

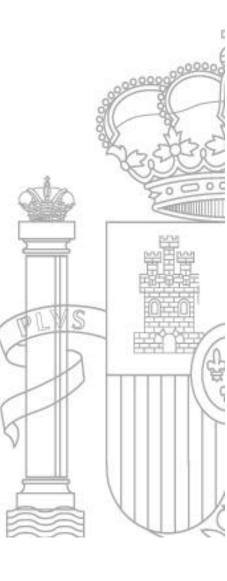
MINISTERIO PARA LA TRANSICIÓN ECOLÓGICA

# ENERGY AUDITS.

# Issues regarding implementation of Art 8.

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## Definition of non-SME, Multinationals.

- > Can a company certainly know whether is a SME or a Large enterprise?
  - Guidance Note and App on the website of the Ministry of Industry, Trade and Tourism.
    - <u>https://soypyme.ipyme.org/Home</u>
  - Related enterprises in other countries (including outside the EU) need to be included.

#### > Main problem inherent to non-SME definition.

- Multinational companies must audit all sites, even if it is a small delegation with a negligible energy consumption.
  (1) Costs can be higher; cost-effectiveness is an issue.
  (2) Difficulties to verify the correct implementation of the obligation.
- Suggestion: limit the scope, e.g. some criteria within MS.



### Flexibilities for multisite companies (not necessarily multinationals).

- Energy audits need to be proportionate and sufficiently representative to permit the drawing of a reliable picture of overall energy performance and the reliable identification of the most significant opportunities for improvement:
  - **Sampling:** Similar assets in different sites can perform a model of energy audit on a representative sample, and extrapolate results.
  - **Reporting:** Information can be registered in an aggregated manner form in each region.
  - **De minimis:** Energy audit must cover at least 85% of final energy consumption of the facilities within national territory.





## Verifying the implementation of the obligation.

#### > Who is in charge of the supervision?

- Autonomous Communities have the constitutional competence and are responsible for verifying the correct implementation of the energy audits.
- Good knowledge of the companies within their territory.
  - Difficulties with small delegations of multinationals.

#### > What does the Ministry for the Ecological Transition do?

- Coordination: meetings for exchange of good practices.
- Follow-up: Autonomous Communities report on the number and outcome of their controls.
- Assistance, if requested by the Autonomous Communities.
  - All companies participating in commercial activities must be registered at the Spanish Mercantile Registry.
  - Public register. All information may be accessed.
  - Several data mining systems available, e.g., SABI, DUNS

