



## Assurance Statement

**Independent assurance statement by Deloitte LLP to TotalEnergies Gas & Power Limited (“TotalEnergies”) on the application of TotalEnergies’ interpretation of Quality Criteria 1 to 5, and 8 of WRI GHG Protocol’s Scope 2 Quality Criteria and carbon intensity of electricity supplied to Green Energy Supply Product (GESP) customers for the year ended 31 March 2023 as per the following assertions:**

- the volume of energy supplied for identified Green Energy Supply Products (including Renewable Power, Pure Green, Your Green and Your Pure Green) and tariffs customers is matched to energy from renewables sources based on Renewable Energy Guarantees of Origins (REGOs) sources;
- the product-level carbon intensity of Green Energy Supply Products (including Renewable Power, Pure Green, Your Green and Your Pure Green), to support customer carbon reporting under the market-based method as defined in the World Resources Institute (WRI) Greenhouse Gas (GHG) Protocol’s Scope 2 Quality Criteria 1 to 5, and 8, for the year ended 31 March 2023.

Our work was conducted in accordance with the International Standards for Assurance Engagements (ISAE) 3000 (Revised) (“the Standard”).

### **What we looked at: scope of our work**

TotalEnergies Gas & Power Limited has engaged us to perform limited assurance procedures on:

- The electricity supplied to GESP customers for the year ended 31 March 2023; and
- The application of TotalEnergies’ interpretation of Quality Criteria 1 to 5, and 8 of the WRI GHG Protocol’s Scope 2 Quality Criteria (outlined in table 7.1 within the ‘GHG Protocol Scope 2 Guidance, an amendment to the GHG Protocol Corporate Standard’ available at: <http://ghgprotocol.org/scope-2-guidance>) to Green Energy Supply Products.

We have been engaged to report to TotalEnergies the results of those procedures (“the Report”) and provide an ISAE 3000 limited assurance opinion over whether anything has come to our attention to lead us to believe that the relevant Green Energy Supply Product information is not in all material aspects fairly stated.

We note that the Department for Energy Security and Net Zero (DESNZ) fuel mix disclosure (FMD) template for suppliers to report the fuel mix of their total supply, and Ofgem’s Standard Conditions of Electricity Supply Licence condition 21, do not require a supplier to identify the volume of REGOs that are used for specific products (i.e. Green Energy Supply Products) separated from the volume of REGOs that are used for other products. Therefore, the UK average fuel mix does not separate the environmental benefit of specific renewable energy-backed energy products from the residual mix, and this would affect the accuracy of reporting of emissions by other energy users as REGOs attributed to the GESP would also be included in the TotalEnergies-average fuel mix and UK-average fuel mix.

## What standards we used: basis of our work, criteria used and level of assurance

We carried out limited assurance on TotalEnergies' Green Energy Supply Products reporting to customers in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised). To achieve limited assurance ISAE 3000 requires that we review the processes, systems and competencies used to compile the areas on which we provide assurance. The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement; and consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The assurance procedures were conducted on customer billing and consumption for the year ended 31 March 2023 using billing data at 14<sup>th</sup> July 2023.

## What we did: key assurance procedures

To form our conclusions, we undertook the following procedures:

- Interviews of management at TotalEnergies and those with operational responsibility for renewables origination and supply;
- Understanding and analysing the key structures, systems, processes, procedures and controls relating to:
  - the redeeming of REGOs and the matching of REGOs against supplied GESP volumes; and
  - the interpretation and adherence to Quality Criteria 1 to 5, and 8, of the Scope 2 Quality Criteria;
- Understanding and analysing the collation, aggregation, validation and reporting of the GESP carbon intensity.
- Assessing the GESP carbon intensity to support customer reporting of zero-carbon electricity intensity for Pure Green customers and reduced emissions for Renewable Power and Your Green customers under the market-based method as defined in GHG scope 2 guidance published by the World Resources Institute, as per Appendix 1.
- Assessing the energy supplied under TotalEnergies GESP products in the year to the REGOs purchased by TotalEnergies in the period.

## Use of report

This report is made solely to the TotalEnergies Gas & Power Ltd in accordance with ISAE 3000 (Revised) and our agreed terms of engagement. Our work has been undertaken so that we might state to TotalEnergies Gas & Power Ltd those matters we have agreed to state to them in this report and for no other purpose. Without assuming or accepting any responsibility or liability in respect of this report to any party other than TotalEnergies Gas & Power Ltd, we acknowledge that TotalEnergies Gas & Power Ltd may choose to make this report available to customers and prospective customers of its Green Energy Supply Products, which does not and will not affect or extend for any purpose or on any basis our responsibilities. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than TotalEnergies Gas & Power Ltd, for our work, for this report, or for the conclusions we have formed.

## What we found: our assurance conclusion

Based on the scope of our work and the assurance procedures we performed, nothing has come to our attention that causes us to believe that the Green Energy Supply Product (including TotalEnergies' Renewable Power, Pure Green and Your Green product offerings) carbon intensity (zero-carbon for Pure Green and reduced carbon for Renewable Power and Your Green) is materially misstated, or that it has not met in all material aspects, the WRI GHG Protocol's Scope 2 Quality Criteria 1 to 5, and 8.

## Roles and responsibilities

### TotalEnergies:

TotalEnergies is responsible for the preparation of the Green Energy Supply Product information. It is responsible for establishing and maintaining appropriate performance management and internal control systems from which the reported information is derived, including:

- The sourcing of sufficient renewables and matching of electricity volumes against relevant REGOs;
- Redeeming of relevant REGOs using the Ofgem system, and preventing the use of the REGOs for other products; and
- Interpretation and application of WRI GHG Protocol's Scope 2 Quality Criteria.

### Deloitte:

Our responsibility is to independently express conclusions on the subject matters as defined within the scope of work above to TotalEnergies in accordance with our letter of engagement. Our work has been undertaken so that we might state to TotalEnergies those matters we are required to state to them in this statement and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than TotalEnergies for our work, for this report, or for the conclusions we have formed.



Deloitte LLP

Edinburgh, United Kingdom

1 September 2023

## Independence and Quality

We have complied with the ethical requirements in the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants ("IESBA Code"). For this engagement there are no specific independence requirements with which we are required to comply.

We applied the International Standard on Quality Management (UK) 1 ("ISQM (UK) 1"). Accordingly, we maintained a comprehensive system of quality including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

## Appendix 1: Quality Criteria 1 to 5, and 8 as defined in GHG scope 2 guidance published by the World Resources Institute (WRI)

The World Resources Institute Greenhouse Gas (GHG) Protocol Scope 2 Guidance contains eight key quality criteria for the reporting of Scope 2 GHG emissions. These are copied below:

**Table 7.1 Scope 2 Quality Criteria**

Further explanation on select Scope 2 Quality Criteria can be found in Section 7.5.

<b>All contractual instruments used in the market-based method for scope 2 accounting shall:</b>
<ol style="list-style-type: none"><li>1. Convey the direct GHG emission rate attribute associated with the unit of electricity produced.</li><li>2. Be the only instruments that carry the GHG emission rate attribute claim associated with that quantity of electricity generation.</li><li>3. Be tracked and redeemed, retired, or canceled by or on behalf of the reporting entity.</li><li>4. Be issued and redeemed as close as possible to the period of energy consumption to which the instrument is applied.</li><li>5. Be sourced from the same market in which the reporting entity's electricity-consuming operations are located and to which the instrument is applied.</li></ol>
<b>In addition, utility-specific emission factors shall:</b>
<ol style="list-style-type: none"><li>6. Be calculated based on delivered electricity, incorporating certificates sourced and retired on behalf of its customers. Electricity from renewable facilities for which the attributes have been sold off (via contracts or certificates) shall be characterized as having the GHG attributes of the residual mix in the utility or supplier-specific emission factor.</li></ol>
<b>In addition, companies purchasing electricity directly from generators or consuming on-site generation shall:</b>
<ol style="list-style-type: none"><li>7. Ensure all contractual instruments conveying emissions claims be transferred to the reporting entity only. No other instruments that convey this claim to another end user shall be issued for the contracted electricity. The electricity from the facility shall not carry the GHG emission rate claim for use by a utility, for example, for the purpose of delivery and use claims.</li></ol>
<b>Finally, to use any contractual instrument in the market-based method requires that:</b>
<ol style="list-style-type: none"><li>8. An adjusted, residual mix characterizing the GHG intensity of unclaimed or publicly shared electricity shall be made available for consumer scope 2 calculations, or its absence shall be disclosed by the reporting entity.</li></ol>

Available at:

[https://ghgprotocol.org/sites/default/files/standards/Scope%20%20Guidance\\_Final\\_Sept26.pdf](https://ghgprotocol.org/sites/default/files/standards/Scope%20%20Guidance_Final_Sept26.pdf)

**Note 1:** The World Resources Institute (WRI) Greenhouse Gas (GHG) Protocol Scope 2 Guidance, section 4.2 (emission rate approach) states that Scope 2 GHG emissions factors “do not include T&D [transmission and distribution] losses or upstream lifecycle emissions associated with the technology or fuel used in generation.” Therefore, in line with this guidance, TotalEnergies is not required to redeem, retire, or cancel REGOs to cover T&D losses for the Scope 2 emissions factor, as T&D losses are defined as part of Scope 3 GHG emissions.

**Note 2:** TotalEnergies’ assessment of the Scope 2 Quality deems Criterion 6 and Criterion 7 as not applicable for the GESP supply volume, for the following reasons:

- Criterion 6: the carbon emissions factor for the Green Energy Supply Products are not utility-specific residual mix factors; and
- Criterion 7: the Green Energy Supply Products are not sold to customers via a direct wire, and are not sold to customers as on-site generation.



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