



ESB Networks Response – Clean Vehicles Directive Public Consultation

Introduction

ESB Networks welcomes the opportunity to respond to this consultation on implementing the Clean Vehicles Directive. ESB Networks are committed to electrification of transport and to the transition of our fleet to electric and low emission subject to the availability of models that are proven to meet our business use and technical requirements.

We support the objectives of the Clean Vehicle Directive. We already use lifecycle costing as set out in the current clean and energy efficient vehicle directive in our commercial evaluation as part of the procurement process and this is set out in all our relevant tender documents. This means that we constantly test the market for cleaner vehicles that can meet the requirements of our business.

We are supportive of the approach set out in the consultation including the alignment for reporting with existing public sector reporting requirements.

About the ESB Networks Fleet

ESB Networks is responsible for the design, construction and maintenance of the electricity infrastructure. This infrastructure is composed of over 150,000 KM of overhead electricity network criss-crossing the country often in difficult terrain almost 25,000KM of underground network and over 250,000 transformer substations.

Most of these assets are off road, in addition a substantial amount of the activity in both new connections, substation construction and underground cable installation takes place in construction sites. Unlike other utilities most of our assets are not roadside but are mainly off road or in fields.

ESB Networks must ensure that the electricity network operates safely and securely and all times. We must speedily and safely restore supply following outages and eliminate faults. We may have to travel considerable distances to find and repair these faults and it is vital that our technicians have vehicles and associated equipment to do the job safely. Our transport fleet is designed to meet these unique and challenging requirements.

ESB Networks fleet is composed of 2000 Vehicles. Our fleet composition is as follows:

1. We have approximately five hundred bespoke built utility Heavy Goods Vehicles. Most of these act as mobile workshops. They typically have cable winches, elevated



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insulated work platforms and material handling and transport capability built on. They cannot be purchased straight off a production line. Instead they are generally built on a specialist chassis with extreme off-road capability. The chassis cabs are generally purchased using multiyear (5) frameworks contracts. The vehicle build is then completed by a bodybuilder and or crane or elevated platform provider. Our vehicles are very much bespoke for our needs. We require chassis and capabilities similar to those in use for fire engines and off-road military vehicles. Range and payload are also key factors.

2. We also own approximately twelve hundred larger vans and pick-ups. We have by far the largest fleet of off-road vans (4X4) in Ireland. These vehicles also act as mobile workshops with bespoke fit out and off-road capability. Range and payload is very important for these vehicles as the technicians have to cover large geographical areas in the course of their duties. They also have materials handling requirements. These vehicles are generally purchased using multi-year (5) frameworks contracts.
3. We also have approximately three hundred small vans. These vans are used for metering activities, stores and other activities where short distances are travel and the payload requirements are small as they do not have to carry large amounts of materials or equipment. These are generally purchased on multi-year framework contracts.

ESB Networks and the Clean Vehicles Directive

ESB Networks commitment to the electrification of transport can be seen by the fact that we currently own a large fleet of seventy-five small electric vans which were purchased following a tender process for small vans. In fact, in all tenders for vehicles / chassis since 2018, ESB has sought quotations for suitable low/zero emission vehicles but except for these small vans no suitable alternatives were available. All our market research to date indicates that for the HGV cab/chassis that would meet our needs there does not appear to have any viable low emission options both now and over the next few years. For the large 4X4 vans meeting our payload, fit-out, reliability and range requirement there does not appear to be a low emission option available currently either, but this is regularly reviewed.

We use lifecycle costing as set in the current clean and energy efficient vehicle directive in our commercial evaluation as part of the procurement process and this is set out in all our relevant tender documents.

We wholeheartedly support the objectives of the clean vehicle directives. However, most of our fleet are specifically designed, and all our HGV fleet are coming from markets where there are no suitable low emission alternatives. These vehicles are often adaptations of off-road HGVs manufactured for military and emergency services which we note are exempted from the directive.



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Comments on Implementing the new Clean Vehicles Directive

ESB Networks supports the use of the existing public sector reporting structures in implementing this Directive. We would like to engage with the Department of Transport more in relation to mandatory sectoral targets. Outside of our small vans fleet, there are no viable low emission alternatives available to us now given our unique and demanding needs.

To this end, ESB networks would strongly support implementation of the optional exemptions set out in the directive (2e in the consultation) and ensure that the exemption should apply to vehicles that are used in the construction, maintenance and repair of the electricity networks.

We will of course seek continue to seek low emission vehicles that can meet our requirements in our vehicle procurement processes. Meanwhile we will continue to operate lifecycle costing in vehicle procurement, thereby supporting the use of more efficient and less polluting vehicles in particular realistic electrical options where they exist.

Further Engagement

ESB Networks would like to engage further with the Department of Transport on the transposition of this Directive. We are available to meet to talk through the contents of this response and to discuss the wider implications and opportunities with this Directive.