



**COMPLETE  
ENERGY  
CONSULTANCY**

## ENERGY STATEMENT

### CLIENT

Gavacan Homes Ltd

### PROJECT

Flats 1-4 & Coach House, Tormead, 27 Dene Road, Northwood, HA6 2BX

### PREPARED BY

R Britton

(Energy Assessor: OCDEA)

### ISSUE DATE

12<sup>th</sup> December 2025

### REPORT VERSION

Version 1.0

## EXECUTIVE SUMMARY

This energy statement presents the details of the energy strategy for this development. The statement demonstrates how the predicted carbon dioxide emissions of the proposed development will be reduced by the required percentages compared with a current Building Regulations Part L compliant building as required by the London Plan Policy SI 2 and Hillingdon Policies DMEI 2 and DMEI 10

The development is for the formation of 4 flats and a coach house.

The statement assumes that there are no separate plant rooms and equipment that would require calculation of un-regulated emissions.

The content of this statement and accompanying SAP reports demonstrate that the energy hierarchy and GLA's energy assessment guidance (June 2022) were followed in carrying out the energy assessments and in developing the energy strategy.

The client commits to the following proposal for meeting the requirements for the development:

- Installation of high efficiency Air Source Heat Pump.
- Utilisation of highly efficient building fabric.

The summary of the results using GLA's carbon emissions reporting spreadsheet shows that the proposed building meets the Policy SI 2 requirement to reduce overall carbon dioxide emissions by a minimum of 35%. The proposed building also meets the requirement for a minimum of 10% reduction in total emissions through energy efficiency improvements.

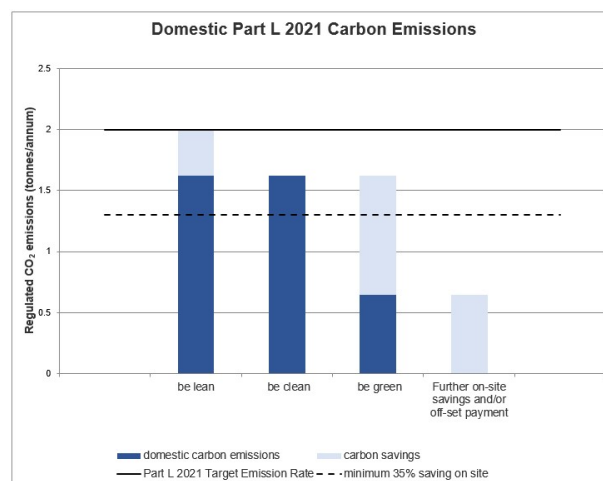


Figure 1 Carbon emissions based on the Energy Hierarchy.

This statement outlines the details of the analysis and the results.

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## 1 INTRODUCTION

Complete Energy Consultancy was appointed to prepare an energy statement for this project. This energy statement is structured as follows:

Section 2 presents the policy context from regional authority to local authority;

Section 3 presents the methodology followed in order to carry out the energy assessments;

Section 4 shows the building plans that were used for the modelling and calculations;

Section 5 presents the results of the calculations;

Section 6 concludes this report.

## 2 POLICY CONTEXT

National and regional planning policy is enacted and applied at the local level and in that context the main policies applicable to the energy strategy of this development are The London Plan Policy SI 2 and local authority policy EQ1.

### 2.1 The London Plan Policy SI 2

The London Policy SI 2 is presented below.

#### Policy SI 2 Minimising greenhouse gas emissions

- A Major development should be net zero-carbon.<sup>151</sup> This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- 1) be lean: use less energy and manage demand during operation
  - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
  - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
  - 4) be seen: monitor, verify and report on energy performance.
- B Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.
- C A minimum on-site reduction of at least 35 per cent beyond Building Regulations<sup>152</sup> is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
- 1) through a cash in lieu contribution to the borough's carbon offset fund, or
  - 2) off-site provided that an alternative proposal is identified and delivery is certain.
- D Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.

<sup>151</sup> Where zero-carbon is used in the Plan it refers to net zero-carbon – see Glossary for definition.

<sup>152</sup> Building Regulations 2013. If these are updated, the policy threshold will be reviewed. <https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-i>

- E Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.
- F Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

Figure 2 The London Plan Policy SI 2

The Energy Hierarchy referred to in the London Plan Policy SI 2 above is shown diagrammatically below.

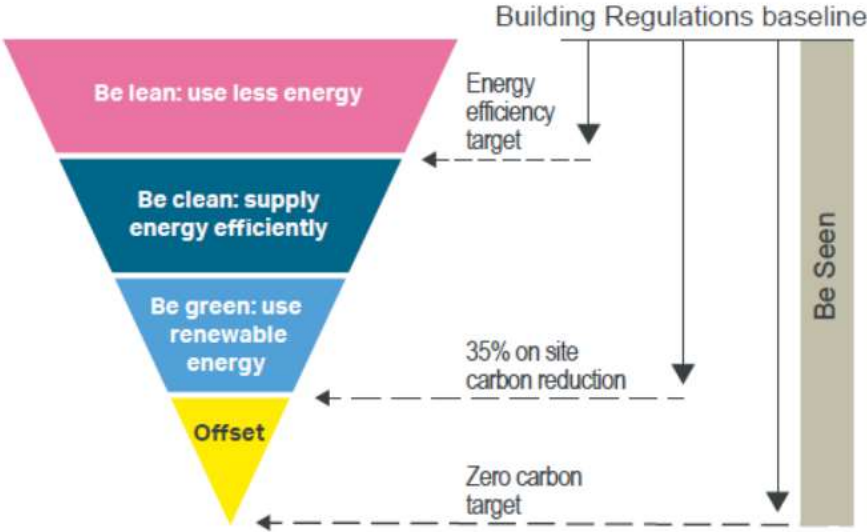


Figure 3 - The Energy Hierarchy

## 2.2 Local Authority Policy

The Hillingdon plan stipulates the carbon and energy requirements for developments in the area as shown below.

### **Policy DMEI 2: Reducing Carbon Emissions**

- A) All developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.**
- B) All major development<sup>7</sup> proposals must be accompanied by an energy assessment showing how these reductions will be achieved.**
- C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, where it is clearly demonstrated that the targets for carbon emissions cannot be met onsite, the Council may approve the application and seek an off-site contribution to make up for the shortfall.**

### **Policy DMEI 10: Water Management, Efficiency, and Quality**

- A) Applications for all new build developments (not conversions, change of use, or refurbishment) are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy (Policy 5.13: Sustainable drainage).**
  - B) All major new build developments, as well as minor developments in Critical Drainage Areas or an area identified at risk from surface water flooding must be designed to reduce surface water run-off rates to no higher than the pre-development greenfield run-off rate in a 1:100 year storm scenario, plus an appropriate allowance for climate change for the worst storm duration. The assessment is required regardless of the changes in impermeable areas and the fact that a site has an existing high run-off rate will not constitute justification.**
  - C) Rain Gardens and non householder development should be designed to reduce surface water run-off rates to Greenfield run-off rates.**
  - D) Schemes for the use of SuDS must be accompanied by adequate arrangements for the management and maintenance of the measures used, with appropriate contributions made to the Council where necessary.**
  - E) Proposals that would fail to make adequate provision for the control and reduction of surface water run-off rates will be refused.**
  - F) Developments should be drained by a SuDS system and must include appropriate methods to avoid pollution of the water environment. Preference should be given to utilising the drainage options in the SuDS hierarchy which remove the key pollutants that hinder improving water quality in Hillingdon. Major development should adopt a 'treatment train' approach where water flows through different SuDS to ensure resilience in the system.**
- Water Efficiency**
- G) All new development proposals (including refurbishments and conversions) will be required to include water efficiency measures, including the collection and reuse of rain water and grey water.**
  - H) All new residential development should demonstrate water usage rates of no more than 105 litres/person/day.**
  - I) It is expected that major development<sup>8</sup> proposals will provide an integrated approach to surface water run-off attenuation, water collection, recycling and reuse.**

### **Water and Wastewater Infrastructure**

- J) All new development proposals will be required to demonstrate that there is sufficient capacity in the water and wastewater infrastructure network to support the proposed**

**development. Where there is a capacity constraint the local planning authority will require the developer to provide a detailed water and/or drainage strategy to inform what infrastructure is required, where, when and how it will be delivered**

### 3 METHODOLOGY

Following the energy hierarchy above, London Policy SI 2 provides the following approach for demonstrating compliance with more details provided in GLA’s energy assessment guidance.

1. Baseline - Calculation of the energy demand and carbon emissions covered by Building Regulations and, separately, the energy demand and carbon emissions from any other part of the development, including plant or equipment, that are not covered by the Building Regulations (i.e. the unregulated emissions), at each stage of the energy hierarchy.
2. Be Lean - proposals to reduce carbon emissions beyond Building Regulations through the energy efficient design of the site, buildings and services, whether it is categorised as a new build, a major refurbishment or a consequential improvement.
3. Be Clean - proposals to further reduce carbon emissions through the use of zero or low-emission decentralised energy where feasible, prioritising connection to district heating and cooling networks and utilising local secondary heat sources.
4. Be Green - proposals to further reduce carbon emissions by maximising opportunities to produce and use renewable energy on-site, utilising storage technologies where appropriate.

In addition, the GLA energy assessment guidance requires the reporting Energy Intensive Units (EUI) and space heating demand of developments. Developments are encouraged to improve performance where possible and should aim to achieve energy demands lower than the values in table below.

Table 1 – Maximum energy and space heating demand values

Building type	Energy Use Intensity (kWh/m <sup>2</sup> /year)	Space Heating (kWh/m <sup>2</sup> /year)
Residential	35	15
School	65	15
Office	55	15
Hotel	55 <sup>23</sup>	15
All other non-residential	55	15

## 5 CALCULATIONS & RESULTS

The calculations were carried out based on SAP10.2.

### 5.1 BASELINE Calculations

To determine the baseline, GLA energy assessment guide for London provides the following guidance.

- a. The energy assessment must first establish the regulated CO<sub>2</sub> emissions baseline assuming the development complied with Part L 2021 of the Building Regulations using Building Regulations approved compliance software for SAP/SBEM.
- b. To determine the CO<sub>2</sub> emissions baseline, Target Emission Rate (TER) from the final proposed building specification should be used, i.e. the rate from the modelling results of the 'be green' stage of the energy hierarchy.
- c. For each non-residential building the TER should be multiplied by its floor area to provide the regulated CO<sub>2</sub> emissions. For each representative dwelling type, the TER is multiplied by the cumulative floor area for that dwelling type to establish the CO<sub>2</sub> emissions. The CO<sub>2</sub> emissions for each non-residential building and dwelling type are then summed to give the total regulated emissions for the development.

As the TER is based on notional building specifications, it is deduced that the notional specifications are used as baseline specifications as shown in the table below.

Table 2 – Limiting and Notional U-Values

Element	Limiting U-Values	Notional U-Values
Wall	0.70	0.30
Roof	0.35	0.16
Floor	0.70	0.25
Glazed Windows and Doors	1.6	1.6
Doors	1.6	1.6
Rooflights and Roof Windows	2.2	1.6
Air Permeability	15	15

For dwellings, the notional (i.e. TER) is based on gas boiler irrespective of fuel used in the proposed dwelling. For non-residential, the notional is based on whatever fuel that is used in the actual. Also, the notional specifications for dwellings and non-dwellings include some solar PV but these are accounted for in the analysis.

Table 3 - Other Specifications for the Baseline Calculations

<b>Parameter</b>	<b>Value</b>
Heating System	<b>Gas boiler</b>
Hot Water	<b>via gas boiler</b>
Lighting Illuminance (lumens/Watt)	<b>100</b>
Approved Construction Details	<b>Yes</b>
Solar PV	<b>Yes (but accounted for in GLA's carbon emissions reporting spreadsheet)</b>

### 5.1.1 Emissions Calculations

The results of the SAP calculations show that the Notional TER from the 'be green' calculations will generate 11.08 kgCO<sub>2</sub>/year/m<sup>2</sup> which equates to 2,001 kgCO<sub>2</sub>/year. As renewable energy is applied to the Notional dwelling, the results show 528 kgCO<sub>2</sub>/year savings but these will be accounted for in the GLA's carbon emissions reporting spreadsheet.

## 5.2 Be LEAN Calculations

Be Lean is about reducing energy use through energy efficiency measures. The GLA guidance on energy assessment stipulates that Be Lean CO2 emission should be lower than the baseline by at least 10%. This can be achieved through measures such as:

- Improving the insulating properties of exposed thermal elements such as doors, windows, wall, floor and roofs. Adopting fabric u-values lower than the notional u-values is proposed.
- Utilising HVAC systems that are of high efficiency.
- Energy efficient lighting such as LEDs with lumens/circuit watt higher than the maximum in building regs is proposed.
- Air leakage from building is a source of heat loss. Therefore, lower air leakage rates are proposed.
- Utilising efficient thermal bridges details is proposed.
- Use of smart technologies such as weather compensation control for heating etc.

As the baseline calculations is based on notional u-values, it is proposed that the development will utilize u-values that lower than notional u-values as shown in the table below.

Table 4 - Limiting, Notional and Proposed u-values (dwellings)

Element	Limiting U-Values	Notional U-Values	Proposed U-Values
Wall	0.70	0.30	0.14
Roof	0.35	0.16	0.10
Floor	0.70	0.26	0.11
Glazed Windows and Doors	1.6	1.6	1.3
Doors	1.6	1.6	1.3
Rooflights and Roof Windows	2.2	1.6	1.3
Air Permeability	15	15	15

Table 5 - Other Specifications for Be Lean Calculations

<b>Parameter</b>	<b>Value</b>
Heating System	<b>Gas boiler</b>
Hot Water	<b>via gas boiler</b>
Lighting Illuminance (lumens/Watt)	<b>100</b>
Approved Construction Details	<b>Yes</b>
Solar PV	<b>No (but accounted for in GLA's carbon emissions reporting spreadsheet)</b>

### 5.2.1 Emissions Calculations

The results of the SAP calculations show that the proposed development will generate 11.9 kgCO<sub>2</sub>/year/m<sup>2</sup> which equates to 2,149 kgCO<sub>2</sub>/year. Although this seems higher than the baseline of 2,001 kgCO<sub>2</sub>/year, however, the baseline which is based on notional incorporates renewable energy that led to 528 kgCO<sub>2</sub>/year savings. Therefore, the net carbon emission for the 'be lean' assessment is 380 kgCO<sub>2</sub> which is about 19% savings thereby meeting the GLA's requirement for at least 10% savings to come from 'be lean' measures.

### 5.3 Be CLEAN Calculations

Be clean is about proposals to further reduce carbon emissions through the use of zero or low-emission decentralised energy where feasible, prioritising connection to district heating and cooling networks and utilising local secondary heat sources such as Combined Heat and Power (CHP), Combined Cooling, Heating, and Power systems (CCHP), and community heating systems.

Consideration has been given to the feasibility of connecting to an existing or planned district heating network but no feasible and practicable local or district heat network exist in the locality of the development.

The installation of an on-site community space heating and hot water network in the development site itself has been considered, but as this is a single end-terraced house being built next to existing houses, such communal heating system is not feasible and practicable.

As there are no feasible or practicable means to implement any 'be clean' measure, there are no carbon savings from this stage of the hierarchy.

## 5.4 Be GREEN Calculations

The following renewable energy technologies were considered for this development.

- Biofuels
- Ground Source Heat Pump (GSHP)
- Air Source Heat Pump (ASHP)
- Hydroelectricity
- Solar Photovoltaic (Solar PV)
- Solar Thermal (Solar Hot Water)
- Wind Turbines

As required by the GLA’s guidance on energy assessments, only the most feasible options being considered should be presented in the body of this statement, with the rest being in the appendix.

ASHP and Solar PV are the most likely options for consideration for this development. The table below shows the assessments of these two options and appendix 1 shows the assessment of all options.

Table 6 – Renewable technology assessment (Solar PV and ASHP)

Technology	Criteria	Assessment	Overall suitability
<b>Solar PV</b>	Suitable roof orientation, lack of shading Sufficient roof space Capability to export to the national grid	In SAP10, the KWp of PV requirement to achieve a pass using gas boiler is high. With export capable meter, the KWp requirement is reduced considerably but there is significant infrastructure requirement to be able to connect to the national grid.  If it is not possible to connect to the national grid, then the roof space is not likely to be sufficient to install the panels required to achieve the KWp.  Also, the nature of the roof means that any installation of panel will be on multiple orientations which could degrade the KWp output and increase thermal losses.	<b>Suitable</b>
<b>Air Source Heat Pump</b>	Carbon emissions reduction capability Sufficient space for ASHP and auxiliary equipment Sufficient distance between installation and neighbours to avoid noise disturbance	Reduces carbon dioxide emissions significantly compared with mains gas.  Recent ASHPs for dwellings are much quieter and as this is an end terrace, there is sufficient space for installation of the condenser as well as opportunity to avoid any noise issue for neighbours.	<b>Suitable</b>

Air Source Heat Pump was deemed to be the most practicable and feasible option for this development. Therefore, the developer proposes the improvements below in order to achieve the requirement for 35% reduction in CO2 emissions:

- Installation of high efficiency Air Source Heat Pump

### 5.4.1 Emissions Calculations

The results of the SAP calculations show that the proposed development will generate 4.65 kgCO<sub>2</sub>/year/m<sup>2</sup> which equates to 415 kgCO<sub>2</sub>/year. As the 'be lean' carbon dioxide emissions is 799kgCO<sub>2</sub>/year, the savings resulting from the 'be green' measure is 564 kgCO<sub>2</sub>/year which equates to 55% savings.

Table 7 – Carbon dioxide saving from each stage of the Energy Hierarchy

	Total regulated emissions (Tonnes CO <sub>2</sub> / year)	CO <sub>2</sub> savings (Tonnes CO <sub>2</sub> / year)	Percentage savings (%)
Part L 2021 baseline	2.0		
Be lean	1.6	0.4	19%
Be clean	1.6	0.0	0%
Be green	0.6	1.0	49%
Total Savings	-	1.4	68%
	-	<b>CO<sub>2</sub> savings off-set (Tonnes CO<sub>2</sub>)</b>	-
Off-set	-	<b>19.4</b>	-

The table shows that the Be Lean measures led to a reduction of 19% in emissions with a further 49% reduction coming from Be Green measures leading to a total of 68% savings.

### 5.4.2 Energy Intensive Units (EUI) Calculations

The table below shows the results of the EUI and space heating calculations. The results show that the EUI and space heating demand from the development are well below the maximum stipulated in Table 4 of GLA's guidance on energy assessments.

Table 8 – EUI and space heating demand

Building type	EUI (kWh/m <sup>2</sup> /year) (excluding renewable energy)	Space heating demand (kWh/m <sup>2</sup> /year) (excluding renewable energy)	EUI value from Table 4 of the guidance (kWh/m <sup>2</sup> /year) (excluding renewable energy)	Space heating demand from Table 4 of the guidance(kWh/m <sup>2</sup> /year) (excluding renewable energy)
Residential	3.456035437	10.8414175	35	15

### 5.4.3 Fabric Energy Efficiency Standard (FEES)

The table below shows the results the total Part L Fabric Energy Efficiency Standard (FEES) as required by the GLA's guidance on energy assessments. The results show a 34% improvement over the proposed building over the target.

Table 8 – Fabric Energy Efficiency Standard

	Target Fabric Energy Efficiency (kWh/m <sup>2</sup> )	Dwelling Fabric Energy Efficiency (kWh/m <sup>2</sup> )	Improvement (%)
<b>Development total</b>	49.20	32.80	33%

## 6 CONCLUSION

The content of the report and accompanying SAP reports demonstrate that the energy hierarchy and building regulations requirements were followed in carrying out the calculations.

The results of the calculations show that the building meets the requirement to reduce CO<sub>2</sub> emissions by a minimum of 35%. It also meets the requirement for a minimum of 10% reduction in total emissions through energy efficiency measures.

## 7 REFERENCES

The London Plan 2021 – The Spatial Development Strategy for Greater London

Energy Assessment Guidance: Greater London Authority guidance on preparing energy assessments as part of planning applications (June 2022)

The London Borough of Hillingdon Local Plan

## Appendix 1 – Renewable Technology Feasibility Assessment

Technology	Criteria	Assessment	Overall suitability
<b>Biofuels</b>	<p>Year-round heat demand Established supply chain</p> <p>Sufficient space for delivery of fuel</p> <p>Sufficient space for storage of fuel</p> <p>Sufficient space for boiler and auxiliary equipment</p> <p>Can the flue be designed to meet planning authority requirements</p>	<p>Development is residential with seasonal and daily variations in heat demand.</p> <p>Insufficient space on site for location of plant room and storage of fuel. Fuel delivery issues re. traffic movements to and from site. Significant access problems.</p>	Not suitable
<b>Ground Source Heat Pump</b>	<p>Sufficient space for horizontal coil or separation of multiple boreholes</p> <p>Ground suitable for vertical drilling and avoidance of obstacles</p> <p>Sufficient space for GSHP and auxiliary equipment</p>	<p>Closed loop indirect borehole system possible but insufficient space for horizontal coil. Significant access problems.</p> <p>Unknown soil and geological conditions.</p>	Not suitable
<b>Air Source Heat Pump</b>	<p>Carbon emissions reduction capability</p> <p>Sufficient space for ASHP and auxiliary equipment</p> <p>Sufficient distance between installation and neighbours to avoid noise disturbance</p>	<p>Reduces carbon dioxide emissions significantly compared with mains gas.</p> <p>ASHPs are much quieter in recent times and as this is an end terrace, there is sufficient space as well as opportunity to avoid any noise issue for neighbours.</p>	<b>Suitable</b>
<b>Hydroelectricity</b>	<p>Nearby watercourse with sufficient head</p> <p>Permission available for access to watercourse</p> <p>Climate change modelling confirms longevity of watercourse (25 yrs)</p>	No suitable water course nearby.	Not suitable
<b>Solar PV</b>	<p>Suitable roof orientation, lack of shading</p> <p>Sufficient roof space</p> <p>Capability to export to the national grid</p>	<p>In SAP10, the KWp of PV requirement to achieve a pass using gas boiler is high. With export capable meter, the KWp requirement is reduced considerably but there is significant infrastructure requirement to be able to connect to the national grid.</p> <p>If it is not possible to connect to the national grid, then the roof space is not likely to be sufficient to install the panels required to achieve the KWP.</p> <p>Also, the nature of the roof means that any installation of panel will be on multiple orientations which could degrade to KWp output and increase thermal losses.</p>	<b>Suitable</b>
<b>Solar thermal</b>	<p>Suitable roof orientation, lack of shading.</p> <p>Sufficient roof space.</p> <p>Year-round hot water demand.</p> <p>Compatibility with proposed heating system.</p> <p>Sufficient space for communal or individual hot water storage</p>	<p>Sufficient roof space. Panels can be mounted at an angle and at an appropriate orientation.</p> <p>Would require community heating system or installation of a hot water cylinder in each apartment. High heat losses from distribution system.</p> <p>Only offsets mains gas so carbon dioxide emission reductions would be &lt;10%.</p>	Not suitable

<b>Wind turbines</b>	<p>Sufficient wind speed.</p> <p>Area free from obstructions / causes of turbulence.</p> <p>Sufficient open space for installation.</p> <p>Sufficient distance between installation and neighbours to avoid noise disturbance</p>	<p>Sub-urban location with insufficient wind speed.</p> <p>No suitable location on the building itself.</p>	Not suitable
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## Appendix 2 – SAP Results and Worksheets

Please see attachments which includes:

- Be Lean SAP Worksheets
- Be Lean U-Value Calculations
- Be Lean Thermal Bridges
- Be Green SAP Worksheets
- Be Green SAP BREL Report
- Be Green Predicted EPC
- Be Green SAP Specification Form
- GLA's carbon reporting spreadsheet

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