

# **INTERFUEL: EPAAct 2005 Section 701 Waiver and Compliance Process**

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June 2020



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**June 2020**

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**<http://www.inl.gov>**

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# ***EPAct 2005 Section 701 Waiver and Compliance Process***

## ***Process Changes & Implications for FAST Reporting***

***INTERFUEL – June 10, 2020***

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*Idaho National Laboratory*

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## ***Energy Policy Act 2005 Section 701***

- **Requires relevant vehicles in EPOA-covered Federal agency fleets to consume alternative fuel when available**
- **Department of Energy (DOE) implemented process by which:**
  - Agencies may request waivers for alt fuel vehicles without access to fuel
  - DOE reviews those waiver requests
  - DOE evaluates agency compliance with EPOA's alt fuel consumption requirement



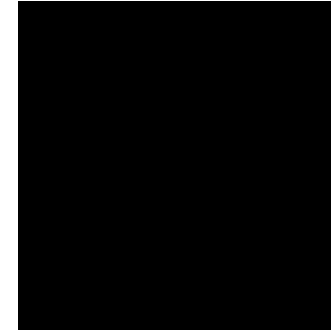
## ***Waiver Process: Recent History***

- **Agencies submitted waiver requests through FAST during June data call**
  - Exemptions for the coming FY for vehicles w/o access to alt fuel
    - Waivers based on fuel availability or cost
    - Requests based on vehicle location, fuel type/configuration
- **DOE's federal fleet program team reviewed waiver requests during July / August**
  - Approved or rejected each group of waiver requests, based on
    - Vehicle garage location
    - Vehicle fuel type/configuration
    - Fueling infrastructure location from DOE's Alt Fuel Data Center (AFDC)
  - Approved / rejected requests communicated to agencies in August / September
- **Agencies used waivers to manage fuel consumption in compliance with EPAct requirement through year**



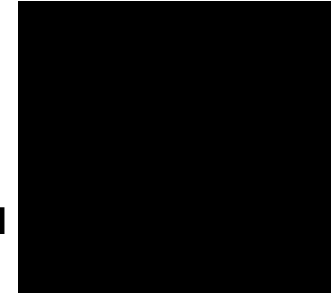
## ***Fleet Reporting: Recent History***

- **FAST vehicle-level data reporting during October – December**
  - Data element S-2, “EPA 2005 Section 701 Designation”
    - Agency indicated whether each vehicle, for prior year, was
      - *Exempt* from the requirement for alt fuel consumption
      - Had been *granted a waiver* from the requirement
      - Was *subject to the requirement* (i.e., no waiver)
  - Provided two ways to look at how agencies were performing vs the requirement
    - How closely did waiver requests align with reported 701 designations?
    - For vehicles without waivers, did their fuel consumption show compliance?



## ***Time Passes, Things Change***

- **More agencies using DOE's FleetDASH system to review alt fuel consumption**
  - More vehicles with transaction-level fueling data
- **Beginning 2017, FAST gets majority of (now all) fleet vehicles as vehicle-level data**
  - All fleet vehicles now reported with detailed location data



## ***Time Passes, Things Change***

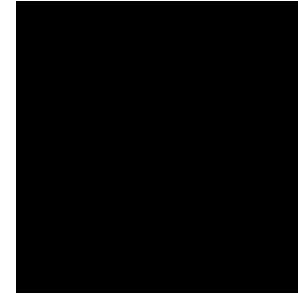
- **Federal Fleet Team: Can we take advantage of these changes to get a better 701 process?**
  - Simpler / less work for agencies?
  - Take advantage of new data?
  - Better characterization of compliance with EPCAct's alt fuel consumption requirement?
  - **Yes!**
    - Conversations with agencies started several years ago
    - Revamped process formally approved, guidance issued by DOE in March 2020
    - Important changes to both FAST and FleetDASH





## Changes to FAST Reporting

- **How do we accomplish this *without breaking everything*?**
  - Allow agencies to take advantage of revamped process
  - Transition to new process and provide time for agency systems and processes to change
- **Re-purpose (gently!) existing data element S-2, “EPAct 2005 Section 701 Designation”**
  - Change from designation of whether each vehicle was covered / waived for past year...
  - ... to designation of how agency wants vehicle to be treated for coming year
    - Is the vehicle subject to the requirement?
    - How should the vehicle be evaluated vs. the requirement?
    - Does it need a waiver?
    - If a waiver is needed, what is the basis for the waiver?



## ***Changes to FAST Reporting***

- **Data element S-2, “EPA 2005 Section 701 Designation”**
  - New set of designations supported Fall 2020 for FY 2020 fleet data reporting:
    - **EXEMPT** – Vehicle is exempt from EPA alt fuel consumption requirement
    - **NO-WAIVER** – Vehicle is subject to EPA alt fuel consumption requirement and does not require a waiver (i.e., will consume only alt fuel)
    - **WREQ-DISTANCE** – Vehicle is subject to requirement, but needs a waiver based on distance to alt fuel
    - **WREQ-NOACCESS** – Vehicle is subject to requirement, but needs a waiver based on access restrictions to alt fuel
    - **WREQ-FUELCARD** – Vehicle is subject to requirement, but needs a waiver based on lack of support for fleet fuel card(s) where alt fuel is available
    - **WREQ-COST** – Vehicle is subject to requirement, but needs a waiver based on cost of alt fuel



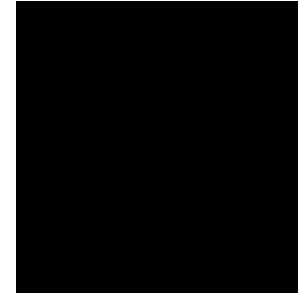
## ***Changes to FAST Reporting***

- **Data element S-2, “EPAct 2005 Section 701 Designation”**
  - New set of designations supported Fall 2020 for FY 2020 fleet data reporting:
    - EXEMPT
    - NO-WAIVER
    - WREQ-DISTANCE
    - WREQ-NOACCESS
    - WREQ-FUELCARD
    - WREQ-COST
  - **FLEETDASH** – Vehicle is present in FleetDASH; FleetDASH will be used as basis for evaluating compliance
  - **DEFAULT** (or not specified) – FAST and fleet team will use agency and vehicle attributes to determine designation



## Changes to FAST Reporting

- **Data element S-2, “EPAct 2005 Section 701 Designation”**
  - Previous values for data element still supported
    - *Deprecated: still allowed but will be retired in the future*
    - Re-interpreted in manner that makes sense under new process:
      - Old **EX** = New **EXEMPT**
      - Old **COV** = New **NO-WAIVER**
      - Old **WAIV** = New **WREQ-DISTANCE**
  - Keeps existing systems and processes from breaking until they can be updated
  - Updated validation rules
    - Analogous to current rules for S-2
    - Tuned for new designations
    - Revised interpretations of older deprecated designations
    - Ignore disposed vehicles



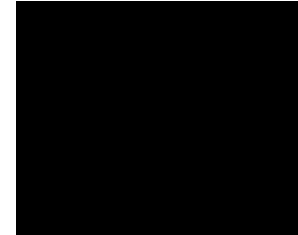
## Changes to FAST Reporting

- **Data element S-2, "EPAct 2005 Section 701 Designation"**
  - How does **DEFAULT** (or not specified) get interpreted?
    - **EXEMPT**
      - Non-EPAct covered agency vehicles
      - Foreign vehicles
      - Disposed vehicles
      - LE / ER vehicles
      - Dedicated / single fuel configuration vehicles
    - **FLEETDASH**
      - EPAct covered agency vehicles with dual / flex fuel configuration known to be in FleetDASH
    - **NO-WAIVER**
      - All other vehicles (i.e., EPAct covered agency + domestic + non-LE / ER + dual / flex fuel configuration + not in FleetDASH)
  - **DEFAULT** is *intentionally* powerful!
    - Agencies are encouraged to use it to streamline reporting



## ***What Happens After Reporting?***

- **Vehicles in FleetDASH**
  - Evaluated for compliance using FleetDASH and fuel transaction data
- **Vehicles not in FleetDASH**
  - Agency completes fall fleet data submission
  - Information exported from FAST for fleet team to review waiver requests
  - Fleet team reviews and approves / rejects each waiver request
  - Review result (approved / denied waiver) imported back into FAST for each vehicle
  - Review result exposed through FAST query tool and communicated to agency POCs
  - Agency compliance evaluated based on
    - Coverage designations
    - Approved / denied waiver requests
    - Reported fuel consumption



## ***FAST Program Points of Contact***

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