

Annabel Drayton, Northwest Energy Coalition

Public Hearing Testimony, July 27, 2021

Thank you. Again, good afternoon and thank you, Elena, Dustin, Melanie, and all of the Department of Ecology staff, for the presentation and for your work to facilitate a public hearing. My name is Anna Drayton. I'm a policy associate with the Northwest Energy Coalition, a non-profit organization that advocates for clean, affordable, and equitable energy. We appreciate the opportunity to provide public comment and would like to express our strong support for the Department of Ecology's proposed rule to adopt California Zero-Emission Vehicle Program and Advanced Clean Trucks rule. Northwest Energy Coalition has been working to increase access to the benefits of various zero-emission transportation options. We see the Zero-Emission Vehicle Program and Advanced Clean Trucks tool as critical to that work.

In addition to the environmental, economic, and health benefits of the ZEV program and ACT rule, we wanted to highlight the benefits of the two standards as they relate to the electricity sector. As Washington increasingly relies on electricity as a transportation fuel, proactive planning for this new load is essential to reliably and affordably serve all Washington residents.

The ZEV program and ACT rule would support the utility resource planning process by providing a reasonable level of certainty for electric vehicle adoption, which helps electric utilities planned for this new load. Lastly, we did want to voice some concern that the fleet reporting requirement included in California as ACT rule is not included in the draft rule here in Washington. A robust fleet reporting requirement is essential for Washington to support or address transition to pollution-free vehicles, and would provide data that would enhance utility distribution system planning efforts.

This type of distribution system planning is vital in a transition to clean vehicles as a well-designed grid can lower bills for all customers by avoiding expensive system upgrades that provide fewer benefits. We strongly urge the Department of Ecology to open a separate rulemaking to adopt the fleet reporting requirements, ensuring Washington moves forward with the full suite of clean vehicle standards.

We plan to follow up with comments to address more specific items in the draft rule language. Again, we are supportive of this rule and do we want to thank ecology for its work to adopt these clean vehicles standards and for your consideration of the Northwest Energy Coalition's comments.