

FLEET VEHICLE RECOMMENDATION REPORT

I. Understanding the Fleet Vehicle Recommendation Report

The purpose of this report is to provide information about:

- Whether a fleet vehicle is optimized for fuel type;
- Whether a fleet vehicle is optimized for utilization;
- Whether you should consider a different model type or eliminating a vehicle altogether from your fleet.

The attached report has five “Tabs”:

- **Tab 1 – Legend and Summary**: provides the legend for interpreting Tabs 2, 3, 4 and 5. The legend explains the criteria used to determine whether your fleet is optimized for alternative and petroleum fueled vehicles.
- **Tab 2 – Location Summary**: Shows all garage locations and how many vehicles are at each location. Also shows the number of vehicles within each color code classification to indicate the number of vehicles at each location that may need further optimization.
- **Tab 3 – Vehicle List** – lists all GSA leased vehicles assigned to your agency.
- **Tab 4– Alternative** – lists each Alternative Fuel Vehicle (AFVs) in your fleet, shows if the vehicle is optimized for fuel type and utilization, and provides recommendations.
- **Tab 5 – Petroleum** – lists each petroleum fueled vehicle in your fleet, shows if the vehicle is optimized for fuel type and utilization, and provides recommendations.

Using the DOL AUTOS system, each fleet vehicle was checked against the Department of Energy (DOE) “Alternative Fuels Data Center”¹ for available fuel types and the locations of the service stations within a five mile radius. For E-85 fleet vehicles, the stations that carried E-85 fuel within the 5 mile radius were checked for public accessibility and whether the station accepts the General Services Administration (GSA) Fleet card. All this information was used to generate a color coding for each vehicle and specific recommendations. Data used to generate color coded recommendations is current to November 3, 2014.²

Use the link to the “[DOE Alt Fuel Map](#)” to find the most current AFV stations proximate to the vehicle location. Additionally, the report shows vehicles that are currently, on average, underutilized as based upon GSA’s standard that vehicle utilization should be at least 600 miles per month.

¹ See <http://www.afdc.energy.gov/locator/stations/>

² Please note that because agency fleets fluctuate, the report data may not reflect recent vehicle acquisitions or reductions.

What Information is Under Tabs 3 and 4?

Under Tab 3 for AFVs and Tab 4 for gasoline vehicle you will find information as follows:

| Column | Information |
|--------|--|
| A | Shows whether a GSA-leased vehicle is potentially eligible for replacement in the upcoming FY 2015 cycle. If a “Yes” is in this column, this indicates that the vehicle is potentially replacement eligible and that GSA will be making a final determination over the upcoming weeks about whether this vehicle should be turn-in to GSA. Your agency will need to determine if a turned-in vehicle should be replaced or eliminated. |
| B | Lists the GSA-assigned vehicle “Tag” number |
| C | Lists the GSA Standard Item Number (SIN) assigned for this class of vehicle. |
| D | Shows the vehicle fuel type. |
| E | Shows the vehicle class such as compact, sedan, SUV, 2x4, etc. |
| F | Provides the vehicle garage location that the DOL National Office has on file in the AUTOS system. If this information is incorrect, please correct in the AUTOS system. |
| G | Shows the overall “score” that was assigned for this vehicle choice. See the “Legend and Summary” Tab for further information. |
| H | Provides a recommendation as to what action the agency fleet manager should consider. |
| I | Provides a link that maps the vehicle location to the nearest AFV fuel stations. Agency fleet managers should use this link to analyze whether an AFV or low GHG gasoline-fueled model vehicle is more appropriate for the location. |
| J | Shows the number of months that the vehicle was driven in FY14. |
| K | Shows the number of total miles the vehicle was driven in FY 14. |
| L | Provides information on whether the vehicle is considered to be underutilized relative to the average miles driven per month. A vehicle with an average utilization of less than 600 miles per month should be considered for elimination. |

How to Use the Report

- 1) Vehicle Replacement and Elimination - As you review vehicles for GSA replacement, consider:
 - The recommendations made by this report and whether a vehicle is properly located for AFV use;
 - Whether the vehicle size can be reduced;
 - Vehicle utilization rate; and
 - If the utilization rate is too low to justify maintaining the vehicle in the fleet.
- 2) Optimization – Review vehicles to ensure that AFVs are located near fueling stations with available alternative fuels. If NOT consider relocating or replacing the vehicle. Specifically:

- If a vehicle uses E-85 fuel and E-85 fuel is NOT within a 5 mile radius of the vehicle location, consider replacing the vehicle with some other AFV, such as an electric-gas hybrid or a low Greenhouse Gas (GHG) gasoline-fueled model.
 - If an E-85 station is located within the 5 mile radius but is either not accessible or does not accept the GSA Fleet Card, please contact the local station and your local GSA FSR to request assistance with gaining station access or Fleet Card acceptance.
- 3) Increasing Alternative Fuel Use – If your agency has an E-85 vehicle that is located within a 5 miles radius of one or more E-85 fuel stations, use the “Alt Fuel Locations” hyperlink on Tabs 2 or 3 to find station locations. Notify all E-85 vehicle drivers of the station locations and the requirement to use **only** E-85 when refueling the vehicle.
 - 4) Meeting Requirements – Review the “Federal Requirements” (below) and use the “Recommendations” report to analyze and update your agency’s Vehicle Allocation Methodology (VAM).
 - 5) Waivers – Consider if the vehicle will need to be granted a waiver from E-85 fuel requirements or a Functional Needs Exemption.

II. Federal Requirements for Alternative Fueled and Low Greenhouse Gas (GHG) Vehicles

As an agency Fleet Manager, there are many requirements that you must consider when acquiring, maintaining and fueling fleet vehicles.

- The Energy Policy Act (EPA) of 2005, Section 701, requires that Department of Labor (DOL) use alternative fuels in dual-fuel vehicles unless the Department of Energy (DOE) determines that the vehicle qualifies for a waiver. The Office of Management and Budget (OMB) has interpreted this to mean that 100% alternative fuel must be used in dual-fuel vehicles, unless the vehicle has been granted a DOE waiver, which is applied for by the DOL National Office Fleet Team.
- The Energy Independence and Security Act (EISA) of 2007, prohibits federal agencies from acquiring light or medium duty passenger vehicles (MDPV) that are not low GHG emitting vehicles without Functional needs exception (FNE), which is a written certification by the federal agency head (Sec. 141). EISA also codifies Executive Order 13423 provisions relating to petroleum consumption and alternative fuel use (Sec. 142).
 - **Light-Duty Motor Vehicles**³ include passenger cars, and, depending on their gross vehicle weight rating (GVWR), pickup trucks, minivans, passenger vans and sport-utility vehicles.

³ A motor vehicle, as defined by 40 C.F.R. § 85.1703, is a vehicle that is self-propelled and capable of transporting a person, persons, any materials, or any permanently or temporarily affixed apparatus, and, among other things, is capable of exceeding 25 miles per hour (mph) over level, paved surfaces. Section 301(11) of EPA92 (42 U.S.C. §

- **Medium Duty Passenger Vehicles (MDPV)** are vehicles with a GVWR between 8,500 lbs. and 10,000 lbs. designed to transport primarily persons, as defined by 40 C.F.R. § 86.1803-01.
- **Heavy Duty Trucks** (e.g., pickup trucks and non-passenger vans over 8,500 lbs. GVWR or 6,000 lbs. curb weight) are outside the scope of § 141.
- **Functional Needs Exception (FNE)** - EISA Section 141 provides a way to exempt individual vehicles from the requirements to purchase low GHG-emitting vehicles but only if no low GHG-emitting vehicle is available to meet the functional needs of the agency. The agency head must certify in writing that no low greenhouse gas emitting vehicle is available to meet the functional needs of the agency and must also provide detailed information about the functional needs that could not be met with a low greenhouse gas emitting vehicle.
- **Executive Order 13514**, *Federal Leadership in Environmental, Energy, and Economic Performance* (Oct. 5, 2009)⁴ requires that DOL: (1) use low GHG emitting vehicles, including alternative fuel vehicles; (2) optimize the number of vehicles in the fleet; and (C) reduce the agency fleet's total consumption of petroleum products baseline relative to a FY 2005 baseline by a minimum of 2 percent annually.
- **Executive Order 13423**, *Strengthening Federal Environmental, Energy, and Transportation Management* (Jan. 26, 2007)⁵, requires that the DOL reduce the fleet's total consumption of petroleum products relative to the year 2005 baseline by 2 percent annually. At the same time, non-petroleum fuel consumption is required to increase by 10 percent annually.
- **Presidential Memorandum – Fleet Performance** (May 24, 2011)⁶ Section 1 (a) requires that by December 31, 2015, all new light duty vehicles leased or purchased by agencies *must be* alternative fueled vehicles, such as hybrid or electric, compressed natural gas, or biofuel. Moreover, agency alternative fueled vehicles must, as soon as practicable, be located in proximity to fueling stations with available alternative fuels, and be operated on the alternative fuel for which the vehicle is designed.
- **The Executive Fleet – Motor Vehicle Management Regulations** set forth at 41 C.F.R. 102-34.50, require executive fleets to achieve maximum fuel efficiency; be limited in motor vehicle body size, engine size, and optional equipment to what is essential to meet agency mission; and be midsize or smaller sedans, except where larger sedans are essential to the agency mission.⁷

13211(11)) defines light-duty motor vehicle to include both light-duty vehicles and light-duty trucks as defined by 40 C.F.R. § 86.1803-01.

⁴ 74 Fed. Reg 52117.

⁵ 72 Fed. Reg 3919.

⁶ See <http://www.whitehouse.gov/the-press-office/2011/05/24/presidential-memorandum-federal-fleet-performance>.

⁷ *Id.* at Sec. 1(b).

- **Vehicle Allocation Methodology (VAM)** – Federal Agencies are required to determine their optimal fleet inventory using the Vehicle Allocation Methodology (VAM) and VAM targets are intended to be achieved by December 31, 2015.⁸ DOL will request updated VAM information annually from each agency.

III. How Do Agencies Obtain Waivers or Exemptions from Requirements?

Waiver to Exempt E-85 Vehicles from E-85 Fueling Requirements

The Department of Labor (DOL) wants E-85 vehicles to be located in areas where E-85 fuel is readily accessible. Sometimes this is not possible. Consequently, each June, DOL National Office reviews each vehicle garage location against the fuel stations that are within a 5 mile radius to identify which vehicles might qualify for a Department of Energy waiver from the E-85 fuel requirements. Waiver requests can only be made once annually for the upcoming fiscal year. Therefore, each year the National Office requests waivers from the Department of Energy through the FAST system for all applicable vehicles that qualify for a waiver. The Department of Energy determines whether to grant DOL waiver requests. If granted, the waiver exempts all applicable vehicles at a specified garage location from the requirement to only use E-85 fuel. A vehicle's correct garage location is critical for obtaining a Department of Energy vehicle fuel waiver; therefore, Agency Fleet Managers must keep garage locations in AUTOS current.

Functional Needs Exception

If a light-duty or mid-duty passenger vehicle is being ordered that is NOT a low Greenhouse Gas vehicle, the Agency Fleet Manager must apply for a "Functional Needs Exception" (FNE) to meet EISA Section 141 requirements. Complete the Department of Labor "Functional Needs Exception" (FNE) form for each vehicle that requires an exception because it is unable to fulfill mission requirements using a low greenhouse gas vehicle. The completed FNE form must be certified by the agency Fleet Manager and agency Administrative Officer, and sent to the National Fleet Manager at gilbert.susan.j@dol.gov. All new vehicle acquisitions that require an EISA Section 141 exception will need to have an approved FNE on file prior to vehicle order approval.

IV. Vehicle Garage Locations Are Required

Fleet Managers must input the vehicle garage location into the DOL AUTOS database system for any agency vehicle that is missing the garage location or where the garage location is incorrect. A vehicle's correct garage location is used for obtaining a Department of Energy vehicle fuel waiver, for determining what vehicle models can be ordered for use in a specific region, and for providing your agency information on whether the vehicle is optimized for fuel type.

⁸ *Id.* at Sec. 3.