

CCA for Data Centres

Do I need an energy consultant?

Introduction

A number of our members report that they have been approached by energy management consultants offering to facilitate the CCA process for them. They have asked us for advice and recommendations on whether they need such services and if so, how to choose a consultant.

While we are reluctant to recommend one consultant over another because individual requirements vary so much, we can share feedback that we have received from members and we can also state facts that may be helpful when you are assessing the services they offer and whether they are likely to meet your needs.

All CCA participants are obliged to pay an initial registration fee for the CCA process and an annual administration fee, invoiced by techUK. This covers all Environment Agency fees and the cost of registering, checking and processing the data, the provision of necessary documentation, guidance materials and a dedicated helpline. It does not cover the collection, analysis, collation and preparation of your data, site visits or the kind of bespoke advice that would require a detailed understanding of your operation. You can find a list of what is included in your CCA fees at the end of this document.

Whether or not you need consultancy services will depend a lot on the in-house skills that you can call on, and it is important that everyone understands what is already included - and excluded - so that gaps can be identified and so that nobody is paying for anything twice. Transparency here will ensure that any additional consultancy is adding real value to the process for participants.

As a rule of thumb, you should not need a consultant to explain the nuts and bolts of the CCA process to you, but you may benefit from strategic advice either to assess the extent to which you can participate or to clarify how participation can best contribute to your corporate energy management strategy looking ahead. You may of course choose to have the process facilitated for you by a third party even if you don't feel it is strictly necessary.

As the industry association responsible for negotiating the Climate Change Agreement for data centres on the basis that a CCA will deliver greater carbon savings than existing policy measures, we are committed to ensuring that the scheme delivers on its policy objectives and that we can demonstrate this to be the case. We see an important role for all stakeholders in helping deliver this.

Don't forget that the CCA is open to all eligible facilities. You don't have to be a member of techUK to join the CCA. Similarly all the information, guidance, documentation, industry briefings and the helpline are open to all and free.

The following notes explain this in more detail. They were written in response to queries and feedback we have received from members so they are not meant to be comprehensive. They cover:

1. [Circumstances when you don't generally need a consultant](#)
2. [Circumstances when the services of an energy management consultant could be beneficial](#)
3. [How you go about choosing an energy management consultancy](#)
4. [What is included in your administration fee](#)
5. [Contact details and links](#)

1 You don't need an energy consultant...

- to fill in your application and registration forms.
- if you are ineligible for the scheme.
- if your energy data is fit for purpose

You don't need a consultant to fill in your application and registration forms.

Help with registration and the associated administration process is something that you have paid for in the registration and administration fees and is not something that you should need consultancy advice for. There is a helpline, your data will be checked on arrival and issues will be identified. Moreover, the legal responsibility for participating and any associated undertakings rests with the data centre operator and cannot be devolved to an agent, so it is important that you are engaged in this process. The application process asks for information about how your site operates and no one knows that better than you. The only 'CCA specific' information asked for is the 70/30 assessment and then can be easily undertaken by someone capable of estimating the energy use of certain areas of the site.

You don't need a consultant if you are ineligible.

For companies that are clearly ineligible (enterprise operators who are not providing data centre services to third parties) there is little that an energy management consultancy can do at this time to facilitate an application because these facilities sit outside the eligible cohort of data centres.

There is, however, a possibility that the scheme will be expanded at some stage in future. In the meantime there are things that you can do, either on your own or in conjunction with consultants:

1. Make sure your IT energy load is sub-metered. 12 months of auditable, sub-metered total site energy: IT energy data will be a prerequisite for scheme entry.
2. Keep an eye on relevant developments – you may wish to do this yourselves by registering for our CCA stakeholders group – contact alec.broadhurst@techuk.org. You don't need to be a member of techUK to join this group or participate in the CCA.
3. Prepare energy intensity data so that you are ready to demonstrate eligibility when needed. We can help you do this: contact emma.fryer@techuk.org for more information.

You don't need a consultant if your energy data is fit for purpose

If you can provide and label schematic site plans and if your energy data is accurate, auditable and relates to the relevant time periods then you should not need external help. That said, there is no reason why you shouldn't use consultancy if you want (in the same sense that you don't need a cleaner if you are capable of cleaning your own house but you may prefer it!) and many of you will already have long term relationships with energy consultants who can help you with this process at marginal cost.

2 You may need an energy consultant

- If your energy data is not fit for purpose
- If you don't know whether you are eligible or not
- If you need help planning or implementing your energy saving strategy

You may need consultancy if your energy data is not fit for purpose

The quality of energy monitoring varies widely across the data centre sector. Some data centre operators have been measuring PUE in line with external industry standards like the Green Grid for years. Some participate in the EU Code of Conduct, applying efficiency measures in line with its guidance and practices and submitting data regularly. Others are less advanced in their approaches to energy management and monitoring and may struggle to produce twelve months of auditable PUE data for the baseline year or even for subsequent years. These operators are likely to need help in sourcing and assembling relevant data.

You may need consultancy services if you don't know whether you are eligible or not

BUT do start with the free helpline because this may give you a quick answer. If you are a member of techUK you can get free advice from us too. This will be based on our understanding of the scheme rules and how they are being applied. However, if you need bespoke, technical or detailed advice or assessment then this is a good role for an energy management consultant who can add real value.

You may need consultancy services when you are planning and implementing energy savings

The CCA is designed to encourage good energy stewardship and the uptake of technologies that improve the way that energy is used in data centres. The way that the sector responds to the CCA will be under considerable scrutiny and we believe that there is an important role for energy consultancies in helping participants develop their energy management strategies and in helping them choose and implement appropriate energy saving technologies in their data centres.

Some data centre operators already have very advanced energy management processes in place and comply with a range of external, audited standards, so the requirement will vary. In this case your requirement for additional consultancy is a bit like having a personal trainer—some people need a trainer just to get off the sofa, some people keep themselves fit but have a trainer just to keep motivated, and some people don't use a personal trainer whether they need one or not.

3 So how do I choose an energy consultant?

- **What you should be able to expect from consultancies**
 - Transparency
 - Demonstrable track record in data centres as opposed to just CCAs
 - Ability to meet your strategic needs as well as your energy management needs
- **Recommendations and feedback**
- **Other things to be aware of**

What you should be able to expect from consultancies

We can't pick a consultancy for you but we can suggest a few things you might look out for. These include the following:

Transparency

You should expect your consultancy to have alerted you to this scheme and to the information that is already available. If you are clearly eligible - a wholesale or retail colo - we would expect that at the very least that they would also have alerted you to the free guidance and to the sector briefing sessions which were arranged specifically for you. If you are likely to be ineligible then it would make more sense for consultants to monitor progress on behalf of a number of clients and report back on the state of play.

You should also expect them to be clear about the services they are providing over and above the services that are covered by your registration and administration fees.

Demonstrable track record in data centre energy management (as opposed to CCAs)

The CCA for data centres differs from other CCAs in a number of very significant ways. With this in mind we think that if we had to choose between a consultancy with proven expertise in data centres and one that specialises in CCAs across different sectors, we would opt for the former. No consultancy will have previous experience in data centre CCAs because this sector is new to the scheme.

Ability to meet your strategic needs as well as your energy management needs

In some cases – particularly in the case of operators who are uncertain regarding their eligibility - it may be advantageous to be able to call on the services of a consultancy that has been engaged in the actual policy process that brought about the CCA, who will have a more strategic understanding of the policy objectives relating to the data centre CCA, to the unique restrictions that this CCA is under and the reasons behind them. It is likely that such consultancies will be better informed about the chances of eligibility, both now and in future, than those who have not been engaged in the process at first hand. There are only four of these and we can identify them on request.

Recommendations and feedback

As mentioned above we are reluctant to make recommendations because operator requirements vary so much but we can pass on feedback when relevant and put participants in touch with each other to exchange information. However, if you would like an informal chat please contact emma.fryer@techuk.org

Other things to be aware of

- Anyone who says –“we will take the whole process off your hands including the registration.” Firstly it is not strictly true because any data centre company will have to provide information to the consultant to enable them to prepare the information requested in the application pack. Secondly you will be paying twice for some elements of the service. As long as you are happy about it, that’s fine.
- Anyone who charges you a percentage on your rebate rather than a set fee proportionate to the services provided is unlikely to deliver value for money unless you have a very small site.
- Anyone who suggests that participation in the CCA does not require you to implement improvements in energy stewardship. The opposite is true and such lack of ambition and cynicism will not just result in you missing your targets but it could also undermine the purpose and function of the scheme.

4 What is included in your administration fee?

- Provision of guidance via telephone helpline and website
- Provision of documentation (registration packs etc)
- Provision of guidance notes. *vis*:
 - Introduction to CCAs
 - What is eligible to be in a CCA?
 - How do I set up a CCA?
 - Claiming the CCL discount
 - CCA energy and carbon conversion factors

- Charges
- Reporting changes
- Managing and Maintaining your CCA
- Reporting target period data
- Metering and Measuring requirements
- Audits
- Glossary of CCA terms
- Assistance for new entrants in preparing and submitting CCA applications forms
- Assistance with variations and help with submitting variations
- Collection of annual energy and production data to assess performance against targets
- Guidance and support to companies regarding performance against targets (eg how to pay buy-out fees)
- Submission of target period performance information to the Environment Agency
- Environment Agency fees, payable per site, annually

5 Contacts and links

- CCA helpline telephone: 0845 600 8122
- Email: techuk@cclevy.com
- Website (coming shortly): www.cclevy.com
- techUK contacts:
 - Emma Fryer, Associate Director, Climate Change Programmes
Emma.fryer@techuk.org Tel: 020 7331 2160 Mob: 07595 410 653
 - Alec Broadhurst, Programme Executive, Tech for Business
Alec.broadhurst@techuk.org Tel: 020 7331 2018