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Dear Enterprise Portfolio Management Office team,

I am writing to respond to your *Forward Work Programme – 2025/26 consultation* on behalf of the Emergency Services Environment & Sustainability Group (EESG), which brings together over 100 emergency services' ('blue light') organisations.

The emergency services organisations recognise the important role Ofgem plays in both protecting the interests of energy customers and enabling net zero targets to be met. **Given the size of the emergency services sector as well as the importance of their continued service delivery to UK public, we would like to see the emergency services' organisation needs being considered in Ofgem's Forward Work Programme.**

This is linked to Ofgem's Strategic Priority 2: Enabling infrastructure for net zero at pace:

- We have evidenced a strong appetite across all emergency services' organisations for progressing their net zero plans at pace, and for seeking solutions to collaboratively overcome barriers to decarbonisation.
- There is a growing risk that delays in electricity infrastructure delivery could compromise public safety, if frontline service delivery is impacted:
  - Several vehicle manufacturers have already announced plans for discontinuing the production of petrol and diesel vehicles in 2020s, shifting their investment towards electric vehicles (EVs). To avoid the risk of not having sufficient amount of usable vehicles to respond to calls from public when the vehicles available through the supply chain are predominantly EVs, the electrical (both electricity network and on-site) infrastructure needs to be assessed, right-sized, and established in advance, i.e. within the next five years.
  - Conversely, current emergency services' funding arrangements are insufficient for the investment in electricity infrastructure required to mitigate the associated operational risks to service continuity and to enable net zero targets to be met in the long-term. Electricity Distribution Network Operator (DNO) connections' timelines are likely to impact operations at multiple 'blue light' sites, with a small number already affected.
  - The expected increase in the number of electrically powered 'blue light' sites and fleets necessitates an early review of resilience and power restoration requirements, as well as site connections' requirements, to ensure any adverse impacts on service continuity, and therefore on public, can be minimised.
- The reliability and availability of infrastructure will be critical for effective emergency fleet transition to electrically powered vehicles, service continuity, as well as being a key enabling action for decarbonisation of the 'blue light' estates. To aid this, the 'blue light' organisations have proposed that:
  - **Ofgem, working with Government, consider how multi-year, non-competitive funding that is ring-fenced for electrical network infrastructure investment can be allocated to enable decarbonisation of fleet and estates of the blue light organisations,** offering guidance for how these are to be accessed in shared locations.

- **The energy sector take “an active role in agreeing and delivering joint solutions for emergency services by:**

(a) engaging with the emergency services nationally **to understand and meet their requirements for resilience**, accordingly sharing, informing and updating their plans and their prioritisation for power cut restoration work, or other associated processes; and

(b) taking a lead in coordinating the assessment of the combined future electrical demand from the emergency services and **facilitating joint planning for the emergency service infrastructure needs** to ensure they are appropriately reflected in electricity network regulatory frameworks, planning, and forecasting.”

The abovementioned points have been informed by the engagement carried out across the sector (please see the *Decarbonisation of the UK Emergency Services Fleets – challenges and solutions* discussion paper attached). For further reference, we also attach our recent response to the RESP policy framework consultation, submitted on 8 October 2024, where we have made similar points.

We would be happy to ensure the appropriate representation from emergency services to discuss this with you further and hope that our response will help prompt and support a collaborative approach for ensuring timely emergency service fleet transition and uninterrupted service delivery.

#### **About ESESG**

The Emergency Services Environment and Sustainability Group (ESESG) is comprised of over 170 individual members from police, fire and rescue and ambulance services as well as other organisations such as coastguard and RNLI. For reference, there are 52 fire and rescue services, 48 police forces, and 14 ambulance trusts serving communities across the UK.

For reference, there are c.39,000 police fleet vehicles at c.3,000 sites, c.5,000 fire & rescue vehicles at c.1,400 sites; NHS England operate c.21,000 fleet vehicles, including ambulances, across over 20,000 sites.