

LONDON BOROUGH OF BROMLEY
ENVIRONMENTAL SERVICES DEPARTMENT

CRC 2010/11 ANNUAL REPORT APPENDIX TO ES12005: CRC TRACKER
1 FEBRUARY 2012

DATE	LINK / SOURCE	DETAILS
24 Nov. 2011	EA Participant Update November 24, 2011	<p>Compliance Auditing: The EA have started to conduct Compliance Audits on Participants. Participants are audited using a risk based approach.</p> <p>Update on reporting errors: While LBB does not believe it was any reporting errors, other participants have found some. The EA doesn't intend to publish another Performance League Table for 2010/11 based on amended data. Any decision on whether or not to take enforcement action or issue civil penalties will be taken on a case by case basis.</p> <p>Keeping details up to date: Any amendments can be made in the 'Manage Contact Details' section in participant's our CRC Registry account. The EA state that "If your organisation has changed its structure, you may need to notify us of a Designated Change. You have up to 3 months to notify us of any change"</p>
8 Nov. 2011	2010/11 Performance League Table	<p>The CRC Performance League Table data for 2010/11 was published on 8 November 2011. Bromley ranks 584th out of 2,102 participants (8th best of the London boroughs) and here is our participant summary. However the Performance League Table no longer has the importance originally envisaged: it was to have been used for calculating organisations' financial reward/liabilities. Under the scheme as originally envisaged, LB Bromley, being almost top quartile, would have been a net financial beneficiary. Now the scheme is a straight tax the table has no financial bearing but could be considered a reputational risk.</p>
26 Oct. 2011	<p>EA Participant Update October 2011 Updated information on the <i>Performance League Table</i> (PLT)</p> <p>Preview the format for: PLT main table and participant scorecards.</p>	<ul style="list-style-type: none"> ▪ How the PLT is compiled and its contents can be downloaded here. ▪ The PLT 'main table' will show rankings & early action results: view the format here. ▪ What details the <i>participant scorecards</i> will show for each participant – view the format here. <p><i>NB The EA will send you a Participant Update in the next month to give advance notice of the publication date of the actual PLT and Participant Scorecards</i></p>
15 Aug. 2011	Review of Academies' participation in the CRC Energy Efficiency Scheme	<p>DECC has published a discussion paper on Academies' participation in the CRC</p> <p>Option 1: to retain the status quo. DfE is consulting on school funding reforms that might allow the cost of CRC allowances to be retained centrally before calculating budgets for both maintained schools and Academies.</p> <p>Options 2 and 3: to allow individual qualification and participation by schools (option 2 for all schools, option 3 for Academies only). These options look unlikely as they would result in a loss of emissions/income from the Scheme (few schools or Academies would qualify in their own right).</p>

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		Option 4: would see optional disaggregation of Academies, who would qualify through their LA but participate individually. The decision to disaggregate could be taken by the LA or the Academy, which could lead to some confusion. This option may be attractive for LAs but would be expensive for individual Academies, who would become liable for registration and subsistence fees and annual management / reporting costs as well as the cost of allowances.
9 Aug. 2011	CRC Admin Burden Survey	<p>Government has committed to simplifying the CRC Energy Efficiency Scheme. We are currently undertaking an informal dialogue with participants on changes and simplifications to the scheme for the second phase of CRC. The objective is to revisit the scheme to take into account the following context:</p> <ul style="list-style-type: none"> • The effectiveness of the CRC framework in driving energy efficiency in large public and private sector organisations in the light of wider policy developments in other areas • The perceived complexity of the CRC and hence the administrative burden on those organisations that are subject to the scheme and the administrators of the scheme. • Optimising the projected energy savings attributable to the CRC scheme. <p>As part of this process DECC have recently appointed KPMG's Climate Change team to assess the administrative time and costs placed on participants by the CRC. This will help inform the simplification of the scheme by helping us understand, using actual data, which areas of the CRC have taken the most time to comply with.</p>
1 Aug. 2011	EA Participant Update August 2011	<p>Please find attached information on:</p> <ul style="list-style-type: none"> • Updating your reports • Trading names on the PLT • Contact details for subsistence invoices • DECC questionnaire on CRC costs
15 July 2011	EA Participant Update July 2011	<ul style="list-style-type: none"> • Using estimated supplies • Reporting hints and tips • Updated Source List Tool • Registry access problems
30 June 2011	Simplifying the CRC Energy Efficiency Scheme: Next Steps	The CRC scheme is in serious need of simplification and this document summarises the various proposals. Other issues, such as paying for academies' carbon, will be the subject of further reviews.
29 June 2011	Participant Update: 27 June 2011	Important Tips: avoid these common errors when submitting reports
28 June 2011	Footprint and Annual Reporting Tips	Detailed tips on common errors made when participants are submitting reports. We are advised to read these tips before submitting our reports
28 June 2011	Ask the Experts - Guides on Reporting	Update of previous link - able to view offline now should you wish
2 June	Civil Penalties: failure to submit an annual	This guidance summarises the penalties associated with the failure to submit an annual report for

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2011	report for 2010/2011	2010/2011 and explains how the regulator in certain circumstances will be required to calculate your emissions. Please note that additional penalties relating to the blocking of your account and the number of allowances that you are required to surrender will also be relevant from 2011/12 onwards.
May 2011	Guidance on CRC EE Scheme: Annual Report Footprint Report	Revises February 2011 reporting guidance
5 May 2011	Reporting the CRC May 2011 (EA) Annual Report Screenshots and Worked Example - April 2011 (PDF, 1MB) Footprint Report Screenshots and Worked Example - April 2011 (PDF, 2MB)	From EA's May 2011 Participants Update: Annual and Footprint Report Screenshots <ul style="list-style-type: none"> ▪ Ask The Expert Film Guides on Reporting ▪ Tips on Reporting ▪ Keeping contact details up to date
5 May 2011	Expert Guides on Reporting (EA videos) Footprint Reports Annual Reports Evidence Packs Performance League Table (PLT) Time Managing Reporting Auditing	From EA's May 2011 Participants Update: <ul style="list-style-type: none"> ▪ Expert Guides on Reporting (videos) ▪ EA series of short film guides for easy reference on these key topics:
April 2011	Civil Penalties Guidance April 2011 (DECC)	This document is designed to provide guidance to the Environment Agency, the Scottish Environment Protection Agency and the Chief Inspector (Northern Ireland Environment Agency) as the administrator of the Scheme on the imposition of civil penalties under the CRC Energy Efficiency Scheme Order 2010
April 2011	LEP / CIPFA Finance Guide April 2011	LEP Module 3: CRC Finance Guide written by CIPFA Financial and accounting aspects include: <ul style="list-style-type: none"> ▪ Understanding and managing scheme costs ▪ Analysis of data and its associated cost, including scenario planning ▪ Accounting for allowances and CRC emissions payments ▪ The allocation of scheme costs including implications for schools and PFI providers ▪ Buying, holding and selling allowances, with increased carbon trading likely in capped phases ▪ Assessing the risk of potential fines ▪ Assurance in respect of data and annual CRC reports and implications for internal audit ▪ Energy efficiency project investment appraisal ▪ The scheme will require careful financial planning and control in order to ensure compliance and manage scheme costs. It will also require finance staff to develop skills and knowledge in respect of buying and selling carbon allowances, accounting for carbon and cost allocation. ▪ Longer term, an increasing cost of energy and carbon combined with an increased focus on achieving efficiencies and savings could influence property maintenance and management decisions. This could, for example, affect future tenancy contracts in terms of the ability to recover the cost of carbon from tenants.

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		<ul style="list-style-type: none"> There is also assurance to consider in respect of reporting as well as the use of appropriate investment appraisal techniques when undertaking energy efficiency project appraisals.
March 2011	The CRC Scheme: Guide To The Legal Issues (LEP / Eversheds) Module 3: 'CRC Energy Efficiency Scheme – A Local Authority Guide to managing carbon, finance and legal issues'	LEP Module 3: CRC Legal Guide written by Eversheds This legal guide has been produced by Eversheds LLP, in conjunction with Stephen Cirell Consultancy Ltd, and is the first attempt to draw together all of the various legal issues relating to the CRC Energy Efficiency Scheme into a single guide. It seeks to consider the full range of legal issues that will arise in relation to this important statutory regime, not just the precise terms of the CRC Energy Efficiency Scheme Order 2010 itself. Whilst the Order requires any qualifying local authority to take certain steps, for instance the production of a footprint report, we look more widely at the requirement for an authority to have a strategy in relation to its carbon emissions work and for that to be lawful and based on sufficiently robust decisions from members. We look at the wider legal duties, such as those requiring Councils not to act unlawfully nor to sanction unlawful expenditure, and where personal liability might arise.
21 Mar 2011	March 2011 Participant Update (EA) Guidance notes on: Annual Report Footprint Report Meters and Metering CRC Evidence Pack and Source list summary CRC Compliance Auditing Overview , CRC Primary Evidence	March 2011 Participant Update Guidance notes on: <ul style="list-style-type: none"> Annual Report Footprint Report Meters and Metering CRC Evidence Pack and Source list summary CRC Compliance Auditing Overview, CRC Primary Evidence
28 Feb 2011	London Energy Project (LEP) Managing the CRC Energy Efficiency Scheme: A Local Authority Guide to Managing the Introductory Phase	This guide and toolkit follows on from the earlier volume, Preparing for the CRC Energy Efficiency Scheme and uses a similar approach to explain key aspects of the scheme. It is your route map to dealing with the CRC efficiently and will enable you to plan what you must do, help you to check that you have done it, hopefully answer the majority of your questions and help you to avoid the pitfalls.
28 Feb 2011	London Energy Project (LEP) Footprint and Annual Report Demonstration Tool	This Excel based tool provides an interactive way of demonstrating how a CRC footprint is calculated and how data is collated and provided for annual reporting. The tool is preloaded with sample data from an actual borough to give you an idea of what the collated data should look like. However, if you do not have data tools of your own or software add-ons to your energy management system, you can load your own data for analysis. The file will open on an instruction sheet explaining how to use and operate the tool. Sample Residual Measurement Lists are also included
28 Feb 2011	London Energy Project (LEP) Data Analysis and Forecast Demonstration Tool	The second Excel tool is intended to give a practical demonstration of some of the data analysis and forecasting techniques explained in the Guide. Once again the tool is preloaded with sample data from an actual borough. However, on this occasion you cannot amend or add your own data; this is intended purely so that you can see different techniques in practice and decide which ones best suit your circumstances, i.e. expertise, access to data and time! The tool is interactive and full instructions are provided on opening the file

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28 Feb 2011	London Energy Project (LEP) <ul style="list-style-type: none"> • Schools draft letter of authority • Supplier draft letter requesting annual statement 	<p>Template letters</p> <p>Two sample letters are included.</p> <p>The first is a sample letter of authority for you or other party to issue to energy supplier(s) on behalf of a school or other organisation.</p> <p>The second is a sample letter requesting an annual statement from your energy supplier. Don't forget the absolute deadline for this is 31st March 2011.</p>
28 Feb 2011	London Energy Project (LEP) <ul style="list-style-type: none"> • Chief Officer and Member CRC update • Schools presentation 	<p>Two PowerPoint presentations are provided to explain the key issues to internal and external stakeholders. These are unformatted so that you can easily add additional content and use your own corporate template.</p>
9 Feb 2011	The CRC Energy Efficiency Scheme (Amendment) Order 2011	<p>This Order is primarily being introduced to postpone the second phase of the CRC and to action initial simplification measures to the scheme. Government is also taking the opportunity presented by the instrument to update reference errors and action technical fixes from the CRC Energy Efficiency Scheme Order 2010.</p>
2 Feb 2011	<p>New consultation: Government seeks views on how to simplify the CRC</p> <p>Respond by 11 March 2011 to crc@decc.gsi.gov.uk</p>	<p>Feedback to date has led DECC to conclude that priority areas for simplification include:</p> <ul style="list-style-type: none"> • Private (business) sector organisational rules of the CRC Energy Efficiency Scheme [filetype:pdf filesize: 82.32Kb](PDF 82Kb) • Review of the CRC supply rules [filetype:pdf filesize: 73.82Kb] (PDF, 76Kb) • Review of the CRC qualification criteria [filetype:pdf filesize: 55.9Kb] (PDF, 62Kb) • Reducing the overlap between schemes [filetype:pdf filesize: 61.6Kb] (PDF 62Kb) (especially between the CRC scheme, Climate Change Agreements and the EU Emissions Trading System) • Timing and frequency of allowances sales in the CRC Energy Efficiency Scheme from 2012 onwards [filetype:pdf filesize: 56.41Kb] (PDF, 68Kb) • Timing and frequency of allowances sales in the CRC Energy Efficiency Scheme from 2012 onwards: Annex A - Timeline [filetype:pdf filesize: 98.3Kb] (PDF, 98Kb) <p>Views are sought on how these aspects of the CRC scheme could be simplified.</p>