EECA 2024 EnMS STARTER PACK

C1 · GAP ASSESSMENT

EECA EnMS Gap Assessment Checklist

Score your energy management system against GP/ST/No.46/2024 and the statutory duties of Act 861 — before the Commission does

A self-scored assessment of your organisation's position against every required element of the Guidelines on Energy Management System [GP/ST/No.46/2024] and the statutory duties of the Energy Efficiency and Conservation Act 2024 [Act 861] and its Regulations — with the citation for every row, an ISO 50001:2018 alignment reference, and a readiness band at the end.

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INV-ENMS-C1	1.0	29 July 2026	Innovast Sdn Bhd	Anslem Lim, CEO

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DRAFT FOR ADAPTATION — this template is not regulatory advice. Prepared with reference to GP/ST/No.46/2024 (Guidelines on Energy Management System), the Energy Efficiency and Conservation Act 2024 [Act 861] and the Energy Efficiency and Conservation Regulations 2024 [P.U.(A) 466/2024]; sources last verified 18 July 2026. Adapt every field to your organisation before use. Only Suruhanjaya Tenaga can determine compliance with the Act.

Innovast Sdn Bhd

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CONTENTS

1 How to score

Work through the eight sections with the people who actually hold the evidence — typically the registered energy manager (REM), the facility or engineering lead, and whoever owns regulatory compliance. For each row, mark exactly one box:

Score	Meaning
Yes — 2 points	The requirement is met now and you could show the evidence today (document, minutes, record, dated data).
Partial — 1 point	Something exists but it is incomplete, out of date, undocumented, or has never been through the required approval.
No — 0 points	The requirement is not met, or nobody can say where the evidence is.

Score on evidence, not intention. "The policy is being drafted" is a **No**. "The Committee met twice this year against the required four" is a **Partial**. If two people disagree on a row, score the lower answer and note why.

Column key: **Citation** = the Malaysian legal or guideline source for the row (Act 861; P.U.(A) 466/2024 regulations; GP/ST/No.46/2024 "GP46"; GP/ST/No.45/2024 "GP45"; GP/ST/No.47/2024 "GP47"). **ISO** = the broadly corresponding ISO 50001:2018 clause, shown for organisations mapping this assessment onto an existing or planned ISO 50001 system. The EECA requirements govern; ISO alignment does not substitute for them.

2 S1 — Statutory position — designation, REM and the compliance clock

Rows in this section are statutory duties under Act 861 and the EEC Regulations 2024 — they carry direct penalties and are unique to the Malaysian regime (no ISO equivalent for most).

ID	Requirement	ISO ref	Score
S1-01	The organisation knows its designation status: it has received Suruhanjaya Tenaga's written notice under s.3(3), or has self-assessed its 12-consecutive-month energy consumption against the 21,600 GJ threshold. *Act s.3(1)(a), s.3(3); reg 3*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S1-02	A registered energy manager (REM) was appointed within three months from the date of the s.3(3) written notice. *Act s.5(1); reg 4(2) — penalty s.5(3): fine up to RM50,000*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S1-03	The REM route is documented: internal employee appointment (reg 4(1)) or external appointment (reg 6(1)). If external: the three-year expiry date (counted from the s.3(3) notice date) is diarised and an internalisation plan exists (reg 6(4)). *regs 4(1), 6(1), 6(4)*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S1-04	The REM's qualification tier matches the consumption band: 21,600–50,000 GJ → REM meeting reg 14; above 50,000 GJ → REM meeting subregulation 14(2) or (3). *reg 5(a)–(b)*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S1-05	REM workload caps are respected: an internal REM serves no more than 7 other energy consumers that are related corporations (reg 4(4)); an external REM serves no more than 7 other energy consumers (reg 6(3)). *regs 4(4), 6(3)*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S1-06	The Commission was notified of the REM appointment by electronic means. *regs 4(3), 6(2)*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S1-07	The REM vacancy protocol is known and assigned: notice to the Commission within 14 days of the office falling vacant; internal replacement within three months (external fallback only with the Commission's written approval). *reg 7(1)–(3) — penalty for late/no vacancy notice (reg 7(1)): reg 7(4), fine up to RM10,000*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S1-08	The EnMS development deadline is diarised: one year from the date of the REM appointment under reg 4(1) or 6(1). *Act s.6(1); reg 8 — penalty s.6(3): fine up to RM50,000*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S1-09	The first EE&C report deadline is diarised: within 30 days after the expiry of one year from the date of the REM appointment; the annual cycle thereafter is tracked — each subsequent report within 30 days after each successive appointment anniversary, per the GP45 Figure 1 submission timeline. *Act s.7(2); reg 9(a)–(b); GP45 para. 3.2 Fig. 1 — penalty s.7(4): fine up to RM50,000*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________

ID	Requirement	ISO ref	Score
S1-10	The energy audit cycle is tracked: registered energy auditor appointed (s.8(2)); first audit report submitted within one year of the s.3(3) notice, then on the fifth year for every five years; any exemption application window (first three months of the fifth year) is diarised. *Act ss.8–9; reg 10 — penalties: s.8(4) (no REA appointed) and s.9(10) (report not submitted), each a fine up to RM50,000*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
	Section subtotal (max 20)		________

3 S2 — Commitment and governance (GP46 para. 4.2–4.3)

ID	Requirement	ISO ref	Score
S2-01	Top management commitment is documented, covering its GP46 responsibilities: review and endorse the EnMS boundary, energy policy, objectives/targets and EEI; allocate human and financial resources; endorse M&V implementation; communicate the importance of energy management; consider energy performance in long-term planning; conduct management review. *GP46 para. 4.2(a)(i)–(ix)*	5.1	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S2-02	A management representative has been appointed from among top management (or the CEO) to oversee EnMS implementation, with authority to make energy management decisions. *GP46 para. 4.2(b)*	5.1/5.3	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S2-03	An Energy Management Committee is established with multi-department representation (EHS; utility/facility/engineering O&M; production for industry; procurement and finance; human resource; administration). *GP46 para. 4.3(a)*	5.3	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S2-04	Committee duties are defined and discharged: energy policy preparation, EnMS self-evaluation, internal performance review, action plan, awareness/campaign/training, procedures approval, EnMS monitoring, M&V oversight, target revision. *GP46 para. 4.3(b)(i)–(ix)*	5.3	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S2-05	The Committee meets not less than four times a year; minutes are recorded and endorsed by the management representative. *GP46 para. 4.3(b); GP47 para. 3(c)(ii)–(iii)*	— (ST is more specific)	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S2-06	The REM assists the Committee per the defined functions: objectives and targets, resources, EEI selection, internal performance review, data collection plan, action plan execution, opportunity identification, M&V for reporting savings. *GP46 para. 4.3(c)(i); Act s.5(2); GP47 para. 3*	5.3	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S2-07	Human and financial resources for the EnMS are allocated and reflected in budgets. *GP46 para. 4.2(a)(iii)*	7.1	☐ 2 ☐ 1 ☐ 0 Evidence: ________
	Section subtotal (max 14)		________

4 S3 — Energy management policy (GP46 para. 4.4)

ID	Requirement	ISO ref	Score
S3-01	The energy management policy contains the four mandatory commitments: (a) continual improvement of energy performance through an action plan; (b) provision of information, data and resources; (c) compliance with any other written law; (d) support for energy-efficient products and services in new, retrofitted and renovated facilities where economically feasible. *GP46 para. 4.4.1(a)–(d)*	5.2	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S3-02	The policy is documented, implemented and promoted throughout the organisation. *GP46 para. 4.4.2*	5.2/7.3	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S3-03	The policy is regularly reviewed against energy management performance and kept up to date. *GP46 para. 4.4.2–4.4.3*	5.2/9.3	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S3-04	The policy is signed by the current top management. *GP46 para. 4.4.3*	5.2	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S3-05	The policy is displayed in a conspicuous part of the premises, visible to all staff and employees. *GP46 para. 4.4.4*	— (ST is more specific)	☐ 2 ☐ 1 ☐ 0 Evidence: ________
	Section subtotal (max 10)		________

5 S4 — Planning — assessment, data, baseline and targets (GP46 para. 5)

ID	Requirement	ISO ref	Score
S4-01	An EnMS self-evaluation using an energy management matrix (policy; organisation; communication and motivation; monitoring and targeting; promotion, awareness and capacity; finance and budget) was conducted at Committee formation, is documented, and is re-assessed periodically. *GP46 para. 5.2.3(a)*	— (EECA-specific instrument)	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S4-02	An internal EnMS performance review is conducted as the basis for self-declaration of conformity across the EnMS components, generating improvement opportunities and responding to non-conformity. *GP46 para. 5.2.3(b)*	9.1/9.2	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S4-03	The EnMS boundary is defined and covers the whole facilities of the energy consumer. *GP46 para. 5.2.4(a)*	4.3 (ST is stricter — no scope carve-outs)	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S4-04	Significant Energy Uses (SEUs) are identified by quantifying the energy consumed by facility, process or equipment. *GP46 para. 2 (SEU), para. 5.2.4(a)*	6.3	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S4-05	An inventory of operation systems, mechanical and electrical services, production processes and equipment is maintained. *GP46 para. 5.2.4(b)(i)*	6.3	☐ 2 ☐ 1 ☐ 0 Evidence: ________

ID	Requirement	ISO ref	Score
S4-06	At least twelve months of the most recent energy consumption data is collected — from utility bills at minimum, with submetering for individual SEUs where available. *GP46 para. 5.2.4(b)(ii); GP47 para. 3(a)(i)(B)*	6.3/6.6	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S4-07	On-site energy generation data (electricity kWh, chilled water RTh, steam tonnes, other) and variable data (operating hours, production volume, weather, occupancy) affecting consumption are collected. *GP46 para. 5.2.4(b)(iii)–(iv)*	6.3/6.6	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S4-08	An energy baseline is established using an EEI (SEC for industry; BEI for buildings) and/or regression analysis, with defined conditions for baseline revision. *GP46 para. 5.2.4(c)*	6.4/6.5	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S4-09	Energy benchmarking is performed — external (peer facilities or established standard values) or internal (against own baseline within 12 months or own targets). *GP46 para. 5.2.4(d)*	— (good practice; ISO 6.6 note)	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S4-10	Performance targets are established from the EnMS assessment and energy performance analysis (GP46 contemplates achievement within three years of establishment — "may", not "shall"). *GP46 para. 5.3.1–5.3.2*	6.2	☐ 2 ☐ 1 ☐ 0 Evidence: ________
	Section subtotal (max 20)		________

6 S5 — Action plan (GP46 para. 6)

ID	Requirement	ISO ref	Score
S5-01	Strategies are built on a gap review: EnMS self-evaluation findings, technical assessments and energy audit findings compared against targets. *GP46 para. 6.0(a)(i)*	6.2	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S5-02	Technical strategies are defined for closing the gaps — ESMs, energy management working procedures, operational guidelines, maintenance procedures. *GP46 para. 6.0(a)(ii)*	6.2	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S5-03	Capacity development is programmed: training, awareness programmes and campaigns, best-practice sharing. *GP46 para. 6.0(a)(iii)*	7.2	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S5-04	Each ESM in the action plan has a timeframe and estimated savings; prioritisation uses financial analysis (CBA, SPP, NPV, IRR or ROI). *GP46 para. 6.0(b)*	6.2	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S5-05	Each ESM has named owners with defined responsibilities (internal and external — consultants, contractors, vendors) and an estimate of cost and human resources. *GP46 para. 6.0(c)*	6.2/7.1	☐ 2 ☐ 1 ☐ 0 Evidence: ________
	Section subtotal (max 10)		________

7 S6 — Implementation (GP46 para. 7)

ID	Requirement	ISO ref	Score
S6-01	The progress of action plan implementation is documented. *GP46 para. 7.2*	6.2	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S6-02	Identified energy efficiency retrofits are implemented per the prioritised list from the action plan. *GP46 para. 7.3(a)*	8.1	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S6-03	Work procedures controlling energy use in operation are implemented — how to operate processes and equipment to operational criteria, and how to adjust control parameters to optimise energy use. *GP46 para. 7.3(b)*	8.1	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S6-04	The maintenance schedule is incorporated into energy monitoring work procedures, and measuring equipment is calibrated according to plan. *GP46 para. 7.4*	7.1/9.1	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S6-05	Work procedures exist for handling non-conformance and initiating corrective and preventive actions to minimise energy waste. *GP46 para. 7.5*	10.1	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S6-06	A proper M&V mechanism is established and conducted for each ESM project according to its M&V plan; the M&V plan, data collection and savings analysis are documented and archived. *GP46 para. 7.6*	9.1	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S6-07	A motivation strategy and a communication plan are implemented — platforms, frequency, target audiences, information to be delivered, and staff feedback channels (communication matrix). *GP46 para. 7.7–7.8*	7.4	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S6-08	Awareness and capacity-building programmes run for staff, top management and stakeholders, including training. *GP46 para. 7.9*	7.2–7.3	☐ 2 ☐ 1 ☐ 0 Evidence: ________
	Section subtotal (max 16)		________

8 S7 — Measuring progress and management review (GP46 para. 8)

ID	Requirement	ISO ref	Score
S7-01	A periodical internal EnMS review is implemented at least once a year to confirm the system is effectively implemented and maintained and achieves the policy, objectives and targets. *GP46 para. 8.2(b)*	9.1/9.2	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S7-02	Results are evaluated: achievements reviewed against previous EnMS assessments; energy efficiency analysed against the established EEI; benchmarking reviewed against baselines, targets and peers; ESM savings verified; staff awareness, knowledge and competency assessed. *GP46 para. 8.2(a), (c)–(f)*	9.1	☐ 2 ☐ 1 ☐ 0 Evidence: ________

ID	Requirement	ISO ref	Score
S7-03	Compliance with legal requirements is evaluated. *GP46 para. 8.2(g)*	9.1	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S7-04	A management review with top management is held at least once a year; the management representative presents the outcomes; minutes are recorded and endorsed by top management. *GP46 para. 8.3; GP47 para. 3(c)(iv)–(v)*	9.3	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S7-05	Top management decides the actions arising — policy implementation or improvement, energy targets, resources and strategies for continual improvement. *GP46 para. 8.3(a)–(c)*	9.3/10.2	☐ 2 ☐ 1 ☐ 0 Evidence: ________
	Section subtotal (max 10)		________

9 S8 — Reporting, documentation and the EE&C report

ID	Requirement	ISO ref	Score
S8-01	Reporting and documentation are maintained as an ongoing EnMS activity — policy, minutes, self-evaluation records, data collection plans, action plans, M&V records. *GP46 para. 3.4*	7.5	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S8-02	The EE&C report is prepared by the REM with the statutory content: description of the EnMS; total amount and purpose of energy and energy resources consumed; proposed EE&C improvement measures; measures implemented and yet to be implemented; any other information required by the Commission — in the GP45 structure. *Act s.7(1)(a)–(e); GP45 para. 4.1 — penalty s.7(3) (REM): fine up to RM20,000*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S8-03	EE&C report accuracy is verified: reported data compared with actual utility bills and invoices; supporting documents (maintenance records, equipment specifications, energy audit reports) examined for alignment with physical infrastructure and operations. *Act s.5(2)(e); GP47 para. 3(e)*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S8-04	The EE&C report is submitted to the Commission through the online system within the reg 9 window. *Act s.7(2); reg 9; GP45 para. 5 — penalty s.7(4): fine up to RM50,000*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
S8-05	Officer-level accountability is understood: on a body-corporate offence under the Act, directors, compliance officers, partners, managers and similar officers may be charged jointly or severally and are deemed liable unless the statutory defence is made out. *Act s.62*	—	☐ 2 ☐ 1 ☐ 0 Evidence: ________
	Section subtotal (max 10)		________

10 Your readiness band

Add the eight section subtotals. Maximum score: **110** (55 rows × 2). Convert to a percentage: total ÷ 110 × 100.

Total score	Band	What it means — and what to do next
94–110 (≥85%)	**Audit-ready**	Your EnMS is substantially in place. Priority: formalise the evidence trail so every Yes above survives scrutiny — minutes, endorsed policy, M&V records — and align the EE&C report data pack to GP45 before the reg 9 window.
66–93 (60–84%)	**Structured but exposed**	The framework exists but specific rows above are Partial or No. Close the flagged gaps in citation order (statutory rows first) before the reg 8 one-year deadline consumes your calendar.
39–65 (35–59%)	**Foundations missing**	Core elements are absent. Sequence: management representative and Committee → energy policy → data collection and baseline → action plan. The pack's templates C2, C3, C6 and C7 map to exactly these steps.
0–38 (<35%)	**Starting from zero**	With the reg 8 clock at one year from REM appointment, building an EnMS in-house from nothing is the high-risk path. An experienced external team compresses months of trial and error into weeks.

Whatever the band: rows scored No in **Section S1** come first. They are statutory duties with direct penalties and fixed clocks — everything else in the EnMS can be built in parallel, but a missing REM or an undiarised regulation 8 deadline compounds weekly.

11 What Innovast does with this

Bring us your scored checklist — or run the same assessment as a guided online wizard at **eeca2024.my** — and we will turn it into a sequenced compliance plan: which gaps close in which order, what each requires, and where the quick wins are. The first conversation is free and comes with a Level 1 desktop review of your position.

> **InnoSense — keep the score green all year.** InnoSense, Innovast's energy management platform, tracks your consumption, baseline and EnMS cycle continuously — so the next time you score this checklist, the evidence is already on file. Register interest at **eeca2024.my** · **anslem@innovast.asia**

The complete Starter Pack

This document is one of thirteen working documents in the EECA 2024 EnMS Starter Pack — together they stand up an energy management system that follows GP/ST/No.46/2024 and the statutory duties of Act 861.

Code	Document	Use it to
C0	Pack Guide & Compliance Clock	Orient the team; diarise the statutory deadlines
C1	**EECA EnMS Gap Assessment Checklist**	Score your current position (Yes / Partial / No) against every GP46 element and statutory duty; get a readiness band **(this document)**
C2	Energy Management Policy Template	Draft the policy with the four GP46-mandatory commitments built in
C3	Committee & Governance Kit	Appoint the management representative; constitute the Committee; run and minute the meetings and the annual management review
C4	Legal & Obligations Register	Hold every Act 861 / EECR duty with citation, deadline, penalty, owner and status — the legal-compliance evaluation GP46 para. 8.2(g) expects
C5	REM Appointment Checklist	Choose internal vs external appointment; respect the tiering and the caps; manage the three-year window
C6	EnPI / EEI Worksheet (sector-selectable)	Establish the baseline and indicator — SEC path for industry, BEI path for buildings
C7	Energy Data Collection Plan + 12-Month Consumption Tracker (xlsx)	Plan and record the twelve months of consumption, generation and variable data GP46 requires
C8	Action Plan & ESM Register (docx + xlsx)	Turn audit findings into a prioritised, costed, owned action plan with M&V per ESM
C9	Communication, Awareness & Training Plan	Discharge GP46 para. 7.7–7.9 — communication matrix, motivation strategy, training programme
C10	EnMS Self-Evaluation Matrix (xlsx)	Run the GP46 para. 5.2.3(a) maturity self-evaluation at Committee formation and periodically after
C11	Work Procedure & Log Sheet Starters	Seed the operational controls — chiller plant and lighting examples to adapt
C12	EE&C Report Skeleton	Assemble the annual report content in the GP45 structure before entering it in the Commission's online system

Get the complete pack, free: eeca2024.my/enms-pack · anslem@innovast.asia · +60 12 355 6214