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Our Ref: JB/SA
Your Ref:

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Brian Rapose
Carbon Reduction Commitment Team
Climate and Energy: Business and Transport Division
Department for Environment, Food and Rural Affairs
Area 4B
Ergon House
17 Smith Square
London SW1P 2AL

Dear Mr Rapose

Response to Carbon Reduction Commitment (CRC) consultation

Introduction

pteg represents the six English Passenger Transport Executives (PTEs) which provide, procure, promote and plan public transport in the largest conurbations outside London. Strathclyde Partnership for Transport (SPT) and Transport for London (TfL) are associate members. This response is on behalf of the six English PTEs, and SPT.

For the purposes of this consultation document **pteg** has made a common response. For the CRC itself, however, each PTE would be the responsible body. Contact details for the PTEs are attached as appendix one.

PTEs are public bodies responsible to Passenger Transport Authorities (made of representatives of the District Councils in their areas). SPT is also accountable to District Councils although the PTA and PTE function has been merged within a single entity.

PTEs and SPT do not generally operate public transport services themselves – although there are some significant exceptions. These include road tunnels in Tyne and Wear and Merseyside (about which Merseytravel is submitting a separate response), and the Tyne and Wear Metro and Glasgow Subway.

As defined in the consultation proposals we would expect some, although not all, PTEs to fall within the CRC.

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pteg represents the PTEs of Greater Manchester · Merseyside
South Yorkshire · Tyne and Wear · West Midlands · West Yorkshire



Key issues from the consultation

Applicability to the rail sector

pteg shares the Government's view that the CRC should not lead to a rise in carbon emissions by raising the cost-base of the rail sector, in a way which promotes a shift to modes which are less sustainable. Given the Government's wish to promote public transport, applying the CRC to energy use by rail and light rail traction may prove counter-productive. The rail sector could be penalised, via the CRC, for expanding its role – with no counter-balancing measures for competitor modes. We therefore support the proposal that heavy and light rail traction energy be excluded from the CRC.

At the same time, excluding traction energy from the CRC should not be considered by the rail sector as a reason for failing to address its own carbon footprint. The rail sector must have a robust and comprehensive strategy in place (via the Rail Safety Standards Board) to improve energy efficiency through cultural change, energy saving measures and through the adoption of innovative technologies.

We also support the proposal by UKTram in their separate submission to this consultation process, that UKTram should lead a programme of work to identify opportunities to advise the Government on ambitious, but realistic energy-reduction targets it might decide to set over appropriate timescales. These could include regenerative braking systems (which can either return energy directly to the overhead wires or potentially store energy on the vehicle for subsequent use) and the potential for improvements to tram design to reduce their energy use (such as lighter weight vehicles or more efficient interior lighting and signage systems).

Defining the responsible 'parent' body

As described above, the PTEs do not generally operate public transport services.

We do, however, procure services – including socially necessary bus services. PTEs also enter into franchising and PFI arrangements for the provision and operation of light rail services.

Subject to the separate submission by Merseytravel on the Mersey Tunnels, we accept that where we directly provide or operate services it is right that the PTE should be subject to the CRC. However, where those services are being operated or provided by the private sector (under contract to the PTE) we believe the guiding principle should be that responsibility for CRC compliance lies with that operator or service provider.

There are, however, complexities in defining these responsibilities on light rail systems.

As set out above we support the proposal to exclude light rail traction energy from the CRC. However, even with this exclusion complications can occur. As the separate UKTram submission explains, responsibility for all the energy bills that relate to a light rail system can be split between a number of organisations. In addition the user of energy on a particular aspect of a light rail system (e.g. the supporting offices) is not always responsible for paying the bill for that energy use.

Defining CRC responsibilities in these circumstances could lead to inconsistencies, disputes and bureaucracy. We therefore support UKTram's recommendation that there be a separate consultation on how the CRC might best be applied in these circumstances.

Yours sincerely

A handwritten signature in black ink that reads "Jonathan Bray". The signature is written in a cursive, slightly slanted style.

Jonathan Bray
Assistant Director
pteg Support Unit

APPENDIX ONE – CONTACT POINTS FOR THE CRC FOR INDIVIDUAL PTES

PTE	Contact	Telephone	Postal address	E-mail address
Centro (West Midlands)	John Sidebotham	0121 214 7029	16 Summer Lane, Birmingham, B19 3SD	johnsidebotham@centro.org.uk
GMPTE (Greater Manchester)	Peter Black	0161 244 1268	2 Piccadilly Place, Manchester, M1 3BG	peter.black@gmppte.gov.uk
Merseytravel (Merseyside)	Andrew Leadbetter	0161 244 1268	24 Hatton Gardens, Liverpool, L3 2AN	andrew.leadbetter@merseytravel.gov.uk
Metro (West Yorkshire)	Victoria Collinson	0113 251 7228	40-50 Wellington Street, Leeds, LS1 2DE	victoria.collinson@wypte.gov.uk
Nexus (Tyne and Wear)	Moira Rush	0161 244 1268	Metro Offices, Gosforth Industrial Estate, Newcastle upon Tyne, NE3 1ZW	moira.rush@nexus.org.uk
SPT (Strathclyde)	Keri Stewart	0141 332 6811	12 West George Street, Glasgow, G2 1HN	keri.stewart@spt.co.uk
SYPTTE (South Yorkshire)	Mike Holmes	0161 244 1268	PO Box 801, Exchange Street, Sheffield, S2 5YT	michaelho@sypte.co.uk