

City of Kennewick

Thank you for the opportunity to comment on the proposed Clean Vehicles Program Rulemaking, we have appreciated the public information sessions. While the sessions have been helpful for those who have participated, we are still experiencing confusion amongst agencies, dealers and manufacturers as we move forward with our current year vehicle replacements. Over the last five years we have experienced a multitude of factors affecting the supply chain that have resulted in significant changes to lead times, availability and prices. Given the current confusion amongst stakeholders regarding the rulemaking and potential changes that will not be in place until December of 2025, we are being told to expect additional delays and potential price increases.

The City of Kennewick, like many entities in Washington, have limited funding resources for vehicle replacement and have taken a balanced approach to EV implementation. We evaluate each vehicle replacement for potential EV application. On a recent review, an EV chassis would have been \$275K not including the charging infrastructure and the conventional chassis was \$95K. Dealers have told us that if we buy an EV they can most likely provide us with the additional conventional chassis that we need. In our current year truck needs we do not have a suitable application for an EV that is affordable and will necessarily hope that enough other entities purchase qualifying vehicles that allow the manufacturer to provide our needs for this and the coming years. We may also face delivery delays which will compound the issue in coming years.

The City also has a current order in for a plow truck on the State contract, and at present there are no available chassis, unless a chassis becomes available soon we are unlikely to have this vehicle for next years snow season.

The City of Kennewick strongly encourages an emergency rule or similar action that would allow

- 1) An exemption for snow & ice response vehicles and a delayed implementation of the current rules in effect to align with the implementation of the rulemaking changes currently being considered.

Respectfully,
John Noble