EECA 2024 EnMS STARTER PACK

C5 · REM APPOINTMENT

REM Appointment Checklist

Internal vs external appointment under regulations 4–7 — the tiering, the caps, the three-year window, and the vacancy protocol

The registered energy manager is the first statutory appointment on the compliance clock — due within three months of Suruhanjaya Tenaga's written notice — and the anchor for the EnMS and EE&C report deadlines that follow. This checklist takes you through the decision, the qualification tiering, the workload caps, and the notifications, for both the internal and the external route.

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DRAFT FOR ADAPTATION — this template is not regulatory advice. Prepared with reference to GP/ST/No.46/2024 (Pind. 1/2026) (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.

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1 The decision: internal or external

The default rule is internal: regulation 4(1) requires appointment of a REM **from among your employees**. Regulation 6(1) provides the alternative: an external REM — not an employee of yours or of your related corporations — may be appointed **for a period not exceeding three years from the date of the s.3(3) written notice**. Immediately on expiry of that window, an internal REM must be appointed in accordance with regulation 4 (reg 6(4)).

	Internal REM (reg 4)	External REM (reg 6)
Who	Your employee, registered as an energy manager and meeting reg 14	A registered energy manager meeting subreg 14(2) or (3), not your employee nor a related corporation's
Duration	Open-ended (subject to registration and practising certificate)	Up to 3 years from the notice date — then internalise (reg 6(4))
Workload cap	May serve up to 7 other energy consumers that are related corporations of the appointer (reg 4(4))	May serve up to 7 other energy consumers (reg 6(3))
Notification	Notify the Commission electronically (reg 4(3))	Notify the Commission electronically (reg 6(2))
Fits when	You have (or can hire/train) a qualified engineer on staff; multi-site groups sharing one REM across related corporations	No qualified employee yet; you want the first compliance cycle run by a specialist while an internal candidate is developed

Plan the handover from day one. If you take the external route, the three-year window is also your internal-capability deadline: identify the internal candidate early, register them (see the Commission's Guide on Registration of Energy Manager), and let them shadow the external REM through at least one full EE&C reporting cycle.

2 Qualification tier — match the REM to your consumption

Your 12-month consumption	Required REM	Source
21,600 – 50,000 GJ	A registered energy manager who fulfils the requirements of regulation 14	reg 5(a)
Above 50,000 GJ	A registered energy manager who fulfils the requirements of subregulation 14(2) or (3)	reg 5(b)
External appointment (any band)	A registered energy manager who fulfils the requirements of subregulation 14(2) or (3)	reg 6(1)

Practical consequence: an external REM must hold the higher reg 14(2)/(3) qualification regardless of your band, and any consumer above 50,000 GJ needs that tier even internally. Verify the candidate's registration class and practising certificate on the Commission's public REM register before appointing.

3 Appointment checklist — internal route (reg 4)

☐	Confirm the s.3(3) notice date and diarise notice + 3 months as the appointment deadline. *reg 4(2) — penalty for no appointment: s.5(3), fine up to RM50,000*

☐	Identify the candidate among employees; verify registration and tier against your consumption band (Section 2) on the ST public register; confirm the practising certificate expiry date. *regs 4(1), 5, 14*
☐	If the candidate will also serve other group companies: list every other energy consumer served; confirm all are related corporations (Companies Act 2016 meaning) and the total does not exceed 7 others. *reg 4(4)*
☐	Issue the letter of appointment (adapt C3 para. 2 wording to the REM role); define the REM's s.5(2) functions and reporting line to the Committee. *Act s.5(2); GP47*
☐	Notify the Commission of the appointment by electronic means; file the acknowledgement. *reg 4(3)*
☐	Record the appointment date here — it anchors the reg 8 EnMS deadline and the reg 9 EE&C report cycle: _____ *regs 8, 9*
☐	Hand the REM the obligations register (C4) and the data collection plan (C7); the REM must collect and analyse at least twelve consecutive months of consumption data from before the appointment. *GP47 para. 3(a)(i)(B)*

4 Appointment checklist — external route (reg 6)

☐	Confirm the s.3(3) notice date. Compute and diarise BOTH clocks: appointment due at notice + 3 months; external window ends at notice + 3 years. *regs 4(2), 6(1)*
☐	Verify the external candidate: registration under subreg 14(2) or (3); practising certificate current; not your employee nor an employee of any related corporation. *reg 6(1)*
☐	Ask the candidate to declare every other energy consumer they currently serve — the cap is 7 others. Get the declaration in writing and re-confirm annually. *reg 6(3)*
☐	Contract for the engagement: scope = the s.5(2) statutory functions plus GP47 duties (Committee support, data collection plan, EE&C report preparation, M&V proposals); term ▮ the remaining reg 6 window; handover and internalisation obligations written in. *Act s.5(2); GP47; reg 6(4)*
☐	Notify the Commission of the appointment by electronic means; file the acknowledgement. *reg 6(2)*
☐	Record the appointment date (anchors reg 8 / reg 9): _____ Record the internalisation deadline (notice + 3 years): _____ *regs 8, 9, 6(4)*
☐	Open the internalisation plan: internal candidate named by _____; registration achieved by _____; shadowing through at least one EE&C cycle. *reg 6(4)*

5 Vacancy protocol (reg 7)

If the appointed REM vacates office for any reason:

Step	Duty	Clock
1	Serve notice to the Commission, in the form the Commission determines	Within 14 days of the office falling vacant — penalty reg 7(4): fine up to RM10,000
2	Appoint a replacement REM from among employees in accordance with reg 4	Within 3 months of the vacancy
3	If no internal appointment is possible: apply for the Commission's written approval to appoint an external REM (subreg 14(2)/(3)), on the Commission's conditions	Before the 3-month deadline expires

Note the asymmetry: the routine external route (reg 6) is only available against the three-year window from the notice; a mid-life vacancy replacement outside your workforce requires the Commission's prior written approval (reg 7(3)). Do not assume an external stopgap is automatic.

6 Where Innovast fits

Innovast provides REM services within the regulation 6 framework — properly tiered REMs, capped workloads, contracted to the statutory duties, with the internalisation handover built into the engagement plan. We currently reserve external REM capacity for a limited number of consumers (the regulation caps bind us too — that is the point of them). **anslem@innovast.asia · +60 12 355 6214**

> **The REM's reporting burden is a data problem.** InnoSense gives your REM the twelve-month consumption record, EnPI tracking and EnMS evidence trail the EE&C report needs — maintained continuously. Register interest at **eeca2024.my**

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 (Pind. 1/2026) 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
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 **(this document)**
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