



PUBLIC UTILITY DISTRICT NO. 1 of CHELAN COUNTY

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Washington State Department of Ecology
Air Quality Project
Olympia, WA
Submitted via Public Comment Form

Re: State of Washington Proposed Volkswagen Beneficiary Mitigation Plan

Public Utility District No. 1 of Chelan County (Chelan PUD) appreciates this opportunity to comment on the State of Washington's *Beneficiary Mitigation Plan* (Mitigation Plan). Chelan PUD views electrification of the transportation sector as an opportunity to reduce both nitric oxide (NOX) and carbon dioxide (CO₂) emissions. We respectfully request that Ecology amend the Plan to consider utility infrastructure improvements for extreme fast charging (XFC) stations as a potentially eligible project category. Further, we suggest that Ecology consider projects eligible for funding even in counties that are not "disproportionately affected by air pollution" – as long as they facilitate technology development that is scalable for densely populated areas, and accelerate broader deployment of electric transit systems.

Chelan County PUD generates emission-free hydropower from our three hydroelectric dams in North Central Washington. Two of our hydropower projects span the Columbia River, with Chelan County on one side and Douglas County on the other. Link Transit serves fifteen communities in these counties while operating the highest-percentage clean-fueled transit program in the United States. Of its 39 Heavy-Duty transit buses, 15 are electric (essentially, running on low-cost, emission-free hydropower). Link Transit also operates five electric trolleys in the central downtown districts of Wenatchee and East Wenatchee and utilizes light and medium duty propane vehicles. With electric rates so low in Chelan County, Link Transit has future plans to convert its entire urban area bus fleet to zero emission battery electric buses. To that end, Link Transit has obtained three separate Federal Transit Administration grants totaling \$9.2 million for electric buses and expanded fast charge technology.

Link Transit hopes to couple this federal funding with an additional focus on wireless Extreme Fast Chargers to improve performance of the new fleet vehicles. Recently, Chelan PUD partnered with Link Transit, Momentum Dynamics, and Pacific Northwest National Laboratory to propose installation of three to five additional wireless Extreme Fast Chargers (XFC). The *Public Transportation Extreme*

Fast Charging Demonstration program is intended to achieve a 110% daily increase in electric bus range, while mitigating electric distribution system impacts of multiple XFC systems. The program will analyze and develop methods to mitigate the impact of multiple XFC systems simultaneously charging using a combination of system control, energy storage, and optimal scheduling. Importantly, the program would provide an excellent test bed for modeling how electrified public transit bus systems can be expanded while minimizing electric distribution feeder and connection upgrade requirements. The partners to this program plan to share results with other transit programs in the state. This project could provide valuable operational data that can be “scaled up” for larger mass transit systems.

While Link Transit is seeking funds for installation of up to five additional XFC wireless chargers to enable electric buses to be used on all routes, there is no funding yet available for improving electric infrastructure associated with XFC systems. If funding was available under Ecology’s *Mitigation Plan* for related infrastructure upgrades, it would significantly leverage current funding sources. Therefore, Chelan PUD suggests that Ecology’s *Mitigation Plan* consider funding eligibility for XFC demonstration programs for public transit, particularly with regard to distribution system upgrades. While this particular program is not in the I-5 corridor, utilities and transit providers in the I-5 corridor and across the state will benefit from seeing how Link Transit and Chelan PUD overcome the problem of providing extreme fast charging in areas where the electrical distribution system is severely constrained.

Extending a portion of the *Public Transportation EFC Demonstration* program to include technology-leading projects within Chelan County would greatly benefit electrification of public transportation fleets in large urban areas by leveraging additional matching funds. We respectfully urge Ecology to ensure the *Mitigation Plan* is broad enough to include projects in the rural parts of Washington that have a proven track record of successfully electrifying public transportation fleets.

Sincerely,



Tracy Yount
Director, External Affairs