periods; guidance on what auditing actually means; and examples in various contexts. Connected to this was the need to demonstrate clearly how the cost of energy efficient solutions was less than the cost of not acting and for clearer information on funding for energy efficiency. Several participants advocated for government, as a non-commercial entity, to offer best practice advice by directing business to the organisations that can help them whilst communicating the legal requirements.

> *"Best practice needs to be promoted by government so that "dodgy" sales people are forced out of the market".*

For future initiatives participants said there should be more consultation and listening with key stakeholders and people on the ground, as "*this will help provide clarity on compliance and be more effective in implementing measures*". Participants also suggested that more notice be given when new initiatives are being developed, to give businesses more time to plan ahead.

### *Improvement and learning*

Participants were keen that government should learn lessons from phase one of the audit process to ensure a more robust process in phase two. Some suggested that this learning could be translated into benchmarking to provide clear data across the business community, to enable promotion of the real and actual benefits once launched.

Participants also felt that more education was needed on which technologies and efficiency measures were effective. There needed to be some verification of technologies, as businesses feel overwhelmed with companies selling "their" technologies and don't know which to trust or choose.

Participants also raised issues with ESOS assessors, saying that guidance was needed on the format and content of the survey findings for the business, as people beyond the lead assessors needed to learn about energy efficiency. Some felt that while businesses might have confidence in their lead assessor, once the audit is complete there's a need for someone in-house to support the business through implementation and assess results.

A need for behavioural change and education was also identified by many participants. Implementation needs to be driven by the board, making it a strategic priority. And a range of training throughout organisations including -

- Enhancing skills of internal workforces to enable them to help themselves.
- Help smaller qualifying organisations embed the learning from an audit.
- More outreach programmes like this one.

There was also support from participants for more impartial and independent advice and support, with verifiable data to back up consultancy.

# Appendix 1: ESOS Frequently Asked Questions

**Detailed guidance on ESOS can be found online at: https://www.gov.uk/energy-savings-opportunity-scheme-esos.**

This appendix provides responses to some frequently asked questions raised during the business energy efficiency roadshows.

### 1. What transport costs are included in ESOS?

A: Energy consumption from transport is included within the scope of ESOS.

This is required only where an organisation is supplied with the fuel, not a transportation service that includes an indirect payment for the fuel consumption – i.e. transport where the fuel is consumed by a third party under a contract (such as a freight service or train or flight ticket) is not in scope

Grey fleet – that is, travel by a company employee in their own vehicle or a company car where the cost is reimbursed by the company – is in scope of ESOS.

### 2. Under what circumstances does ISO 50001 constitute compliance with ESOS?

A: An ISO 50001 Energy Management System (certified by an approved certification body) covering all energy use is accepted as compliance with ESOS. However, the Environment Agency will need to be notified of your compliance. To be compliant, the Energy Management system must remain valid at the compliance date i.e. 5 December 2015.

Where the certified ISO 50001 only covers a proportion of total energy consumption, that proportion can be deemed compliant (again if the system remains valid on the compliance date). Additional work would therefore be required to achieve overall compliance.

### 3. What is the definition of 'public sector' for ESOS purposes?

A: Any organisation that is required to comply with Public Contracts Regulations 2006 or Public Contracts (Scotland) Regulations 2012. As either a specifically defined contracting authority or as an organisation which is a contracting authority by virtue of receiving a majority of its funding from public sources, being subject to management supervision by another contracting authority; or by more than half of the board of directors or members of which, or, in the case of a group of individuals, more than half of those individuals, are appointed by another contracting authority.

### 4. Are companies owned at 'arm's length' by public authorities eligible under ESOS?

A:

Any organisation that is required to comply with Public Contracts Regulations 2006 or Public Contracts (Scotland) Regulations 2012 is exempt. For an Arms Length Body, this will be determined by whether it is:

a. a specifically defined contracting authority
b. an organisation which is a contracting authority by virtue of receiving a majority of its funding from public sources, being subject to management supervision by another contracting authority; or
c. more than half of the board of directors or members of which, or, in the case of a group of individuals, more than half of those individuals, are appointed by another contracting authority

## 5. What are the criteria to determine a small or medium sized enterprise (SME) under ESOS?

A: Under ESOS, an organisation is considered an SME if it has fewer than 250 employees and has an annual turnover equal to or below 50 million euro and/or a balance sheet total/equal to or below 43 million euro.

Where a UK SME undertaking is part of a corporate group which has at least one UK large undertaking (i.e. an organisation which has over 250 employees or has an annual turnover above 50 million euro and/or a balance sheet total above 43 million euro then they will be required to participate in ESOS.

## 6. Does ESOS apply to joint ventures?

A: Yes, if a joint venture (i.e. one where no single party has overall control) is large enough to qualify for ESOS in its own right.

Where an organisation has multiple investing companies but one has a controlling interest in accordance with the criteria stated in Section 1162 of the Companies Act 2006, then that organisation will be deemed to be the subsidiary of the organisation with the control, and they will participate together if they qualify (unless the parent chooses to disaggregate the subsidiary).

## 7. If your staff numbers/turnover changes regularly, how is eligibility for ESOS calculated?

A: To be in scope for ESOS you must be a large undertaking i.e. you employ more than 250 employees or have fewer than 250 employees but have an annual turnover in excess of 50 million euro and a balance sheet in excess of 43 million euro.

In determining whether they meet the employee threshold, undertakings should add the total number of people they employed (including employees and other persons engaged in the business of the organisation, such as owner-managers and partners) in each of the months of the relevant accounting period (i.e. the period which the financial statements used to consider the financial thresholds relate to) and divide by the number of months in that period.

### 8. If an assessor approves your audit but the Environment Agency considers you non-compliant, who is liable for this non-compliance?

A: The Participant who is being assessed is liable for non-compliance. Although ESOS assessments must be conducted or reviewed by a qualified lead assessor i.e. energy professionals who belong to an approved register maintained by a professional body, it remains an organisation’s legal responsibility to ensure that all of its areas of significant energy consumption are audited.

### 9. How does ESOS apply to tenants in rented property?

A: Where a tenant is a large undertaking they are required to comply with ESOS. However, ESOS audits should only include recommendations which are within the operational control of the landlord or tenant to address.

### 10. How large should the sample size for audits be?

A: Audits must cover at least 90% of a participant’s total energy consumption. Participants must measure their total energy consumption including all energy used in buildings, industrial processes and transportation across a 12-month period as part of their ESOS Assessment. The ESOS regulations do not mandate a particular sample size for site visits. The number of site visits conducted should be sufficient to give the Lead Assessor confidence that the audit findings and recommendations for the participant will be complete, applicable and accurate. However, this will vary depending on the nature of the business and its activities.

### 11. How easy is it to change assessor during the audit process?

A: A lead assessor must review your ESOS assessment before it is submitted to the Environment Agency. There is no requirement that the lead assessor must be the same throughout your assessment process.

### 12. Will tools for measuring ‘payback’ be provided to companies?

A: Most businesses will have their own approaches for appraising investments. The ESOS regulations recommend the Life Cycle Costs Analysis (LCCA) approach to be used whenever practicable. The ESOS guidance includes an example of one approach to conducting life cycle cost analysis.

### 13. Will there be enough competent assessors to complete all required audits?

A: Businesses can appoint a suitably qualified internal energy manager to act as a lead assessor or use a qualified external lead assessor. There are currently 15 different registers which suitably competent energy professionals can apply to join to become a lead assessor. The number of lead assessors is increasing and at this stage we are confident demand will be met. However, we would encourage businesses to act now to identify and appoint a lead assessor in order to ensure that they have sufficient time to comply with the scheme and to help stimulate the market.

### 14. Are there enough training verification sessions for acquiring lead assessor status?

A: There are 15 different registers which lead assessors can apply to join. Each has its own application approach and we are confident that this provides a sufficient number of opportunities for individuals to acquire lead assessor status.

### 15. Does every site within a business need to be audited?

A: The decision on how many site visits to undertake as part of an audit should be agreed between the Lead Assessor and the participant. The number of site visits conducted should be sufficient to give the Lead Assessor a confidence that the audit findings and recommendations for the participant will be complete, applicable and accurate. However, this will vary depending on the nature of the business and its activities.

### 16. Does past energy saving work count towards ESOS?

A: ESOS has a flexible policy design aimed at minimising overlaps and regulatory burdens. Business can use information gathered under other schemes and are able to use previous auditing activity and energy management practice to support compliance. The energy data already collated as part of compliance with EU ETS, CCA and CRC can also be used, at least in part, for the purposes of determining total energy consumption as part of an ESOS Assessment.

### 17. Is a company’s supply chain included under ESOS?

A: No. Audits only cover a company (and its wider corporate group) though large undertakings which sit within a company’s supply chain, would qualify for ESOS in their own right.

### 18. Can organisations use an in-house lead assessor for the full audit process, or are they required to have an external assessor review the report?

A: A company can use an in-house lead assessor for the full audit process, provided that the final assessment is approved by at least two board level directors.

### 19. How does a company register if it has an ISO 50001 accreditation already?

A: Participants must notify the Environment Agency (the UK-wide scheme administrator) that they have complied with ESOS by 5 December 2015, for the first compliance period of the scheme. The ESOS notification system is already live and can be found here: https://esos_notification.snapsurveys.com/s.asp?k=141338882199&vno=v1_0

### 20. How does the qualification system work, with regards to turnover requirements?

A: Any undertaking that has 250 employees qualifies for ESOS.

In addition, ESOS is mandatory for large undertakings that have fewer than 250 employees, but has both an annual turnover exceeding €50m and a balance sheet exceeding €43m. In determining whether they meet the financial thresholds, undertakings should use their most recent annual financial statements ending on or before the qualification date. However if the company has grown or shrunk recently it should look at previous accounts to determine whether it qualifies as a large undertaking or not. The ESOS guidance provides more detail on assessing qualification for such organisations.

### 21. Is ESOS overseen by the Scottish Environment Protection Agency in Scotland?

A: The Environment Agency is the UK-wide Scheme Administrator for ESOS; it is also the regulator responsible for compliance in England. As the scheme administrator the Environment Agency is responsible for publication of guidance, communications, and provision of helpdesk support and collection of notifications of compliance throughout the UK on behalf of all the regulators. Scottish Environmental Protection Agency (SEPA), the Northern Ireland Environment Agency and Natural Resources Wales are responsible for regulating ESOS in their respective devolved regions, e.g. checking compliance and taking enforcement action where applicable. The Department of Energy and Climate Change is the regulator for ESOS in respect of offshore installations.

### 22. Are companies responsible for registering as eligible with the Environment Agency?

A: There is no requirement to ‘register’ when you qualify for ESOS. Participants must notify the Environment Agency (the UK-wide scheme administrator) that they have complied with ESOS by 5 December 2015, for the first compliance period of the scheme.

### 23. What energy sources are included for ESOS (e.g. electricity, gas, biofuel, solar)?

A: Under ESOS, energy consumption includes the consumption of all forms of energy products, combustible fuels, heat (excluding the participant's own waste heat), renewable energy, electricity, or any other form of energy.

### 24. Can the EA give more information about what type/level of energy data is required to constitute an audit?

A: ESOS is not prescriptive about the methodology that must be used for audits. Audits must use at least 12-months data (although departure from this rule is allowed where reasonably justifiable) and identify cost-effective energy efficiency opportunities. The potential benefit of opportunities must be assessed using a life cycle cost analysis approach whenever practicable.

There are a range of auditing methodologies that can be used, such as the EN16247 standard and ISO 50002, which set out a detailed methodology for conducting energy audits.

### 25. How should an organisation determine which 90% of the energy usage should be assessed, what are the conditions of this decision in relation to de minimis considerations?

A: Organisations have flexibility in how they determine the 90% that is assessed. For example, the 10% de minimis could be determined by excluding particular types of fuel, sites, activities, or subsidiaries from the audit.

### 26. What are the penalties for non-compliance? How will this be monitored and enforced?

A: The scheme compliance bodies are responsible for auditing and enforcing ESOS in their respective jurisdictions.

Environment Agency – England

Natural Resources Wales – Wales

Northern Ireland Environment Agency – Northern Ireland

Scottish Environment Protection Agency – Scotland; and

DECC Offshore – offshore participants located within the United Kingdom Continental Shelf. Participants who fail to comply with the scheme could be fined in the region of £5,000 to £90,000 for non-compliance, however penalties are subject to the nature of the non-compliance and are at the discretion of the regulators.

# Appendix 2: About the workshops

## List of speakers

| | **Durham** *22nd October, 80 participants* | **Bristol** *10th November, 150 participants* | **Manchester** *18th November, 120 participants* | **London** *26th November, 120 participants* |
|---|---|---|---|---|
| **Welcome** | Cllr Neil Foster, Durham County Council | Cllr Heather Goddard, South Gloucestershire Council | Prof Tim O'Brien, University of Manchester | Edward Davey, Secretary of State, DECC |
| **Business case studies** | Adam Black, Lanchester Wines and John Short, Nifco | Jes Rutter, JRP Solutions on behalf of Rolls Royce and James Tiernan, UNITE Students | Sam Nicholson, ENWORKS & Business Growth Hub and Todd Holden, Manchester Growth Company | Jes Rutter, JRP Solutions on behalf of Rolls-Royce |
| **ESOS** | Introduction to ESOS -Martin Adams, DECC | | | |
| | Round table discussions on ESOS | | | |
| | ESOS panel Q&A | | | |
| **Financing** | Financing for energy efficiency - Miles Alexander, Green Investment Bank | | | |
| **Local issues** | ERDF funding for the North East - Maggie Bosqanuet, NELEP and Sarah Tennison, TVU LEP | Local opportunities - Andrew Garrard, Bristol 2015 Amy Robinson, Low Carbon Southwest | Research and its role in supporting business - Professor Ian Cotton, University of Manchester | UK energy efficiency opportunity – Edward Davey, DECC Rhian Kelly, CBI Paul Ekins, UCL Institute for Sustainable Resources and UK Energy Research Centre |
| **Policy landscape** | The UK business energy efficiency policy landscape – Dr Philip Douglas, DECC | | | |
| | Roundtable and plenary discussions on UK energy efficiency policy | | | |

# List of organisations attending

**NB list compiled from event attendance sheet, may not include late arrivals etc.*

| Durham | Bristol | | Manchester | | London | | |
|---|---|---|---|---|---|---|---|
| Axion Energy Solutions | Abricon Limited | LV= | A2Fa | JD Sports | Abcam Plc | Conferderation of British Industry | Lucideon |
| BAE Systems | AECOM | Merlin Housing Society | Greater Manchester | JOHN SISK & SON | ABEC Ltd | Croner | M&G Real Estate |
| Banks Group | Air Liquide UK | Mitie | AA Projects | Jones | Aberdeen Asset Management | DECC | Major Energy Users Council |
| Big-Energy | Arup | ML | Affiliated Utilities Ltd. | Joule Consultants | ABF Plc | Deloitte | Maple Project Solutions |
| Bond Dickinson | Auditel | Monks & Crane | AJ Bell Ltd | JRP Solutions | action4energy | Department of Business Innovation and Skills | Marksman Consulting |
| DCC | BEMS Energy | Munster Energy | Allan Environmental | Long Clawson Dairy | Affinity Sutton | Department of Energy and Climate Change (DECC) | Marshall of Cambridge (Holdings) Ltd |
| Durham County Council | Bombardier Transportation | National trust | AO Retail Limited | Longhurst Group | Affinity Water | Dixons Carphone Group | Next |
| Durham University | Bristol 2015 | Newton Cost Management Ltd | Asda Stores | Maloney Associates | Andrew Cooper CPEC Ltd | DONG Energy | NG Bailey |
| Effective Energy | Bristol Airport | North Bristol SusCom | Auditel | Manchester Business Growth Hub | Association for the Conservation of Energy | DS Smith plc | Npower Ltd |
| eic The Energy Experts | Bristol Water | North Somerset Council | Axion Energy Solutions | Maple Projects Ltd | Atkins PLC | E.ON | NQA |
| Esh Group | Budget Pack Ltd | Orchard Energy | Bmes | Michelin Tyre PLC | Auditel | Economic Energy | NUS Consulting Group |
| Esterline | BuildDesk | Parkwood Consultancy Services Ltd | Bray | Muller Dairy | Auditel UK Ltd. | EDF Energy | Oil & Gas UK |
| Gener8 Green Ltd | Business West | Power Electrics | Briar Associates | Muller Wiseman | AWE | Edwards Ltd | PEPA |

| Durham | Bristol | | Manchester | | London | | |
|---|---|---|---|---|---|---|---|
| | | (Bristol) Limited | | | | | |
| Gentoo | Carbon Trust | Quidos Ltd. | Bruntwood | New Charter Housing Trust Ltd | AWE Alermaston plc | EEF, the Manufacturers Organisation | Pinewood Shepperton plc |
| GMG Renewables | Cgon Limited | radiodetection | BSL | New Economy | B&Q plc | Egger UK | Power Efficiency |
| GR Oil and Gas | CMR Ltd | RBS | Building Sustainability Ltd | North Lancs Training Group | Balfour Beatty | EIC | Quidos |
| Green Zone Surveys | co2balance | RR Donnelley GDS Ltd | Capita | Peel Ports Limited | BASF Plc | Eli Lilly | Ricardo-AEA |
| Greggs | CO2balance UK Ltd | Ryeden Environment | Chemquip ltd., | Plastic Omnium | Boots | Energise Ltd | RWE Generation |
| Groundwork | Cofely Ltd, part of GdF Suez | Solar Ready | Cheshire East Council | Premex Group | Bouygues ES | Energy & Utility Skills | Santia Consulting Ltd |
| Huntsman | Concern for Carbon Ltd | South Glos Council, Local Sustainable Transport Fund (LSTF) | Cofely | Price | BPIF | Energy and Emissions Solutions | SESW |
| Husqvarna Group | DAC Beachcroft LLP | South Gloucestershire Council | Contour Homes | Radius Systems | BRE | Energy Efficien:ology | Shanks Waste Management Limited |
| John N Dunn | DAS UK Group | Sparkle | Crioda International Plc | Redhall Group plc | British Beer & Pub Association | Energy Institute | SMMT |
| Johnson Matthey | DHL SUPPLY CHAIN | Stride Treglown | Cropwell Bishop Creamery | Renewable Planet | British Ceramic Confederation | Energy Managers Association | South West Water |
| Lanchester Wines | DST Output (Bristol) Ltd | Stroma Certification | Eastlands Homes | Riverside Energy Solutions Ltd | British Gas | Environment Agency | Southern Solar |
| Lucideon | Dudden Ltd | Sustain Ltd | ECA Group | Rochdale Boroughwide Housing | British Gypsum | EON community energy | Southern Water |
| NE LEP | Ecosurety | threeCCCs | Eco-Rich Ltd | Santia Consulting | British Polythene Industries PLC | Esso Petroleum Ltd | Sporta |
| NEPIC | EDF Energy | Trant Engineering ltd | Eddie Stobart | Seddon Construction Ltd | British Pump Manufacturers Association Ltd | ESTA | SRL Technical Services Ltd |

| Durham | Bristol | | Manchester | | London | | |
|---|---|---|---|---|---|---|---|
| New College Durham | EE | Triodos Bank | EIC - Utilitywise | Senator International | British Retail Consortium | Eurostar | Stroma |
| Newcastle University | Energy & Technical Services Ltd | Ty Mor Consultants Ltd | Elmhurst Energy | Shell UK | British Sugar plc | Eurovia | Strutt & Parker |
| NIFCO | Executive Energy | Uniq Solutions | Emerson Management Services Ltd | Skipton Building Society | BSI | ExxonMobil Chemical Limited | SuperGroup Plc |
| Nissan | GEO Specialty Chemicals UK | UNITE Group plc | ENER-G Combined Power | Solvay | Building Research Establishment | FCC Environment | Sustainable Property Assessments Ltd |
| Northern Gas Networks | GKN Aerospace | URS | Energy Gain UK Ltd | St Vincent's Housing | Bureau Veritas | Ford Motor Company Ltd. | Syntegra Consulting Ltd |
| Northumberland County Council | Gleeds | Vale Europe Ltd | Energy Team (UK) | STC Energy | Buro Happold Engineers | GAMBICA | TBPL |
| Northumbria Water | Honda of the UK Manufacturing Ltd | Wales & West Utilities Ltd | ENWORKS | Stroma | Byrne Group | GDF SUEZ | Tesco |
| Pepsico | Ian Williams Limited | Wessex Water | FirstGroup | Sustainable Commercial Solutions | Cancer Research UK | General Motors UK & Ireland Ltd | The Carbon Trust |
| SSI-Steel | ISS Facility Services | Wiltshire Council | Forticrete Ltd | SustainSuccess | Capita | Giraffe innovation | The Co-operative Group |
| Stroma | JRP Solutions | Wincanton | Future Homes | T2000 | Carbon credentials | GKN Driveline | TheGreenAge |
| Tadea | Kingfisher plc | Yeo Valley | GDF SUEZ Energy | TATA Chemicals Europe | Carbon Footprint Ltd | GLL | Tishman Speyer |
| TDJ | Lafarge Tarmac | | GMCA / Low carbon hub | The Co-operative Group | Carbon Saver Ltd | Great Portland Estates plc | Total Holdings UK Limited |
| Tees Valley Unlimited | Low Carbon South West | | GoldmineBD | Tyco Installation & Services UK & Ireland | Carillion Plc | Green Assessors | Travis Perkins |
| TeesActive | | | Green Energy | u b services | CBI | Green Element | Tuffin Ferraby Taylor |
| Teesside University | | | Green Technologies & Solutions | UK Greetings Ltd | CBRE | Green Investment Bank | UCL & UKERC |
| Union Electric & | | | Groundwork | University of | CEMEX UK | Greengage | UPS Ltd |

| Durham | Bristol | Manchester | | London | | |
|---|---|---|---|---|---|---|
| *Steel* | | | *Manchester* | | *Environmental LLP* | |
| *Unipres* | | *Halewood International* | *Urban Vision* | *Central YMCA* | *Hilson Moran* | *Upstream Sustainability Services* |
| *Utilitywise* | | *Heineken UK* | *URENCO ChemPlants* | *CH2M HILL* | *hurleypalmerflatt* | *Urban Vision* |
| *Ventumotors* | | *Hirst* | *Verco* | *Chemical Industries Association* | *ICF* | *UX Energy Services* |
| *Ward Hadaway* | | *Iceland Foods Ltd* | *Vickers Energy Group* | *Choice Discount Stores Limited* | *Independent Utilities Ltd* | *Veolia* |
| *Zero Carbon Futures* | | *INEOS ChlorVinyls* | *Vivergo Fuels* | *CHPA* | *ivees* | *Wartsila UK Limited* |
| *Zumtobel* | | *Insuletics Ltd* | *Wageningen University* | *CIBSE* | *Johnson Matthey* | *Willmott Dixon* |
| | | *Inteb Sustainability* | *Willmott Dixon Energy Services* | *CIGA* | *JRP Solutions* | *Wm Morrison Supermarkets PLC* |
| | | *Ivy Link Partnership* | *Xcite @ West Lothan Leisure* | *Clancy Docwra* | *LCEA Ltd* | *Wolseley UK* |
| | | | | *CMS* | *Legal & General Property* | *Wood Panel Industries Federation* |
| | | | | *Cofely UK* | *Lend Lease* | |