Energy management system manual

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Energy management system manual

Amendments log

<table>
<thead>
<tr>
<th>Date</th>
<th>Version</th>
<th>Change</th>
<th>Reason for change</th>
<th>Change made by</th>
<th>Authorised by</th>
</tr>
</thead>
<tbody>
<tr>
<td>170915</td>
<td>v1</td>
<td>Creation of document.</td>
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<td>Alan Richardson</td>
</tr>
<tr>
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<td>v1</td>
<td>Update of policy and inclusion of responsibilities for all staff.</td>
<td>Pre-assessment for ISO50001.</td>
<td>Rosie Green</td>
<td>Alan Richardson</td>
</tr>
<tr>
<td>180416</td>
<td>v1</td>
<td>Removal of ROM role and redistribution of responsibilities.</td>
<td>Restructure to RCD structure.</td>
<td>Rosie Green</td>
<td>Alan Richardson</td>
</tr>
</tbody>
</table>

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Contents

1. Foreword
2. Policy
3. Energy management system model
4. Organisational chart
5. Responsibilities
6. Legal and other responsibilities
7. Objectives and programme(s)
8. Competence, training and awareness
9. Communication, participation and consultation
10. Operational control
11. Operational Considerations
12. Preventive action
13. Corrective action
14. Internal audit
15. Management review

1. Forward

Intu Properties plc. ("Intu"), through its Senior Management Board, is committed to providing good energy management and protecting our environment; this includes good communication and the provision of quality information.

Scope:

The provision of energy used by intu, including MSL and intu Retail Services, inclusive of malls, service areas, car parks, management offices and supplied or empty units. Tenant units with their own private energy supplies are excluded from scope.

Our process and procedures will cover all of the above.
2. Policy

The intu Environmental Policy states:

“A responsible and forward-looking approach to environmental issues is an important factor in intu Shopping Centres’ continuing success in the UK property industry. We recognise the mutual benefits of incorporating sustainability into our business strategies and of dealing appropriately with any impact on the environment caused by our operations”.

intu is committed to reducing its energy use and its impact on climate change and whilst energy forms part of our environmental policy, it is such a significant part of our environmental performance this document addresses intu’s energy commitments specifically.

intu are committed to:

- Have a representative at Operational Board level with responsibility for driving energy related issues.
- Regularly conduct group energy management meetings involving senior management.
- Reduce like for like carbon emissions by 50% by 2020 with 2010 base line whilst endeavouring to improve customer experience and maintaining good estate management.
- Maintain our Carbon Trust Standard Accreditation.
- Implement energy awareness training for staff at all levels.
- Publish our year on year energy performance.
- Increase energy awareness of staff, retailers and customers.
- Identify and support ‘energy managers’ at all of our sites.
- Utilise smart metering.
- Aspire to real time metering/monitoring of our energy consumption.
- Consider the lifecycle energy/environmental implications of equipment replacement and acquisition of new equipment.
- Provide resources and information to achieve our energy objectives and targets.
- Comply with all energy related legislation

These policy commitments are supported by clear objectives and we aim to deliver continual improvement in environmental performance. We conduct regular monitoring of our energy performance.

This policy forms part of our overall policy on Corporate Responsibility and as such is committed to communicating our Energy performance on an annual basis externally and internally. The company strives continuously to improve its performance. Management systems and procedures are regularly reviewed to ensure that the company maintains its commitment to this policy.

Signed: Matthew Roberts – Chief Financial Officer
Date: 18/04/16

Signed: Alan Richardson – Head of Energy and Sustainability
Date: 18/04/16
3. Energy management system model

General requirements

Intu (the organisation) and its Management Team are committed to implementing an Energy Management System, ensuring that the system will be maintained and continually reviewed.

Processes

The Energy Management System will identify the processes necessary to ensure compliance with the statutory requirements and good energy management; this will include management activity, provision of resources, service realisation and measurement.

Sequence and interaction of processes

The sequence and interaction of the sections within the Energy Management System are identified in the model of the process approach.

Planning

Intu acknowledges that effective management of Energy requires continuous planning as part of on-going business activities.

Any new activities require specific planning for Energy. Such planning includes identifying energy lifecycle implications and planning to reduce or remove them.

Implementation and operation

The organisation identifies within its Energy Policy, the criteria and methods to ensure effective planning, operation and control of the processes to minimise our energy consumption; this includes training, procedures and auditing against both procedures and the standard. This is assisted through the implementation of the energy procedures that Intu has developed, in helping managers manage energy effectively.

All employees have a responsibility for the implementation of the energy processes and the specific arrangements relating to the people and processes under their control.

Energy Management processes/arrangements must be clear, well designed; and take into account existing business practices. They must be documented, communicated and understood by all concerned. Above all, no employee should be left in any doubt, as to the importance of following agreed systems and arrangements.

The Intu Energy Policy states the commitment to energy and the environment. Therefore, energy issues will be treated as a matter of priority throughout the organisation.

Control

Intu will ensure that an appropriate degree of control is exerted over all workplaces through the provision of management who understand their responsibilities.

The organisation identifies within its Energy Policy, the criteria and methods to ensure effective planning, operation and control of the processes, includes training, procedures and auditing against both procedures and the standard.

Monitoring of processes

To ensure effective achievement of the requirements of the standard, the organisation will ensure that sufficient resources are made available to support the operation and monitoring of the process.

Analysis and continual improvement of processes

The organisation will implement actions necessary to achieve planned results, and the continual improvement of the Energy Policy.
The fundamental and basic principle of the Energy Management System and continuous improvement can be summarised in the following diagram of Plan-Do-Check Act:

Figure taken from BS EN ISO 50001:2011 Energy Management System.

**Plan**
- Policy
- Energy objectives
- Establish Baseline
- Establish key performance indicators (KPIs)
- Legal requirements
- Opportunity identification/Action Plans
- Targets
- Responsibilities
- Resources

**Check**
- Performance checking and monitoring
- Internal audit
- External audit
- Report

**Act**
- Actions to improve energy performance
- Actions to meet KPIs
- Data analysis
- Management review

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The authorised manual is contained on the system, if printed out, this is an uncontrolled copy.
4. Organisation chart

The Energy Management responsibilities of intu are devolved according to the management organisation chart below, with each Director being responsible and accountable for ensuring the effective planning and implementation of Energy Management Systems, and arrangements for their department to comply with the intu Energy Policy.

5. Responsibilities

Roles and responsibilities

Full details of the general Energy Management responsibilities and competency requirements of all Intu personnel are included in their job specifications/description.

The key management responsibilities are outlined below:

Group Chief Executive

- Is responsible for providing, strategic leadership, direction and oversight when setting the policy for delivering effective performance in energy management.

Chief Financial Officer

In addition to the other responsibilities specified in this part of the policy, the Chief Financial Officer:

- Has overall responsibility for ensuring that the Intu Energy Management Policy is updated, fully operational, sufficiently funded and that energy management responsibilities are appropriately delegated throughout the business;
- Shall annually review and report on energy management performance and establish plans that reflect current priorities;
- Shall ensure that Management Systems provide for effective monitoring and reporting of energy performance;
- Shall be kept informed of any significant energy management issues;
- Shall ensure that the energy implications of all executive decisions are addressed;
- Shall ensure that Energy Management Systems are in place and remain effective.
Group Operations Director – Intu Properties

- Is responsible to the Chief Financial Officer for ensuring that senior managers have implemented, and are compliant with Group Energy Management Systems.
- To be the “point of escalation” for handling Energy Management issues that arise at any of the properties.
- Will also ensure that the Intu Energy Management Policy and the associated management systems and arrangements are implemented, and maintained throughout the shopping centres.
- The Operations Director also has a specific responsibility sitting on the Corporate Responsibility Management Committee, CARG (carbon alternatives review group), and for communicating matters as necessary to the Management Executive and the Board of Intu.

Directors

In addition to the other responsibilities specified in this part of the policy, Directors:

- Shall ensure that their actions and decisions always reinforce the aims and objectives of the Energy Management Policy;
- Shall be responsible for the application of this policy in respect of their role as individual managers, and the functions for which they have specific control;
- Shall ensure that responsibilities for energy management are properly assigned, accepted and understood at all levels of their Directorate;
- Shall monitor and measure the energy performance of their managers against the requirements of the Annual Energy Action Plan, and through the appraisal process.
- When preparing annual budgets, identify and allocate adequate resources for ensuring the effective implementation of this policy, and to address the requirements of the Energy Policy are responsible to the Chairman, for ensuring the effective planning and implementation of the Group Energy Policy, with respect to their business area and activities and for delegating energy management responsibilities appropriately.

This includes ensuring that appropriate management arrangements, systems, procedures and resources are in place.

Head of Energy and Sustainability

- Reporting to the Technical Services Director, the Head of Energy and Sustainability has group-wide responsibility for the strategic development and implementation of the Energy Management and Environmental Management Systems relating to energy, and responsibilities include; developing a strategy to ensure the implementation of the Energy Policy.
- Monitoring of the Energy Policy and its implementation and communicating policy on all energy matters;
- The periodic inspections and auditing of energy policies and processes and reports on findings.
- Collating and tracking group-wide energy performance
- Assisting with energy action plans
- Consulting with Directors and nominated energy advisers on all issues of energy management.
- Identifying any training needs relating to energy, within the organisation.
- Fulfilling the duties of the ‘competent person’ and providing professional advice, or advising when specialist consultants may be required.
- Co-ordinating energy management activity for Intu.
- Ensure that the Board and Management are advised of impending changes to and consequent implications of Energy Legislation, Directives, approved Codes of Practice or Official Guidance and a continued commitment to continuous improvement, in the Management System for Energy.
- Ensuring adequate personal knowledge and understanding of energy matters and arranging formal training as required.
Energy Manager

Reporting to the Head of Energy and Sustainability, the Energy Managers are responsible for:
- Ensuring that the regional centres are advised of impending changes to, and consequent implications of, Energy Legislation, Directives, approved Codes of Practice or official guidance;
- Co-ordinating all energy management activity at all locations;
- Ensuring that Energy meetings are held at suitable frequencies;
- Assisting in production of action plans;
- Periodic inspections and audits of the businesses, energy policies and processes;
- Managing and reviewing the Group Information Exchange System;
- Ensure that arrangements are in place for all Intu staff to receive the Energy Induction Training, in accordance with the guidelines within the Energy Management Manual;
- Assist managers and staff to identify energy management training needs;
- Assist in the development of training materials and deliver training where appropriate;
- Ensuring adequate personal knowledge, and understanding of energy matters, and arranging formal training as required, and working with the Regional Centre Directors to deliver a proactive, world class energy management culture.
- To consider energy efficiency on any replacement equipment.

Chief Engineer

Reporting to the Technical Services Director, the Chief Engineer has responsibility for:
- Managing the Technical Services Team across all centres, to ensure compliance with all aspects of Energy Management and Audit requirements.
- Working with the Regional Centre Directors, delivering a pro-active world-class energy management culture, lead on technical operations, specialist support, standards, audit and compliance, setting technical objectives at all levels of maintenance, and project management.
- Ensuring statutory maintenance, testing and inspection regimes are in place and adhered to in compliance, with energy policy relating to Technical Services activities and their lifecycle implications.
- Providing expert knowledge relating to activities undertaken by the Technical Services Teams, and implications for energy.
- To consider energy efficiency on any replacement equipment.

Regional Centre Directors

Reporting to the Operations Director, the Regional Directors are responsible for:
- Ensuring that Senior Managers have implemented and are compliant with Energy Management Systems, and to be the “point of escalation” for handling energy management issues, that arise at any of the properties.
- Implementing the requirements of the intu Energy Management policy and procedures within the Operational Teams at the centres, and taking action where non-compliance is identified.
- Ensuring that line managers have received adequate energy management training to enable them to fulfil their responsibilities.
- Reviewing energy performance with the Group Energy Management Team and establish plans that reflect current priorities.
- Ensuring that the energy implications of all executive decisions are addressed.
- Ensuring adequate personal knowledge and understanding of energy management matters and arranging formal training as required.

intu Experiences

intu Experiences provide the commercialisation activities within the mall space at intu centres, and good co-operation and communication is required, to ensure that activities within centres comply with the energy policy and requirements, particularly in relation to use of landlord energy and its measurement.

Commercialisation Co-ordinators are responsible that the promotions and events they book operate in accordance with Intu’s requirements regarding energy management.

Commercialisation Co-ordinators should ensure that there is effective communication and co-operation with the Operational Teams on site, to ensure that all events promotions are planned and operate in accordance with energy management policy.
Marketing

Centre Marketing Managers are responsible for the marketing and public relations activities at intu centres, ranging from external advertising to internal promotional activity, to enhance the appeal and attractiveness of the centre to visitors. Close co-operation and communication is required to ensure activities within centres comply with energy management requirements.

Marketing Managers are responsible for checking that the promotions and events they book, operate in accordance with Intu’s requirements regarding energy management.

Marketing Managers should ensure that there is effective communication and co-operation with the Operational Team on site, to ensure that all events promotions are planned and operate in accordance with energy management policy.

Asset and property

Regional Directors and Asset Managers are responsible for the leasing of retail and commercial units within the shopping centres; leases require tenants to meet their statutory requirements. Regional Directors and Asset Managers are responsible for making tenants aware of Intu’s energy management requirements, prior to commencement of the lease, particularly if tenant is (temporarily or permanently) on a landlord energy supply.

Property Managers are responsible for the on-going relationship with tenants of Intu once the lease has been agreed. Property Managers are responsible for ensuring that tenants have been given information for Intu’s requirements in relation to energy management; in unit design, shop-fitting and their on-going operation. Property Managers are the point of escalation for energy management issues that cannot be resolved at a centre level.

Construction and development

Construction and Development are responsible for all major developments at Intu’s shopping centres. The Construction Director is responsible for ensuring that energy management is considered on construction and development projects. Close co-operation and communication is required between the Construction and Development Team and the Centre Management Team and Central Energy Management team, during all phases of a construction or development project, to ensure that energy management is considered and that any issues or concerns are effectively escalated and addressed.

Corporate Responsibility Management Committee

Intu Corporate Responsibility Management Committee meet quarterly to review the Energy, waste and corporate responsibility performance of the Group. This executive committee consists of the following personnel:

- Director of Corporate Responsibility – Chair.
- Construction and Development Director.
- intu Retail Services Managing Director.
- Intu Human Resources Director.
- Head of Energy and Sustainability.
- A General Manager to represent General Management of Shopping Centres
- Operations Director.
- Representative from Property department.
- Head of Internal Audit.
- Communications Director.
- Community Development Manager.
- Corporate Responsibility Manager.

Carbon Alternatives Review Group (CARG)

CARG Committee meet bi annually to review the Energy and Waste Strategy of the Group. This executive committee consists of the following personnel:

- Head of Energy and Sustainability – Chair.
- Director of Corporate Responsibility.
- Construction and Development Director.
- intu Retail Services Managing Director.
- intu Retail Services Technical Services Director.
- Operations Director.
- Chief Engineer
- Corporate Responsibility Manager.
- Representative from Operations Managers.
Roles and responsibilities of centre based employees

General Managers

The centre General Manager, in conjunction with the Operations Manager and Technical Services Manager, is responsible for ensuring that, the day-to-day energy management of the property under his/her control, are being carried out, according to the policy laid down by the Group.

This will include ensuring that all appropriate local Management Systems and arrangements are in place and that all employees are sufficiently aware of energy management implications of the tasks they are required to undertake.

The managers may delegate duties as appropriate to key employees, consultants, and contractors where they are competent to undertake them, but, will retain overall accountability for ensuring that energy management is considered in the day to day shopping centre operation.

In addition, the centre General Managers, in conjunction with the centre Operations, Technical and Energy Manager, will:

Assist in the development of policies, arrangements, required to secure legislative compliance and, as a result of these changes;

- Monitor compliance with energy legislation;
- Advise on corporate/site-specific training needs, and ensure that those responsible for providing energy management assistance to management are competent through adequate training;
- Promote a positive energy management culture within the organisation;
- Disseminate and effectively communicate any energy management information;
- Assist in the process of carrying out energy audits and monitor the effectiveness of identified control measures; and
- Maintain clear and accurate records associated with any of the above responsibilities in such a way that they may be used as evidence when called upon by senior management.

Operations Manager

The Operations Manager (OM) has responsibility for the operational delivery of Energy Management at the centre.

The following is a summary of the main responsibilities of the OM as the responsible person at the centre for energy policy and legislative compliance. It is not exhaustive, and there will be further requirements in relation to specific legislation; and full details are contained within the energy arrangements.

Duties may be delegated as indicated in the following pages. Any deviation from the following distribution of duties must be confirmed to the individual concerned in writing.

The OM may delegate specific tasks to direct reports, (e.g. the Department Managers). Responsibility for the completion of those tasks will remain with the OM.

The OM must ensure that the responsibilities set out in this document are understood by the relevant individuals where they are delegated.

- **Energy policy and procedures**
  
  The OM will be responsible for the operational implementation of the energy policy and procedures, and any additional policies and procedures issued by the Group Energy Team to the centre.

  Responsibility for the responsible use of energy by, contractors, members of the public and others within the common areas and directly managed areas of the centre, in so far as is reasonably practicable. (Tenants have responsibility for the management of energy within their own demise).

- **Energy bi annual meeting**

  Organise, schedule and chair the centre Energy Meeting.

  Ensure that minutes are accurately recorded with actions and timescales for completion, and that issues that require escalation are communicated to the Group Energy Team, Regional Centre Directors, General Managers and appropriate Directors for action. Ensure that there is suitable consultation with employees in relation to matters of energy.
• **Energy training**
  Ensure that all intu Retail Services staff operating in the centre are competent to discharge their energy responsibilities.

  Complete training needs analysis as necessary, to identify where additional training may be necessary. Coordinate training needs with the HR and Group Energy Teams.

**On Site Energy Managers or equivalent**

Responsibilities include the following; the list is not exhaustive, and other energy related responsibilities will be expected to be managed as they become apparent, or as instructed by the Technical Services Director, OM or Group Energy Team. Each centre must have a delegated energy manager, if this delegate leaves the responsibility defaults to the technical services manager until a new delegate is selected, if neither energy manager nor technical services manager is in place, responsibility falls to operations manager, this delegation should be recorded.

• **Quarterly Energy Meetings**
  Attend the centres Quarterly Energy Meeting and provide commentary of items affecting current energy performance of centre

• **Group Energy Meetings**
  Attend group energy meetings and disseminate information from these meetings to relevant people within centre.

• **Energy training**
  Assist managers and staff to identify energy training needs.

• **External Consultants/Internal audit**
  Assist the OM, TSM and Business Support Manager (BSM), responsible for managing and co-coordinating inspections, surveys and audits as required by the Group Energy Team or Intu Property Services.

• **Energy monitoring and reporting**
  Provide information for the centre’s Quarterly Energy Meeting, Board Reports and other meetings as required.

• **Energy policy and processes**
  Ensure that energy policy and processes including site energy plan are up to date and implemented.

• **Promote energy efficiency**
  Promote energy awareness and an energy efficient culture throughout the centre, leading by example.

**Compliance Manager or equivalent**

Reporting to the OM, the Compliance Manager (GSM) is responsible for the Energy duties listed below.

The list is not exhaustive, and other Energy related responsibilities will be expected to be managed as they become apparent, or as dictated by the OM or Group Energy Team. At centres where there is no Compliance Manager, the BSM will be responsible for the duties below or they are appropriately delegated to competent persons:

• **Quarterly Energy Meetings**
  Attend centre Energy Quarterly Meetings.

• **Energy reporting**
  Maintain the monthly energy reporting spread sheet in accordance with ENE-PRC-001.
  Liaise with the OM and Group Energy Team regarding any implications arising from energy reporting.
  Ensure TSM/Energy Manager on site feed into the energy CR reporting spread sheet and provide commentary of justification for increases/decreases in consumption.
  Ensure messages from energy reporting are communicated to senior management at centre and group energy management team via monthly reporting.
Technical Services Manager

Reporting to the OM, the Technical Services Manager (TSM) will fulfil their Energy duties through the implementation of responsibilities listed below.

The TSM must ensure that responsibilities set out in this document are understood by the relevant individuals where responsibilities are delegated.

The list is not exhaustive and other energy related responsibilities will be expected to be managed to meet statutory requirements, as they become apparent or as instructed by the OM or Group Energy Team:

- **Energy policy and procedures**
  Review all Energy related systems and arrangements on an on-going basis, and identify and report to the OM and Head of Energy, when improvements are considered necessary.

- **Quarterly Energy Meetings**
  Attend the centre’s Quarterly Energy Meetings.

- **Energy Legislation**
  Ensure that all statutory requirements for energy compliance are identified, planned and undertaken to maintain compliance with statutory requirements at all times.

- **Energy plan**
  In conjunction with site energy manager, manage site energy plan and ensure it is kept up to date, planned initiatives implemented and new initiatives planned.

- **Monthly Energy CR reporting**
  Manage the monthly reporting process, be aware of its outputs and act upon them, feed comments into monthly reporting.

**Line Managers, Supervisors and Duty Managers**

Responsible for:

- Ensuring energy policy and legislation is adhered to through the provision of training, information, instruction and supervision appropriate to the tasks, the risks and capabilities of the individual for the tasks they are given.
- Communicating opportunities for energy efficiency (or waste) to site energy manager and/or TSM.
- Reporting and escalating of any concerns over energy waste to their line manager, or one of the Group Energy Team.

**All staff**

Responsible for:

- Being aware of energy/environmental responsibility for actions in their roles as defined by managers, induction, and legislation.

The list is not exhaustive, and other Energy Management related responsibilities will be expected to be managed as they become apparent, or as dictated by the OM or Group Energy Team.

**6. Legal and other requirements**

The Group will maintain registers of all legal and other requirements to which it is expected to comply with via our external sub-contractor, System Concepts. They collate all legislation applicable to the company and detail this within our Legal Register. When legislation is updated they will inform the Group EHS Manager who will pass on actions to those effected.

The document is HS-REF-005, Legal Register, found on Mint within the Health and Safety Manual.
7. Objectives and programme(s)

The management programme will monitor the progress made against the objectives set out by Intu. The progress will be reported on at the Management Review Meetings, which are held a minimum of quarterly. The progress will be reviewed from all levels within the organisation and will consist of the following:

- Action to be taken.
- Person responsible for action.
- Means of delivery.
- Timescale of delivery.

In order to meet its Energy Policy Statement, Legal Responsibilities, and Stakeholder’s Views and to continually develop, the Group will define, manage and report on objectives and targets.

8. Competence, training and awareness

Intu will provide employees of an appropriate level of training and competence, to fulfil their roles and responsibilities throughout the organisation. This will be achieved through a combination of appropriate recruitment, training, selection and development of individuals, backed by advisory support.

The specific training needs of individuals will be identified in the following ways:

- Pre-appointment Assessments as appropriate;
- Competency and Training Matrices;
- Performance Reviews for all employees.

Managers at all levels are responsible for assessing and meeting the training needs of their employees. The HR and Group Energy Teams advise and assist managers in carrying out these tasks.

Scope

This procedure covers the training of new staff and the up-dating of current employees in new skills, and the appointment, instruction and provision of information to sub-contractors.

Responsibility

It shall be the responsibility of the Operations Manager or Department Head to ensure that the requirements of this procedure are followed.

Line managers have responsibility for identifying training needs in their direct reports, and ensuring that individuals are competent and capable for the tasks they are expected to perform.

Individuals have responsibility for raising any concerns they have with their own competence or ability to undertake designated tasks or responsibilities.

General

The Group will ensure that all persons working for or on behalf of the organisation are aware of the importance of conforming to the Energy Policy, their role and responsibilities within it, and the consequences of the departure from applicable Policy requirements.

9. Communication, participation and consultation

The company is committed to communicate the Group’s Energy Policy, Energy Management System and Energy Performance both internally and externally.

Internally this will happen top down via information provided at GM meetings and through the network of energy managers.

This will ensure that staff and other stakeholders are communicated with and kept fully informed of the organisation’s stated objectives and progress. This section should be read in conjunction with the arrangements for consultation and communication.

Externally the Energy Performance will be published within Intu Properties Annual CR report. The Policy and Energy Management System (via this manual) will be published on the Intu Group website, [https://www.intugroup.co.uk/who-we-are/governance/corporate-policies/](https://www.intugroup.co.uk/who-we-are/governance/corporate-policies/).

10. Operational control

The authorised manual is contained on the system, if printed out, this is an uncontrolled copy.
The organisation identifies within its Energy Management System, the criteria and methods to ensure effective planning, operation and control of the processes; this includes training, arrangements and auditing against both arrangements and the standard.

The operation of Energy at a local level will be the responsibility of the Operations Manager on site or the Department Heads within 40 Broadway.

**Implementation and operation**

In order to achieve its Energy Policy, objectives and targets, the Group will provide resources, capabilities, structure and support to the business.

These mechanisms will take into account the changing legal and business requirements of the Group, and to allow communication to take place both internally and externally.

The implementation and operation of the Energy Policy will ensure that continual improvement is central.

Responsibilities for implementation of this plan are detailed in the organisation and responsibilities section of this Manual.

**Checking and corrective action**

In order to ensure that the Energy Policy is maintained at the correct level across the Group, the system will need to be reviewed and checked on each site at regular intervals, and the findings recorded on the corrective action log within the Energy CR Calculation, ENE-FRM-008, and acted on.

**Performance measurements and monitoring**

A variety of monitoring techniques are used within Intu to measure energy performance. These include self audits at centre level, an internal audit programme for all centres and department, data and incident review both at the centre Quarterly energy Meeting but also for the Group at the CARG and corporate responsibility management committee.

**Specific and statutory inspections**

Certain issues require either, examinations and testing, statutory or formal inspection or reporting regime.

Such inspections will be carried out by competent persons, specifically appointed for the task.

The main appointments will be recorded within the relevant site log books, examinations and testing.

**Compliance monitoring**

The monitoring of compliance with stated arrangements is essentially a management driven function, assisted by the Group Energy Team, who will also complete inspections and audits in accordance with a defined visit programme.

Managers at all levels need to verify that stated procedures and approved methods are indeed being implemented, and that they are producing the desired outcome. If not, managers need to determine the appropriate actions to rectify non-compliance or instigate changes to the arrangements. These will be logged on the worksheet within Energy CR Calculation, ENE-FRM-008.

**Observation of people**

In addition to looking at physical conditions, people’s behaviour should be observed and monitored through supervision in the workplace, to help determine whether energy efficient systems of work are actually being achieved.

If an individual at work is seen to be significantly wasteful, managers must determine the reasons:

- Do relevant procedures exist?
- Are they appropriate and workable in the specific site conditions?
- Does the individual know of the procedures?
- Does the individual appreciate the risk of non-compliance?

One-to-one discussion is needed to determine the answers and to put in place appropriate solutions.

Employees are briefed on the importance of behavioural issues during induction and on-going training programme.
Purpose

To define the methods used to deal with issues that if left unresolved, may lead to an incident or non-conformance within the energy policy or procedures, and the steps taken to record the preventive actions that are taken, also to ensure that non-conforming products are identified, causes are considered, steps are taken to correct the problem and products/services are not used inadvertently.

Scope

To define the methods used to identify the potential cause of incidents or non-conformances, and the steps taken to prevent these from occurring, and where necessary, to correct and ensure that all records are maintained.

11. Operational considerations

Performance monitoring/control

1. Energy audits

Each Shopping Centre will conduct an annual intensive energy audit and bi annual check by a technical expert. Every 4th year a full ESOS audit will replace the intensive energy audit.

2. Energy performance certificate

A commercial EPC provides an energy rating for a building which is based on the performance potential of that buildings fixed services and fabric. Services such as lighting, heating, cooling and ventilation are taken into account as well as the way in which these services are controlled along with the insulation provided by windows and walls.

The now industry standardised A - G energy rating given on the certificate reflects the intrinsic energy performance standard of the building relative to a benchmark. The commercial EPC is accompanied by a secondary report that provides recommendations on how the energy performance of the building could be enhanced, together with an indication of the payback period. These recommendations are provided in four categories relating to the payback period.

EPC’s are a legal requirement both landlords (common) areas as well as retailer units (on sale or rent).

Commercial EPC’s for each Centre are retained where available and utilized as a tool for improving our energy performance.

Metering data collection

1. HH Electric

AMR:
Day plus one AMR data for HH electric meters is available via the Stark Save Energy Online dashboard. Monthly total report for each HH supply is ran at the end of each month, this report is archived at Centre (print to pdf).

Meter readings:
HH electric meters are also read manually so meter read consumption can be checked against AMR consumption as an error check.

2. Non HH Electric

AMR:
Automatic reading has been installed on non HH meters (access details to be added once this is in place with Utility/Stark) monthly reports are archived

Meter readings:
Non HH electric meters are also read manually so meter read consumption can be checked against AMR consumption as an error check.

3. Sub meters

Sub meters currently in place do not have AMR so are read manually. Sub meters when replaced or any new sub meters should meet the electric metering requirements defined below to enable AMR and hour plus one/real time data via GPRS and/or WiFi in future.
4. Gas meters

AMR:
Day plus one AMR data for gas meters is currently being facilitated. Shortly data will be available via the Stark Save Energy Online dashboard. Once in place monthly total report for each HH supply should be produced at the end of each month, and archived at Centre (print to pdf).

Meter readings:
Gas meters are read manually and consumption is calculated as per ENE-PRC-001 Procedure for monthly Energy CR reporting, more detail can be found in this document. When gas AMR is running meter read consumption can be checked against AMR consumption as an error check.

5. Water meters

Meter readings:
Water meters are read manually and water consumption is calculated monthly.

Meter collation/energy reporting

Energy data is collected as follows (More detail can be found in ENE-PRC-001).

Meter reads for each electric and gas supply are entered onto a energy CR calculation spread sheet, ENE-FRM-008, to calculate monthly consumption totals. These totals are used to check AMR monthly totals (if available) which are then summed to produce area and shopping centre monthly energy totals.

Monthly totals are compared with total for same area/centre for same month in previous year to check for significant change.

Centre totals for gas/electric/water are entered onto Info Exchange.

Where appropriate sub area totals such as retail parks/car parks are entered as a separate total into info exchange.

Where possible separable areas such as tenant consumption, retail park consumption, car park consumption will be calculated and entered into info exchange as a separate total.

(If separable areas are entered into info exchange as a separate total they should NOT also be included in the Centre total).

Meter specifications

All metering installed by Intu will meet the criteria defined below:

- As a minimum all meters installed for the measurement of gas/water/electricity will have a pulsed output to enable to use of automatic and/or real time meter reading.
- All meters will be of a type approved for tenant billing purposes (i.e. of an Offgen/MID approved type) even if at time of install they are not used for this purpose.

Planned targets and action plans

Intu will look to set internal targets at each centre on an annual basis, to demonstrate continual reduction in carbon emissions on a normalised basis. The targets set will be centre specific with separate target for each individual energy source but will form part of the groups commitment to 50% saving by 2020.

Performance against these targets will be monitored and reported internally on a monthly basis, with the portfolio performance reported internally on a quarterly basis.

Intu will set an overall portfolio target for each energy source at the commencement of each CR year.

Each Shopping Centre will produce an annual energy management plan, ENE-FRM-002, this will summarise the targets and proposed actions required to achieve these energy savings.
Measure specific energy plan sheets
(Major/Pilot/Best Practice Projects only)

Individual measure sheets, ENE-FRM-003, will be produced to provide details on costs associated with implementing new initiatives and predicted payback period is based on the reduction in energy costs relating to these actions. This will help provide evidence to fund the initiative and include in budgets. Reports for current year and previous years will be retained.

Measure specific completion review/best practice, ENE-FRM-007
(Major/Pilot/Best Practice Projects only)

On completion of each individual measure on ENE-FRM-003, a project summary, ENE-FRM-007, will be produced defining the success of the measure and lessons learned, the aspiration being to produce a best practice guide that can then be used by other centres to assist in spread of good practice.

12. Preventive action

Preventive actions, i.e. action taken to prevent an incident or non-conformance from arising, will include items such as observations made during internal audits, which if left unresolved, could result in a non-conformance from arising.

Preventative actions can also be utilised in cases where performance data is indicating a continual decline in energy performance, and where such action is necessary to stop this decline from continuing, to the point where it becomes necessary to issue non-conformances.

The overall aim of preventive actions is to stop problems from escalating, and to enable both continual improvement of the Energy Management System and enhancement of customer satisfaction.

Review of preventative action reports

All Preventive Actions shall be logged within the Energy CR Calculation document, ENE-FRM-008, reviewed during quarterly centre Energy Meetings, and discussed at Management Review Meetings.

13. Corrective action

Review of non-conformances

All non-conformances shall be logged within the Energy CR Calculation document, ENE-FRM-008, reviewed during Operational Meetings and discussed at Management Review Meetings.

Where non-conformance relates to energy, this should be reviewed at the Quarterly Energy Meeting, in addition to other appropriate meetings.

Corrective and preventive actions

All non-conformance reviews shall consider both corrective and preventive actions, i.e. action taken to prevent a recurrence of the problem, and the analysing of available data to assess whether there are any potential non-conformances.

When a non-conformance was/may be caused by a problem with the quality of service provided by the Group, the Group Energy Team shall consult with the appropriate managers/supervisors, and a revised procedure will be prepared where appropriate.

When it is discovered that the organisation’s written arrangements are inadequate, the Group Energy Manager shall review and revise the arrangements to remove the inadequacies.

Records

Records of all preventive actions should be maintained on the Info Exchange system. Preventative actions will be issued on the same documentation as non-conformances, but will be clearly identified as a preventive rather than corrective action.
14. Internal audit

Internal audits will be carried out in accordance with the Internal Audit Procedure, QUL-PRC-005, by the Group Energy Team, to demonstrate compliance to the ISO50001 Standard, and to satisfy statutory requirements. Frequency and scope of audits will be determined by the Group Energy Manager and approved by the CARG Board.

Copies of audits will be issued to the General Manager, Operations Manager, Regional Centre Director and Group Operations Director and any other parties deemed necessary.

15. Management review

The Energy Management System will be reviewed annually at one of the quarterly CARG meetings; these meetings will ensure that the Energy Management System remains suitable, adequate and effective. Minutes of CARG meetings will be maintained by the Group Energy Manager.

The meetings will also be used to assess the opportunities for improvement, and to evaluate the need for changes to the system and which will include policy and objectives.

At a centre level Energy will be reviewed on a quarterly basis and recorded as the centre’s energy meeting. Minutes will be maintained by the Operations Manager.