

FAST EISA Section 246 Infrastructure Reporting FAQ

1. What does EISA Section 246 require?

By January 1, 2010, Federal agencies must install at least one renewable fuel pump at each Federal fleet fueling center under their jurisdiction subject to the EISA Section 246 requirement. At these fueling centers, agencies must install either an E85 refueling pump, biodiesel (B20 or greater) refueling pump, or electric charging station.

2. Does EISA Section 246 apply to me?

The answer to this question is broken down in a series of more specific questions:

a. What is a "Federal agency"?

Under EISA Section 246, "Federal agency" means any Federal executive department, military department, Government corporation, independent establishment, or executive agency, the United States Postal Service, the Congress, the courts of the United States, or the Executive Office of the President.

b. Which Federal agencies are subject to the EISA Section 246?

The EISA Section 246 requirements apply to all agencies with vehicle fleets covered by EPAct 1992, often referred to as "EPAct-covered fleets" within FAST. Please note, however, that if your agency is not considered an EPAct-covered agency and you wish to provide information about your Federal fleet fueling centers, you are encouraged to do so. Note also that the responsibility for submitting the needed data via FAST has been assigned to "Y" level users (FAST agency administrators) for each of the agencies.

c. Which Federal fleet fueling centers are subject to the EISA Section 246 requirements?

EISA Section 246 requirements for installation of renewable fuel infrastructure only apply to Federal fueling centers located in the United States that meet all of the following:

- i. Provides central refueling of Federal fleets. EISA Section 246 only applies to existing federally owned or contracted refueling sites located in a MSA or consolidated metropolitan statistical area (CMSA) where Federal fleets of 20 or more LDVs are centrally refueled. Law enforcement, emergency, and military tactical vehicles are not counted in the size of the fleet served by the fueling center.
- ii. (Fueling center owned/contracted by non-Department of Defense Federal agency) OR (fueling center owned/contracted by Department of Defense with an annual fuel turnover rate greater than 100,000 gallons of conventional fuel); *parens added for clarity*. **NOTE:** As of April 2010, formal guidance interpreting the 100,000-gallon threshold has not been approved. Agencies should recognize that there may be some differences in how that threshold is ultimately interpreted and applied as Section 246 guidance goes through the approval process.
- iii. No existing renewable fuel pump. Federal fleet fueling centers with existing renewable pumps already meet the EISA Section 246 requirements.
- iv. No existing renewable fuel available locally. Agencies are not required to install a renewable pump at Federal fleet fueling centers in locations where

renewable fuel is reasonably available at a nearby retail station (or other accessible fueling center). The criteria for availability of renewable fuel are the same as for Section 701 of EPCA 2005—alternative fuel is reasonably available if it can be obtained within a 15-minute drive or within five miles (one way) from the Federal fleet fueling center.

d. *What is considered a "renewable fuel" under EISA Section 246?*

For the purpose of EISA Section 246, "renewable fuel" includes the following fuel types:

- i. At least 85 percent ethanol (E85).
- ii. A mixture of biodiesel and diesel or renewable diesel fuel (as that term is defined under section 211(o) of the Clean Air Act), containing at least 20 percent biodiesel or renewable diesel.
- iii. Electricity derived from a renewable source of energy or non-renewably generated electricity if renewable energy credits (RECs) equal or greater than the electricity used are purchased.

e. *What is considered a "renewable fuel pump"?*

Based on (d), above, renewable fuel pumps under EISA Section 246 include E85 refueling pumps, biodiesel (B20 or greater) refueling pumps, or electric charging stations.

3. Where can I find a copy of EISA Section 246?

A good overview of EISA 2007 as a whole can be found on the Department of Energy's Federal Energy Management Program Web site at the following address:

[EISA 2007 \(overview\)](http://www1.eere.energy.gov/femp/regulations/eisa.html)

URI: <http://www1.eere.energy.gov/femp/regulations/eisa.html>

The full text of EISA 2007, including Section 246, is available on the US Government Printing Office's Federal Digital System:

[EISA 2007 \(full text\)](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=110_cong_public_laws&docid=f:publ140.110)

URI: http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=110_cong_public_laws&docid=f:publ140.110

4. What data do I have to report about my fueling centers?

For each fueling center in operation during the reporting period (regardless of the volume of fuel distributed), the reported information shall include:

- a. Location of fueling center,
- b. If the fueling center has closed during the reporting period, the date of closure,
- c. Types and amounts of fuels dispensed; note that all fuel quantities reported will be in appropriate natural units for the corresponding fuel type as shown below,
- d. Availability of renewable fuel at a nearby retail station or accessible fueling center,
- e. Access to the fueling center by other organizations, and
- f. Plans for installing renewable fuel pumps

5. When do I have to submit the required data?

Reporting of the fueling center information will be accomplished using the Federal Automotive Statistical Tool (FAST) system during the same time period as the EPCA 2005 Section 701 waiver submission process. For most years, this reporting will occur during June

and must be completed on or before June 30 of each calendar year.

6. **Why is this data being collected at the same time as the EAct 2005 Section 701 waiver request data?**

The EISA Section 246 fueling center data is being collected at the same time as the EAct 2005 Section 701 waiver requests in large part based on the relationships between the two datasets. DOE will use the updated information about available alternative fueling infrastructure collected as part of the EISA Section 246 reporting process to help ensure that agency requests for waivers from the alternative fuel consumption requirements of EAct 2005 Section 701 are reviewed based upon the most current fueling center data available. Collecting these two related datasets concurrently is intended to help ensure the quality of that waiver review process.

7. **Who within my agency can enter the required information into FAST?**

The ability to enter the required information into FAST is restricted to FAST users who have been assigned the “agency administrator” role (“Y-level” users) **OR** who have been assigned the “hierarchy administrator” role (“X-level” users) and who are attached to their agency’s FAST reporting hierarchy at the agency level. Note, however, that the ability to define the end date for the 12-month reporting period for each agency (see question 11, below) and the ability to toggle the agency’s submission to “complete” is restricted to Y-level users.

8. **Can more than one FAST user from my agency work on submitting this data?**

Yes, provided that no more than one FAST user from your agency attempts to update the information for an existing fueling center at any given time. For agencies wishing to involve multiple people in the task of updating the information for the existing fueling centers, we recommend that the agency provide clear guidance to all of the users involved in the reporting process as to which fueling centers each user is responsible for updating. This should minimize the likelihood of two users “bumping into each other” in the updating process.

Two or more users can be adding information for *new* fuel centers without restriction and without worrying about causing problems for each other.

9. **Can I import this data into FAST somehow?**

Not at this time. The FAST management team will evaluate the need for incorporating some means of importing the required information about both existing and new fueling centers prior to the next reporting process. For this first iteration of reporting this information through FAST, the information will need to be manually updated/entered.

10. **Which of my agency's fueling centers have to be reported during the data call?**

Agencies must report information for *all fueling centers* within their jurisdiction, including those not meeting the definition of Federal fleet fueling center and/or the requirement for the presence of renewable fuel infrastructure, as described above.

11. **How should I select the 12-month reporting period for my agency's EISA Section 246 submission?**

This decision is left largely in the hands of the individual agencies. For consistency's sake, agencies that have reported EISA Section 246 information to DOE in past years are encouraged to retain the same reporting period they have used in previous submissions.

Common choices will include the prior fiscal year, prior calendar year, or most currently available data. The most important aspect is the availability of a full 12-month coverage of the fuel volume data.

12. Should I report the total volume of fuel dispensed at my agency's fueling centers or only the volume of fuel dispensed for use in motor vehicles?

You should report the total volume of dispensed fuel for each relevant fuel type for each of your fueling centers, regardless of whether that fuel was dispensed for use in your motor vehicle fleet, other fleet vehicles, or non-vehicle applications. If one or more of your fueling centers dispensed a significant volume of fuels for use in non-fleet or non-covered fleet purposes, please contact Ryan Daley at DOE/NREL (contact information below) for further guidance.

13. What units should I use for reporting fuel dispensed at my fueling centers?

All fuel volumes reported as part of your EISA Section 246 submission should be in “natural units”:

Fuel Type	Description	Natural Units
GAS	Gasoline	Gallons
DSL	Diesel	Gallons
B20	Bio-diesel B20 blend	Gallons
B100	Bio-diesel	Gallons
E85	E-85	Gallons
ELER	Electricity generated from renewable fuel sources	KWH
HYD	Hydrogen	Kilograms
CNG	Compressed natural gas	Hundred cubic feet
ELEN	Electricity generated from nonrenewable fuel sources	KWH
LNG	Liquefied natural gas	Gallons @ 14.7 PSI, -234° F
LPG	Liquefied propane gas	Gallons

14. How do I know if the electricity being distributed at my fueling center is renewable or non-renewable?

If you are generating the electricity on-site, the facility manager should be able to provide a definitive answer regarding the method of generation. If you are purchasing the electricity from a vendor or utility, the supplier should be able to provide information about the method of generation. Alternatively, if RECs were purchased equal to or greater than the quantity of electricity distributed, you can report it as being generated from renewable sources. If you are at all uncertain about the method of generation for the electricity distributed at your fueling center, you should report it as non-renewable. If you report it as electricity generated from renewable sources, you should be prepared to provide documentation supporting the generation method(s) and/or RECs involved..

15. My agency has an agreement with a vendor to deliver fuel to one of my fleets via tank trucks on a periodic basis, where the tank truck arrives at our motor pool and the vehicles are refueled directly from the tank truck. Should I report this as a “fueling center”?

If the situation described here is a long-term (e.g., 6 months or longer) arrangement by

which fuel is being made available to a portion of your vehicle fleet or other fuel-consuming equipment, it makes sense to consider this mechanism for providing fuel a form of "fueling infrastructure". Within this context, these situations should be characterized as "fueling centers" and reported as such during the EISA Section 246 reporting period supported by FAST. The address provided for these fueling centers should correspond to the primary address to which the fuel is being delivered to refuel vehicles. You should consider including some indication of the nature of these "fuel centers" in the fuel center title and/or within the "Plans" field on the corresponding record within your agency's submission.

16. What happens to the data about my fueling centers that I report as part of this process?

The primary purpose for each EAct-covered agency submitting this information about their fueling centers is to enable DOE to determine:

- a. which of the Federal government's fueling centers meet the various thresholds such that the fueling centers are subject to the requirement for the installation or presence of renewable fuel infrastructure, and
- b. which of those subject fueling center have the required renewable fuel infrastructure in place.

A secondary – but also important – use of the reported data is to help ensure DOE's compilation of information about the location and availability of alternative fuel infrastructure is complete and accurate. Information about the location and type of fuel available at Federal fueling centers has, in the past, been added to DOE's Alternative Fueling Station Locator (<http://www.afdc.energy.gov/afdc/locator/stations/>) which is a key data source used in the review process for the EAct 2005 Section 701 waiver request submitted by Federal agencies. If your agency does not wish to have this information available to the public, please contact Ryan Daley at DOE/NREL (contact information below) for further guidance.

17. Who should I contact if I have other questions about the EISA Section 246 requirements or about reporting this data?

For questions about the EISA Section 246 requirements and interpretation of those requirements, contact

Ryan Daley, DOE/NREL
ryan.daley@nrel.gov
(303) 275-4466

For questions related to reporting the required data using FAST, contact

Michelle Kirby, DOE/INL
michelle.kirby@inl.gov
(208) 526-4273