



Navigating the Shifting Role of ESOS Lead Assessors

ESOS Lead Assessors have a critical role in the ESOS compliance process ensuring that organisations complete their compliance projects, and using their knowledge and experience to influence positive change to the better energy and carbon management practices. ESOS Lead Assessors should look beyond energy audits and reporting, and work with businesses to help them understand their energy use, and give them plans and solutions that are relevant and achievable to the business and lead to demonstrable and meaningful outcomes.

A good ESOS Lead Assessor must have a blend of specific skills and experience to plan an ESOS assessment, manage an assessment team, and review and approve the outcome of an assessment. Of course, they must also be registered with one of the approved registers for ESOS lead assessors. In broader terms an ESOS Lead Assessor should have:

Industry Experience:

Demonstrated by a solid background in energy management and energy auditing, preferably in sectors covered by the ESOS scheme. Experience in conducting onsite energy audits (incl. plant/boiler rooms) to identify poorly performing or inefficient equipment that would benefit from optimisation, upgrade or replacement is essential.

Knowledge of ESOS Regulations:

Demonstrated by a deep understanding of the ESOS regulations, which amongst many other aspects also include understanding the qualification

criteria, how to apply the available ESOS guidance, how to identify energy savings opportunities, energy usage patterns, and being familiar with any legal requirements and implications of non-compliance.

Technical Expertise: Demonstrated by technical expertise in energy systems (such as heating and water systems, cooling systems, pumping systems, air handling systems, lighting, compressed air, small power such as IT, kitchen, etc.) and their controls, low carbon solutions and behavioural change. They should be able to demonstrate their ability to carry out an assessment of all types of energy systems and equipment found onsite and in operational processes, and be able to identify techniques for energy savings and carbon reduction, and/or be able to review and approve assessments of other competent and skilled assessors.

Commitment to Self-Improvement and Development:

Keeping up to date and

understanding energy management developments and energy-saving technologies is also key for an ESOS Lead Assessor, and should be part of good practice and ongoing professional development of all. This helps in providing insightful assessments and identifying opportunities for improvement for their own organisations or clients.

For Phase 5, ESOS Lead Assessor applicants will also be required to demonstrate their decarbonisation assessment experience.

Communication Skills:

Demonstrated by excellent communication skills to convey findings, suggest improvements and work with various stakeholders, including senior management, to implement energy-saving initiatives effectively.

Project Management Skills:

Demonstrated by experience in planning and overseeing energy audits and teams, reviewing and approving assessments and their outcomes. Being able to manage multiple projects, timelines and

teams effectively is crucial.

Problem-Solving Ability:

Demonstrated by the ability to assess energy consuming systems and energy management practices, analyse energy data, identify inefficiencies and recommend cost-effective and practical solutions.

Be Independent and Objective:

All ESOS Lead Assessors should be impartial and ensure assessments are thorough and fair, without bias or influence.

Belong to a Professional Register for ESOS Lead Assessors:

All ESOS Lead Assessors must be accredited by an authorised professional body, such as the Energy Managers Association. This ensures the individual has the required knowledge and experience in energy management and audit practices, and has been through an appropriate approval process.

For fully defined competencies and responsibilities of ESOS Lead Assessors, refer to the core competencies, knowledge and skills published in the [*PAS 51215-2:2025 Energy and decarbonization assessment – Part 2: Competencies of lead assessors and assessment teams – Specification*](#). This Specification, alongside the [*PAS 51215 1, Energy and decarbonization assessment – Part 1: Process – Specification*](#), can be used on a voluntary basis for ESOS compliance. Further guidance on voluntary use of these PASs will be published in due course by the Environment Agency and DESNZ.

The existing competency *PAS 51215:2014 Energy efficiency assessment: Competence of a lead energy assessor – Specification*, will continue to be used as the competency standard for ESOS Lead Assessors for Phase 4.

If you are unsure where to start, reach out to the EMA and begin planning your ESOS journey today. To gain a deeper understanding of the ESOS Lead Assessor role, explore our interviews with two EMA accredited ESOS Lead Assessors.



Paul Thorn
Director
Direct
Efficiency Ltd

Can you describe what it's like to hold the role of an ESOS Lead Assessor?

I've been an ESOS Lead Assessor registered with the EMA since 2015 and gained my accreditation in time for ESOS Phase 1. At that time, I was already experienced in undertaking energy surveys as a consultant for the Carbon Trust. The ESOS Phase 1 just followed on, and I found similarities in completing an ESOS energy survey with the old Carbon Trust surveys.

Most of the time I work on my own, I conduct surveys from the start all the way to the ESOS compliance submission. When someone contacts me, (or finds me through the EMA), I explain the ESOS requirements to them, complete the energy surveys and put all the survey reports together, collate all the data for the total energy / transport consumption document etc. I then help my clients through the online ESOS submission process on MESOS and will normally hold a meeting while they complete their notification online.

Then there's another side to my ESOS involvement, where I just complete energy surveys and reports, and someone else acts as an ESOS lead assessor.

In my Carbon Trust days, I used

to visit a lot of different types of industries and businesses, and I've always felt quite confident about going into different types of environments. I can easily adapt to working with a hotel or restaurant chain as well as a manufacturing site.

How do you balance the demands of your job with other professional obligations or projects?

Working on ESOS assessments is a bit of a work flood and famine experience. The flood normally happens in the last two years of the four-year period, and especially in the last year. Participants seem to want everything done in the fourth year, when what they should be doing is getting the process completed over the four-year period. Ideally, all the energy surveys would be completed in the early period, and then by the time we get to the final submission date, all that should be left to do is getting the total energy consumption document completed.

I have some long-term clients who I've worked with over many years now and who I've coached into getting their energy surveys undertaken and completed in the first two years of the ESOS cycle. I am now beginning to remind them that they should be getting on with it for Phase 4, and we'll probably start getting the energy surveys done later this year.

You could say that the ESOS compliance continuity is there, but the first two years of the ESOS cycle could be the worst period workload wise and it can go very, very quiet. Unless there is an overlap between phases, which is happening now, when some companies are still completing their Phase 3 late

and there still is some ESOS work around.

That's why I've got other work. I complete heat meter surveys in buildings where I look at the feasibility of putting heat meters into commercial buildings to measure tenant floor LTHW and CHW energy consumption. I also undertake plant conditions surveys, and there is quite a high element of energy efficiency associated with them. I also undertake plant asset and planned preventative maintenance (PPM) registers and try to vary my different revenue streams between all those areas.

Whilst this could be the worst time for ESOS compliance from a consultant's view, there is still other work out there.

I haven't been involved with ESOS Action Plans yet as my clients have all just got on with them themselves, but I'm expecting maybe one or two might come back to me soon because they've maybe forgotten about them.

How does your professional status as a registered ESOS Lead Assessor impact the level of responsibility and influence you have within your clients' organisations?

As mentioned, I try to encourage some of my long-term clients to get their energy surveys undertaken early, but that very much depends on the individuals I am dealing with. People move around within jobs a lot and you very often find that the person that you maybe have been dealing with previously has moved on or gone into a different role. The continuity and opportunity to influence or embed knowledge can get fragmented a little bit, but I'd like to think that I try to give as best a service and advice as I can.

The responsibility is quite high because there are not many ESOS Lead Assessors, and a lot of work goes into completing ESOS assessments. You also want to make sure that people and organisations appreciate the fact that ESOS can work for them, and it shouldn't just be a tick in the box exercise. I also try to get across to them that this is going to be a long-term process, and they've really got to take part in it and get the most out of it.

However, I do feel that some clients



from smaller organisations shouldn't be in ESOS, as they don't have many buildings or a big transport fleet, yet they still qualify through qualification through staff numbers or turnover. For them, I get feedback that they feel ESOS is another bureaucratic hoop to get through, and all they want to do is to get on running their business.

Luckily many people I work with seem to want to embrace ESOS and get the most out of it. It can be quite a good experience for them and for you as a lead assessor, because they're learning about some of the

energy related dynamics behind their business and the energy they consume, and where within the organisation, because they might not always understand this in a bigger organisation.

What impact do changing regulations have on your role?

You really must keep your wits about you at the moment on the ESOS regulation side of things. I try and keep up with any updates and developments as much as I can through newsletters from the Environment Agency (EA) and updates from the EMA. I also disseminate the information out to clients because I think they need to know about any changes and to just keep on top of them. With ESOS you must keep an eye on the different upskilling and awareness opportunities too.

As I work on different types of projects and not ESOS compliance only, I have to make sure I keep on top of the regulation and updates as much as I can as part of my responsibility as a Lead Assessor, and also as a reviewer of ESOS Lead Assessor applicants.

Keeping on top of Phase 3 was difficult, mainly due to the changes applied by the EA during the Phase. Any changes maybe should have been proposed and discussed during Phase 3 and then introduced in time for Phase 4. It worked in the end only because of the extended deadlines, but it put many people under pressure with having to play catch up in some areas.

I did an ESOS survey for a company at the beginning of Phase 3 but with some of the ESOS Phase 3 changes, I had to keep making sure everything in my assessments was in line with the evolving regulations.

So, whereas I could have probably got it completed quicker. I felt for some clients as well because they wanted to get it done early but ended up not being able to move on when some of the regulation changed, and were almost punished for starting Phase 3 early.

Having said that, a lot of the information that you must now include, should have already been included anyway. To put a positive spin on it, I think the Phase 3 changes have tightened the whole ESOS assessment regulations up.

One of the biggest changes will be the inclusion around carbon regulations and reporting in ESOS from Phase 5. The energy savings opportunity is in the name of the scheme, so it was all about energy reduction and savings. If you aim to save CO2 emissions, for example by installing a solar PV system, you're not actually saving energy. For me there's a little bit of a conflict there between what was previously reported on and what will be expected in the future from lead assessors. Ultimately, you should follow the regulations and include what you feel is right for a site or an organisation.

Even though it's taken 10 years since the introduction of ESOS, I think Phase 4 is going to be a lot better, a lot tighter and the clients – participating organisations are getting more used to it, and realise they have to comply with it, especially as there's Phase 5 in

the future as well, which we must prepare for.



Adam Fairman
Senior Energy
Analyst
Welsh Water

Can you describe what it's like to hold the role of an ESOS Lead Assessor?

I've been a lead assessor since phase 2 of ESOS. I'm an internal Lead Assessor so I am only responsible for our own ESOS submission. We have a dedicated energy team who are continually looking to identify and deliver energy saving opportunities, so my role in ESOS is about making sure what we are doing aligns with the requirements and ensuring this is recorded and summarised in a compliant way. This streamlines our ESOS submission, minimising the amount of additional work needed to comply with the regulations.

How do you balance the demands of your job with other professional obligations or projects?

There are two sides to my role, data for regulatory reporting and data for business intelligence. We must report regulatory data on energy consumption to Ofwat with annual peaks between April and May, so fortunately it doesn't clash with the ESOS submission deadlines which helps to manage workload. The business intelligence work is important, but doesn't have the same hard deadlines so this fits

around the regulatory reporting.

How does your professional status as a registered ESOS Lead Assessor influence the level of responsibility you have within your organisation?

As an organisation in a highly regulated industry, regulatory compliance is taken very seriously. So, adding compliance to the cost saving opportunities puts the work higher up the agenda in the organisation. Because our ESOS submission must be signed off by directors, this increases the visibility of the work at a senior level. The fact that we have the internal competencies to comply with ESOS within our energy team, rather than relying on consultants, enhances the credibility of our team with senior leadership and continually enhances our internal capabilities.

What impact do changing regulations, or new ESOS Lead Assessor competency specification have on your role?

One of the main changes from this ESOS cycle is the requirement to submit an action plan and annual update. To minimise the amount of additional work, I have changed our internal energy savings opportunity tracker to automatically populate the information required for the action plan template. This way, opportunities get included in our action plan as part of the routine management of our energy saving programme, rather than creating more work and recording the same information in two different places.

