

# IMPLEMENTATION OF THE QUALITEE BUSINESS MODEL IN SPAIN



# **QualitEE Project**

This document has been developed as part of the project titled "QualitEE – Quality Certification Frameworks for the Energy Efficiency Services" supported by the EU's Horizon 2020 programme.

The QualitEE consortium comprises 12 partner organisations covering 18 European countries, an expert advisory board, including the European standards body CEN/CENELEC, and 59 supporters from major financial institutions, government bodies, trade associations and certification bodies.

# Document type

Public

## Date

April 2020

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## Disclaimer

The QualitEE project receives funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No. 754017. The sole responsibility for the content of this document lies with the authors. It does not necessarily reflect the opinion of the European Union. Neither the EASME nor the European Commission are responsible for any use that may be made of the information contained therein.



# Contents

1 EXECUTIVE SUMMARY	4	
2 THE CASE OF SPAIN	6	
2.1 Description	6	
2.2 Phases of quality assurance scheme procurement	9	
2.2.1 Quality assessment criteria and compliance	9	
2.2.2 Evaluation of compliance and granting of the standard	10	
2.3 Main features	12	
2.4 Canvas analysis	13	
2.4.1 Business Model Canvas Analysis	13	
2.4.2 Value proposition	15	
3 IMPLEMENTATION STRATEGY	16	
3.1 Business opportunities	16	
3.2 Implementation strategy	18	
4 MARKETING STRATEGY AND ECONOMIC PLAN	20	
4.1 Target groups	20	
4.2 Cash flows	20	



# 1 EXECUTIVE SUMMARY

In order to achieve the objectives for 2030 and 2050, it is urgent to save energy and ensure that the energy consumed is of renewable origin. Therefore, the development of processes and services with greater energy efficiency and sustainability that integrate forms of renewable self-consumption is, without a doubt, a crucial part of meeting the decarbonization calendar.

Hence, it is important to highlight the relevant role played by energy efficiency services (EES), which can help obtain financial savings, reduce users' carbon footprint or increase energy security among other. EESs, however face different barriers that hinder the development of their market, among which one is the lack of trust among users. Because of this, in the scope of the QualitEE project, business cases for quality assurance schemes have been developed to help increase investment in energy efficiency services in the building sector within the EU and improve trust in service providers.

### Opportunities in Spain

In Spain the EES market has experienced a somewhat slow development. However, several opportunities were identified by a survey conducted by CREARA. For one, the weight of Spanish industry in the energy supply contract (ESC) market is significantly lower in Spain than in other European countries. This reality, together with the high industrial prices of electricity, offers a clear business opportunity for energy service companies. For this reason, it can be expected that municipalities, hospitals, educational centers and other public management entities will demand more energy performance contracts (EPCs) in the coming years.

Furthermore, the demand for EPC contracts by public administrations is expected to grow due to recent regulatory changes, in particular the decision by Eurostat to not count as deficit the investments made by public administrations in energy efficiency. Furthermore, it is important to add that the lower costs of the technology and the recovery of the photovoltaic self-consumption market, adjacent to that of energy efficiency, provide a perfect scenario for the economic recovery of the sector.

On the other hand, in the industrial sector, the number of energy supply contracts is very low in Spain compared to the European average. Less than 20% of the companies surveyed have industries among their clients. This is therefore another business opportunity. In this sense, the increase in the price of energy will favor the demand for the improvement of energy efficiency in industrial installations.

The survey also analyzed the main barriers for energy service companies to sign Energy Performance Contracts (EPC) and Energy Savings Contracts (ESC). Among the most significant were administrative barriers and the scarcity of standardized Measurement and Verification practices, as well as a lack of trust. In order to improve this lack of confidence, it would help to have official certification of energy efficiency services in Spain.

As a conclusion of the study: a **quality assurance scheme** applied to energy services would have greater added value in Spain than in other European countries. The QualitEE project will help meet this objective by creating a system for certifying the quality of services offered by Energy Service Companies in Europe.

Taking this into account, the quality assurance scheme situation in Spain was analyzed, and two certificates were identified: an Energy Savings Company (ESCO) label granted by ANESE and a UNE Standard. Because the market is still rather small, an additional assurance scheme would oversaturate the market, so it was decided that the best option would be to include the quality criteria created in the QualitEE project in the existing UNE Standard. This idea was presented to representatives of the committee that designed the Standard, who believed the criteria could be



fitting, however no concrete plans have been made as to how to proceed for their implementation, and plans have been halted because of the COVID-19 crisis.

Promoted by the sector itself, the UNE 216701 Standard aims to contribute to the deployment of energy services in Spain, improving transparency and reliability in their procurement. It defines a classification of energy service providers (ESP) that allows for their differentiation and the choice of the most appropriate type for the customer's needs. It is also based on the applicable legislation, taking the same definitions and making the different figures currently existing in the regulations compatible.



# 2 THE CASE OF SPAIN

# 2.1 Description

More and more companies are basing their activity and business on energy efficiency, as is the case with ESCOs whose projects are based on efficient and energy-saving installations. In Spain, ESCOs that look to implement efficient projects need to overcome a number of obstacles such as: the adequacy of funding, the complexity of contracts, the bureaucracy of many procedures, the lack of government support, the difficulty of obtaining accurate information, the lack of reference companies, mistrust by the client, the low tendency to outsource energy management and the lack of tax subsidies among others but that, although slowly, is they're getting better and better<sup>1</sup>.

In the scope of the QualitEE project, which aims to increase investment in energy efficiency services in the building sector within the EU and improve trust in service providers, several surveys where conducted to understand the state of the market across Europe. The results of the survey revealed positive attitudes towards the development of the EPC market in the continent. The majority of respondents (57%) reported that their national EPC market had grown in the past 12 months, with 16% of respondents describing significant growth (6% and more) and 41% of respondents describing slight growth (1% to 5%). The results obtained in 2019 were more positive compared to the 2017 survey, where only 14% of respondents reported significant growth and 39% described slight growth.

In Spain, as complexity and lack of trust in the ESCO industry are identified as the main market barriers, providing better information and higher quality services could be expected to increase customer confidence and demand. Furthermore, 100% of respondents to the Project find it difficult or very difficult to obtain viable funding, 63% of respondents believe that there is always, or most of the time, mistrust of energy efficiency service providers and 90% of respondents find that a quality assurance scheme would increase customer confidence in ESCOs.

According to a study conducted by the Spanish National Association of Energy Services Companies (ANESE) in Spain, energy services as a whole make up a market that was estimated to have grown from 1.17 billion euros in 2015 to 1.18 billion euros in 2018. While 60% of ESCOs declared a turnover of less than 2.5 million euros, 20% invoiced more than 10 million euros. Furthermore, over the period 2015-2018, the number of SMEs billing between 5 and 10 million euros increased by 6%, while the number of SMEs billing between 2.5 and 5 million euros decreased by another 6%. Lastly, ESCOs provide an average saving of 30%, reaching average economic savings of 242000 euros per project and avoiding a total of 64,300 tons of CO<sub>2</sub>. All in all, the market has room to grow, while still showing signs of lagging behind due to the barriers faced.

In Spain, there are two certificates which classify ESCOs; a UNE standard and an ANESE label. Because the ESCO market in Spain is still relatively small, the success of said certification has been limited, with under 100 companies certified. Because of this, it was soon realized that there was no room for an additional scheme such as QualitEE's.

**ANESE** launched the first certified classification of energy services companies (ESCOs) in the country. This classification responds, on the one hand, to the lack of regulation and to the absence of an

<sup>&</sup>lt;sup>1</sup> ANESE, 2019. Observatorio De Eficiencia Energética - El Mercado De Las Empresas De Servicios Energéticos. Madrid.



official registry; and on the other, it has the purpose of providing the client with an understanding of the ESCO model.

The ANESE label is aimed at companies that offer energy services following the savings guarantee model and want accreditation to demonstrate their experience, training, technological possibilities and technical potential. Through this certificate they can distinguish themselves through an accreditation that assures their professionalism.

ANESE offers two types of certificates: one for companies that have not yet implemented any projects following the ESCO model, but are prepared to do so, called "ESE" and another certificate for companies that can prove (with evidence) that they have worked following the ESCO model. In this case, the certificate issued is called "ESE PLUS".

ANESE uses an independent certifier; TÜV Rheinland, to oversee the audits to certify that the ESCOs applying for certification comply with the requirements. A technical committee of ANESE review the auditor's report and approve the classification.

The second existing certification in Spain is the UNE 216701:2018 Standard. The objective of the new UNE 216701:2018 Standard is to establish a typology of energy service providers according to the types of actions they perform. In addition, the standard includes minimum requirements for technical capacity and experience that will allow customers to be sure of the quality and good performance that they have had to expect from the ESCO in the absence of an agreed reference framework.

This Standard, which replaces EA 0055, complements the legislation in force, contained in Directive 2012/27/EU and its transposition into RD 56/2016, which regulates the figure of the provider of energy services, further developing this key figure for achieving energy efficiency objectives.

The initiative was promoted by the sector itself and was developed in a working group in which a total of 14 sector associations representing different actors related to the energy services market participated. The standard was drawn up by the Spanish Standards Association, UNE, with the joint participation of numerous associations in the sector, and has been promoted by AMI (Association of Integral Maintenance and Energy Services Companies); ADHAC (Association of Heating and Cooling Network Companies); ATECYR (Spanish Technical Association of Air Conditioning and Refrigeration) and A3E (Association of Energy Efficiency Companies).

The definitions on which the standard is based have been taken from the different legislative texts that are applicable in order to favor their complementarity. In addition, the same energy service provider may belong to several of the established types of energy service providers (ESP).

It establishes three types of energy service providers according to their types of action:

- The audit and consulting ESP, includes energy service providers that carry out energy audits, consulting, engineering or energy efficiency projects that must be carried out in accordance with existing technical standards (UNE-EN ISO 50001 [1], UNE-EN ISO 16247 [2], etc.)
- The operating ESP, which groups together providers of energy services that provide maintenance, operation or control tasks for any type of energy-consuming facility, building or industry
- The investment PSE, which comprises providers of energy services that perform the energy services of an Energy Services Company (ESCO) as defined in Royal Decree Law 6/2010 [3], i.e., that include investment in works, supplies or intangibles and link payment for these services to the energy savings achieved.



As mentioned earlier, the Spanish market is oversaturated with certification schemes. The proposition made in the scope of the QualitEE project is for the QualitEE technical criteria (QC) to be added to the UNE Standard 216701:2018 in later revisions, as the ultimate goal of the scheme is to include a quality aspect which would be covered by the QC. It is important to highlight that this process is still at a very early stage, and the certification is still a work in progress.



# 2.2 Phases of quality assurance scheme procurement

### 2.2.1 Quality assessment criteria and compliance

The quality criteria presented below have been developed within the QualitEE project and are based on "preliminary quality criteria for energy efficiency services" developed for the Austrian market within the Transparense project.

This comprehensive set of technical, economic, communicational, and other criteria has been defined to be applied on energy efficiency services, with special focus on "Energy Performance Contracting" (EPC) and "Energy Supply Contracting" (ESC) in order to ensure minimum quality requirements which all services must comply with to be labelled as high-quality services.

The quality criteria selected have been object of discussion among stakeholders at both, national and European levels. Consequently, the feedback has been incorporated allowing us to present an extended and agreed set of criteria. These criteria are:

- QC1 Adequate analysis: the analysis of an energy-consuming unit (building, industrial establishment, facility, etc.) with respect to possible energy savings including the identification of possible energy efficiency improvement (EEI) measures is often the first step in an EES. The quality of analysis will thus, also have an enormous impact on the overall quality of EES.
- QC2 Quality of implementation of technical energy efficiency improvement measures: In many cases, the rendering of an EES is connected with the implementation of technical measures. A broad spectrum of quality standards can be met in practice while rendering services in this respect. QC2, therefore, stipulates a range of quality standards that must be complied with when implementing technical measures. In the process, compliance with such standards that regulate the implementation of technical measures is of paramount importance. Moreover, it must be ensured that the operator of the facility will be in a position to operate the newly installed facilities after the end of the project.
- QC3 Savings guarantee: some EES come with the promise that savings of a specific size will be realized. Such promises routinely known as savings guarantee must meet specific requirements for them to truly be beneficial to the client.
- QC4 Verification of energy savings: The identification and/or implementation of energy savings is at the center of EES. For this reason, the quality of an EES is also determined by the way that energy savings are verified. Energy savings cannot be measured directly but are always calculated. In simple terms, three approaches are differentiated:
  - Verification based on measured energy consumption: even in places where measurement equipment is available for the purpose of recording energy consumption, energy saving is determined through the comparison of the current value with a reference consumption (frequently called a "baseline"). At the same time, factors impacting energy consumption that are not caused by EES must be "filtered out" (often referred to as an "adjustment process" e.g. for the impact of variations in weather conditions);
  - Engineering calculation of energy-savings: usage of complex methods of calculation and simulation largely based on standards;
  - Expert estimation: derivation from savings realized from similar and comparable cases.
- QC5 Value retention and maintenance: some EES also cover services relating to the maintenance and repairs of newly installed or existing facilities. Quality of these services has a direct influence on the availability of the (energy) system and retention of its value. As these factors ensure desired



benefits and long-term sustainability of projects beyond the contract duration, they also influence the overall quality of the EES.

- QC6 Communication between the contractor and the client: In addition to technical quality, the type and scope of communication between the EES provider and the client contributes to the quality of EES. EES providers assume only partial responsibilities from existing operating personnel. To avoid problems in the implementation of the EES the interfaces between contractual parties must be effectively managed through continuous and well-defined communication.
- QC7 Maintenance of users' comfort: The execution of EES shall not lead to any impediment on the comfort of the user. In this context, users' comfort requirements can be assessed either through physical parameters (temperature, air quality, luminous intensity, etc.) or captured by collecting feedback via a comfort survey tool.
- QC 8 Information and motivation of users: Since in most cases, users have a considerable impact on the energy consumption of an object and thus, also influence the success of EES, selected EES approaches entail actions for the information and motivation of users.
  - Taking into account the heterogeneity of user-information activities, QC 8 contains just a "minimum package". In real EES projects, however, it may be advisable to extend user-information activities beyond the minimum requirements as included in QC 8.
- QC9 Comprehensible contractual stipulations for the contracting of specific regulatory requirements: several years of experience in contracting projects, have shown that their quality is not just of a technical and communicative nature but that the shaping of the Contract also contributes decisively to the quality of a project. The Contract must contain regulations for individual issues such as ownership transfer, handling of energy price risk, insurance or exit regulations, that will repeatedly lead to problems in practice, if they were not regulated.

### 2.2.2 Evaluation of compliance and granting of the standard

Once standards have been approved, as is the case with the UNE standard, companies can contact the National Certification Organizations to seek said UNE certificates. These are the steps to be followed:

- Companies looking to get certified contact National Certification Organizations with a request
- An initial audit to evaluate if there is compliance with the standard is conducted
- The type of certificate to be given is considered (type of ESP)
- A corrective plan of action is implemented if there are compliance issues
- An evaluation and decision is carried out
- If requirements are met, the certificate is issued

The provider of a product, process or service that meets the requirements defined in the standard or technical specifications thus demonstrating this certification and constituting a differentiating element in the market, improves the image of products and services offered and generates trust between customers and consumers.

Under the present UNE Standard's business model, it is not the service that gets certified, and the focus is on process and procedure standardization rather than quality. The classification method involves the accreditation of public or private contracts that include these actions and is admitted as an alternative to other types of accreditation of the execution of these actions.



In addition to the ESP classification (see 2.1), the standard establishes different categories within each type of ESP according to their experience, scope of action and qualified resources. To this end, it establishes three levels based on aspects such as the energy service provider's invoicing, the economic amount of its contracts, the average number of professionals dedicated to energy services or the autonomous communities in which it has worked.

An "inexperienced" category is also included to accommodate ESPs entering the energy services market and to encourage the evolution of their skills towards better coverage of customer needs. The result has been a consensus-based classification of energy service providers that is accepted and supported by most of the sector's associations, and which is a tool for generating confidence in the possibilities offered by energy services.

With the inclusion of the QualitEE QC (see 2.2.1), the control procedures would have to be modified to include the additional criteria, which would allow for the assessment of the quality of the projects implemented by ESPs. This would be done through random audits of the portfolio of projects executed by the companies, once a year.

**UNE Standard** QualitEE **Energy audit ESP for Auditing** Consulting and Energy Engineering Consulting **EE** projects Maintenance TECHNICAL **Exploitation Exploitation ESP QUALITY CRITERIA** Control Intangible investments, works or supplies **Investment ESP** Must face a certain degree of economic risk (ESCO) through an energy performance contract

Figure 1 – Overview of the UNE Standard

Source: CREARA Analysis



# 2.3 Main features

The main features of the QualitEE business model are found in the following table:

Table 1 - Main features for the quality assurance scheme in Spain

	UNE Standard		
Included in Scheme nº	Standardization by a private organization		
Principal action	Certificate		
Scope	National		
Туре	Voluntary		
Target user	ESCOs		
Authority	UNE/ AENOR		
Phases	<ol> <li>Proposal stage</li> <li>Preparatory stage</li> <li>Committee stage</li> <li>Enquiry stage</li> <li>Approval stage</li> <li>Publication stage</li> <li>Application to certificate via national certification organizations</li> <li>Evaluation and compliance</li> <li>Issue of the certificate</li> </ol>		
Stakeholders	<ol> <li>Standard proposers</li> <li>Expert work groups</li> <li>Technical Committee</li> <li>Technical Sub-committee</li> <li>UNE</li> <li>AENOR</li> <li>National certification organizations</li> <li>ESCOS</li> </ol>		
Support measures/ dissemination	National recognition, informative events, media access, conferences, National Certification Organizations.		
Year of implementation	2018		
Costs	Usage fees, subscriptions of members, revenues from reports		

Source: CREARA Analysis



#### 2.4 Canvas analysis

#### 2.4.1 **Business Model Canvas Analysis**

#### Table 2 - Canvas analysis

#### **KEY PARTNERS**

- Standard proposers: those interested in the creation of new certificates (companies, governments, experts, etc.)
- Experts and working groups: the collectives that establish and go through the processes of creating new standards, in unison with the technical committees and sub-committees
- Technical committees and sub-committees
- AENOR: the entity in charge of standardization processes at national level
- National certification organizations: the entities in charge of certification processes at national levels
- EES providers: EPC providers, consultancy, supply contracting, operational contracting, etc.
- Client: natural or legal entity interested in implementing EE measures

#### **KEY ACTIVITIES**

- Through its quality assessment it defines if an EES meets the prerequisites to obtain their label, and deem them to be a highquality efficiency service
- Development of voluntary national standards facilitating trade by providing common standards
- Publishes technical reports, technical specifications, publicly available specifications, technical misprints, and guide
- Aid in the creation of products and services that are safe, reliable and of good quality.

### **KEY RESOURCES**

- Brand and patent
- Human capital (technicians, sales staff, etc.)
- National standardization and certification organizations
- Expert committees
- Broadcasting capacities

#### VALUE PROPOSITION

- Easy to perform due to predetermined steps
- Objective criteria established by an external international consortium
- International recognition
- The standard helps businesses increase productivity while minimizing errors
- The standard serves to safeguard consumers and the end-users of products and services, ensuring that certified products conform to the minimum set standards
- Endorsement by national standardization organizations and other relevant entities

#### **CUSTOMER RELATIONSHIP**

- Proposers of new standards contact **AFNOR** representatives in their countries
- Companies that wish to get certified contact certification organizations

#### CUSTOMER **SEGMENT**

- Standard proposers (experts, companies, governments, national standardization organizations etc.)
- Financial institutions as prescribers of the certificate
- Beneficiaries of implementation of the standards (mostly companies)
- National standardization and certification organizations

### **CHANNELS**

- Awareness:
- Evaluation: technical
- Purchase and delivery: via certification

- website, exposure
- committees
- organizations
- After sales: exposure, website publishing

#### **COST STRUCTURE**

## **REVENUE STREAMS**

- Sale of standards
- Certification costs are estimated at EUR 5,000-50,000



- Fixed costs: employees' salary (sales staff, software developers and other human resources), servers, marketing
- Variable costs: expenses that stem from standardization processes (on-site market research, external hires, working groups, etc.)

Source: CREARA Analysis



# 2.4.2 Value proposition

Table 3 - Value proposition of QualitEE in Spain

PROVIDER OF THE C	ERTIFIED EE SERVICE	CLIENT OF THE CE	RTIFIED EE SERVICE
SERVICES	GAIN CREATORS	GAINS	CUSTOMER JOB(S)
The project is developed following QualitEE criteria.  Solution development according to UNE standard  Provision of the label under one of three categories	Improve image by offering a quality service with preestablished guidelines by an independent association  Help reduce energy costs  Reduces impact on environment	Improve energy service quality  Reduce energy and CO <sub>2</sub> consumption  Minimize financial and technical risks:  Increase profitability of the business  Implementation of methods recognized internationally  Better public perception	Run profitable business (reducing costs by maintaining operation equal)  Have functioning  Improve energy efficiency in their business.  Improve image by being more environment friendly  Increase productivity minimizing errors
PA	PAIN RELIEVERS	PAINS	minimizing errors
	Minimize financial and technical risks by following criteria.  Most of the financial obligations and timeliness are met by the ESP.  Specificity of the requirements  International recognition	Influence on core business  Need for resources for non-core activities  Lack of time and resources for business  Upfront investment costs  High certification costs  High level of bureaucracy	

Source: CREARA Analysis



# 3 IMPLEMENTATION STRATEGY

# 3.1 Business opportunities

In Spain, and as has been mentioned before, there are two existing schemes that certify energy service providers in the country, however they have not had the expected impact and interest from companies. Nonetheless, in the scope of the QualitEE project, when asked "to what extent would a quality assurance scheme increase client trust in energy efficiency services and providers?", therefore tackling on the main existing barriers in the market, 90% of respondents answered that it would have major or moderate increase. When compared to the opinion of ESCOs across Europe, the effects of a quality assurance scheme are seen as more impactful in Spain than in the rest of the countries analyzed.

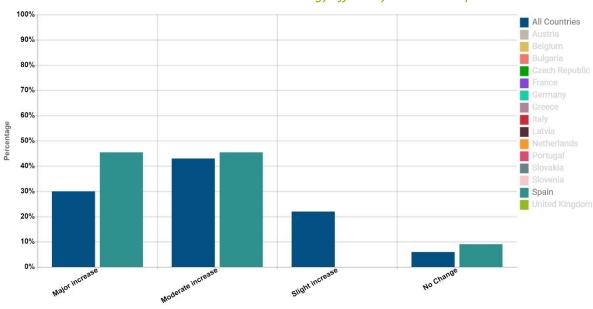


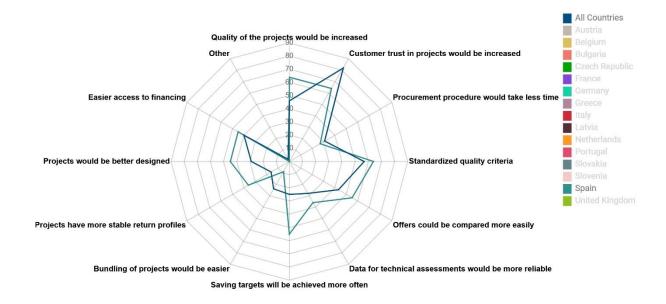
Figure 2 – European and Spanish responses to the question "to what extent would a quality assurance scheme increase client trust in energy efficiency services and providers?"

Furthermore, when enquired about the added value of quality assurance schemes, standardized quality criteria were identified by 64% of Spanish respondents. Because of this, an opportunity was identified in unifying the UNE Standard 216701 and QualitEE's QC, as the UNE Standard 216701 allows the user of the energy service to identify the type of PES most appropriate to his needs, contributing to greater transparency and reliability when contracting these services, using standardized criteria. This regulatory document establishes a typology of energy service providers according to the type of actions they perform and, within each type, a categorization according to their resources and experience.

In addition, the Standard covers both PES providers that carry out small-scale activities and entities and groups of companies that carry out large-scale investments. It also includes a zero category for those PES that do not yet have experience.



Figure 3 – European and Spanish responses to the question "what would be the added value of a quality assurance scheme?





#### 3.2 Implementation strategy

The process of drafting a UNE standard is subject to a series of phases that ensure that the final document is the result of consensus, and that any person, even if they do not belong to the working body that drafts it, can issue their opinions or comments.

The work is officially started with the consideration of the project, by means of an agreement of the Committee notified to AENOR. Once the final text has been approved by the Technical Committee of Standardization, AENOR processes the public information (PI), which is published in the Spanish Official Bulletin (BOE). Any person or entity may submit observations to the projects. Once the PI process has been completed and the comments received have been resolved, the standard can be published.

To ensure transparency, a reference (code and title) of all UNE draft standards is published monthly in the BOE, both at the time the work begins (consideration) and during the public consultation phase, as well as in its final publication.

In summary, the steps followed for the development are:

- Proposal stage
- Preparatory stage
- Committee stage
- Enquiry stage
- Approval stage
- Publication stage

Figure 4 – Implementation process of a UNE Standard

NATIONAL STANDARDIZATION AND **TECHNICAL COMMITTEE** DESCRIPTION OF THE PROCESS UNE sets criteria for the Standards must respond Experts form a technical Companies that wish to get

- creation of new standards
- to:
- A need in the market Global expert opinion
- Multi-stakeholder process
- Consensus from stakeholders
- committee responsible for specific subject area develop a standard draft
- The draft is then shared for commenting and discussion
- The draft is voted on
- If an agreement is reached, the standard is published. Otherwise, it is modified and voted on again
- Standards are implemented in countries by national standardization and certification organizations
- certified contact their national certification organizations
- Initial audit to evaluate if there is compliance with standards is conducted
- A corrective plan is implemented if there are issues with compliance
- An evaluation and decision is carried out
- If requirements are met, the certificate is issued

Because the Standard already exists, the implementation strategy is dependent on the addition of the QualitEE QC. The process to be followed would include a meeting of the subcommittee to discuss the QC to be implemented, which would then be published for stakeholders to comment on. Once feedback has been received, the subcommittee can process the changes



and update the Standard. Because of the COVID-19 crisis, the presentation of the QC in front of the subcommittee by CREARA has been postponed indefinitely.



# 4 MARKETING STRATEGY AND ECONOMIC PLAN

# 4.1 Target groups

Within the standard, there is room for the whole range of **suppliers** that are present in this sector, from consultancy work to those companies that act as Energy Service Companies (ESCOs) undertaking investment projects.

The user can obtain information on energy service providers according to the type of service to be provided, and in each of the typologies a categorization based on the company's resources, as well as its experience. This means that the user can find out which type of energy supplier best suits the needs of his or her activity, and this can ensure quality in the work to be contracted.

## 4.2 Cash flows



INCOMES				
FROM WHERE?	WHEN?	FROM WHOM?	METHOD	ТҮРЕ
Application fees	Before	Client	Percentage of the total cost of the project	Payment per quality criteria
Subscription/membership fees	During	ESCOs		Payment for all quality criteria
Evaluation fees	After	Government	Set amount	at once
Implementation fees		Association		Payment installments per
Certification fees				quality assurance phases
Usage fees				Payment in full of all phases
Bidding fees				
Auditing fees				

Source: Creara Analysis







Source: Creara Analysis

# 5 CONTIGENCY PLAN

# 5.1 Identification of potential risks

An analysis of the potential risks is summarized below in the table below. As can be observed, the risks associated to the scheme are only somewhat relevant are technical. This is because as the technical QC are still to be added, their implementation may hinder the development of the quality assurance scheme, since they must be considered by stakeholders who will judge how fitting they are in the Spanish context and propose further changes.

Table 4 - Potential risks

Type of risk	Risk	Likelihood	Impact
Technical	A	Medium	Medium
Financial	В	Low	Low
Management	С	Low	Low
Legal status	D	Low	Low