

ESOS Phase 4 Readiness Checklist

What you need lined up before scoping starts.

A 12-point pre-audit diagnostic from KEES — useful whether or not we end up doing your engagement. The faster these come together, the closer your engagement lands to four weeks rather than twelve, and the cleaner the final report.

The Phase 4 compliance deadline is **5 December 2027**. Environment Agency penalties for non-compliance run up to £50,000 plus £500 per day of continued non-compliance.

Scope readiness

- 1. Site list compiled.** Every premises operated in the UK during the qualifying year. Include leased, shared, and owner-occupied. Sites operated for only part of the year still count.
 - 2. Group corporate structure mapped.** Parent company, subsidiaries, JVs. ESOS scope covers all UK undertakings within the group, not just the named entity.
 - 3. Total energy consumption estimated (kWh).** Aggregate across electricity, gas, district heating, and transport fuels. ESOS audits must cover at least 95% of total energy use; the remaining 5% may be excluded as *de minimis*.
 - 4. Threshold qualification confirmed.** Your group must qualify on UK employee count (250+) and/or financial size (turnover >£44m AND balance-sheet >£38m). If you're a single-entity SME, you may fall outside scope — confirm before commissioning audit work.
 - 5. ISO 50001 status checked.** Full ISO 50001:2018 certification offers a partial compliance route that can significantly shrink the audit scope. Worth identifying early — it changes the engagement shape.
-

Data readiness

- 6. Twelve months of energy bills accessible.** Electricity, gas, district heating, transport fuels. The ESOS reference period is twelve consecutive months beginning no earlier than 12 months before the start of the compliance period, therefore for Phase 4, data cannot be any older than from 31 December 2025.
- 7. Granular data.** For sites with half hour electrical meters, this data is readily available from your suppliers. Organisations with road or off-road vehicles, contacting the original equipment manufactures (OEM) to understand which vehicles are reporting which data is key. Exporting consumption profiles directly from your supplier provides the granularity that bills or fuel reports cannot compete with.
- 8. Building floor area documented.** Gross internal area in m² for each site. Used to derive kWh/m² intensity benchmarks across your portfolio and against sector norms.

9. Transport energy quantified. Fleet fuel cards, mileage logs, business-travel fuel claims, employee grey-fleet mileage. Almost always the messiest dataset — starting early on this one pays the most.

Stakeholder readiness

10. Board-level director identified. ESOS reports must be approved and signed off by a director-level employee within the participant organisation. Decide who owns this before the audit begins, not after.

11. Internal energy data owner named. Usually someone in finance, facilities, or sustainability. The single point of contact who can answer billing and metering questions during the audit phase.

12. Site access logistics scoped. For each site in scope, who can let the Lead Assessor in for an energy audit and would be most knowledgeable to answer any site or process specific questions.

What happens once these are in shape

A 30-minute scoping call gets us to a fixed-fee quote. Engagement runs 4–12 weeks from kickoff to signed-off Environment Agency notification. Faster where the data above is already gathered.

4 – 12 weeks does not mean to start 4 – 12 weeks before the deadline, it is strongly recommended to start the exercise as soon as possible!

This will help you identify and implement any savings ASAP and it will also avoid any risk of delays due to the limited numbers of ESOS Lead Assessors.

Book a free 30-min scoping call: <https://calendly.com/kiro-kees/30min> **Or call:** +44 7521 650945

Kiro Tamer — Accredited Lead Assessor, EMA Register · ISEP · ISO 50001 KEES Ltd · ESOS Phase 4 specialists