

November 5, 2025

**Submitted via Portal**

**Re: Comments on Advancing Zero-Emission Vehicle Adoption and Infrastructure Development in Washington State**

Clean Vehicles Team:

The Alliance for Automotive Innovation (“Auto Innovators”) appreciates the opportunity to provide comments on Washington State’s ongoing efforts to advance zero-emission vehicle (ZEV) adoption, expand clean transportation infrastructure, and accelerate progress toward statewide climate goals. Auto Innovators represents the manufacturers producing nearly all light-duty vehicles sold in the United States, as well as suppliers, technology companies, and other stakeholders driving innovation across the automotive industry.

The Alliance for Automotive Innovation is the leading advocacy group for the auto industry. We represent the manufacturers producing most of the vehicles sold in the U.S., as well as zero emission vehicle technology providers, autonomous vehicle innovators, semiconductor makers, equipment suppliers, and battery producers.

Auto Innovators supports Washington State’s leadership in advancing transportation decarbonization and recommends the state consider a suite of complementary actions that expand access, affordability, and infrastructure for zero-emission vehicles (ZEVs) across all communities and vehicle types.

Lead by Example in State and Local Fleet Electrification: Washington should continue to prioritize ZEV procurement across state and local government fleets. Adopting “ZEV-first” purchasing policies, supported by investment in charging infrastructure for public fleets, will demonstrate leadership and create early visible success stories.

Enhance Affordability and Accessibility: Affordability remains a primary barrier to ZEV adoption. Programs designed to reduce the upfront purchase and lease costs of new and used ZEVs — through meaningful, durable, point-of-sale rebates — are critical.

To maximize program effectiveness and longevity, incentive funds should be distributed broadly, providing smaller but more widely available incentives rather than large incentives for a limited number of buyers. Prioritizing incentives for new vehicles will also expand the future availability of used ZEVs, further supporting affordability and equity in the secondary market.

Reducing the total cost of ownership through lower registration fees, time-of-use (TOU) electricity rates, and utility programs that support both single-family and multi-family charging installation will further encourage adoption.

Invest in Reliable and Widespread Infrastructure: Infrastructure must come first. Consumers consistently ask, “where can I charge or fuel?” before they consider switching to ZEVs. Washington should prioritize investment in charging and hydrogen refueling infrastructure along major corridors, in rural areas, and within communities.

The state should also work closely with utilities to expand both fast-charging networks and residential charging options. Public infrastructure should emphasize reliability, accessibility, and convenience — particularly for drivers without access to home charging, including renters and residents in high-density urban areas.

Support a Diverse Range of Zero-Emission Technologies: Consumers and fleets have different operational needs, and a successful ZEV transition depends on offering multiple clean technology pathways. Battery-electric vehicles (BEVs), plug-in hybrid electric vehicles (PHEVs), and fuel cell electric vehicles (FCEVs) all play vital roles in decarbonizing the transportation sector.

Hydrogen fuel cell vehicles offer long range, quick refueling, and flexibility for both light-duty and heavy-duty applications. Hydrogen refueling stations, particularly those designed with multiple dispensers, can efficiently serve large numbers of vehicles and enable existing fuel retailers to participate in the clean energy transition. Rural corridors are especially well-suited for hydrogen infrastructure that supports a mix of vehicle types and use cases.

Advance an Equitable and Comprehensive ZEV Transition: To ensure environmental equity and broad participation, ZEV policies should support all communities — including those without access to home charging — and recognize that consumers will adopt clean technologies that best fit their needs.

Investing in both charging and hydrogen refueling infrastructure, paired with affordability measures and fleet electrification, will allow all Washingtonians to benefit from cleaner air, economic opportunity, and a resilient, forward-looking transportation system.

Finally, as a caution, Auto Innovators has concerns with proposals that would allow for direct sales of electric vehicles outside the existing franchise system.

Automotive manufacturers work closely with their franchised dealer partners to serve consumers effectively and to advance the state’s electrification goals. Franchised dealers are investing heavily in the transition to electric vehicles—upgrading facilities, training technicians, and educating customers—while providing localized sales and service support in every community.

Allowing direct sales by a subset of manufacturers would create an uneven regulatory framework, applying different rules to different companies. This approach risks undermining decades of consumer protection, fair competition, and local economic investment that the franchise model supports.

The dealership model has served consumers and the industry well for generations by offering competitive pricing, warranty and recall service, and trusted relationships within local communities. Ensuring that all manufacturers operate under the same system will promote fairness, support statewide ZEV deployment, and ultimately benefit Washington consumers through consistent access, service, and choice. While ZEVs certainly need less repairs than traditional vehicles, they do need repair and maintenance at times. Dealerships provide an extensive safety net to ensure ZEV customers get rapid repairs that get the ZEVs quickly back on the road to maintain clean driving. This safety net isn't available from non-dealership OEMs. To the extent those ZEVs require service that isn't readily available, it could poison the ZEV market.

The Alliance for Automotive Innovation appreciates the opportunity to provide these comments and looks forward to continued collaboration with Washington State agencies, utilities, and stakeholders. Together, we can advance policies that support technology diversity, infrastructure readiness, and consumer affordability — ensuring the success of Washington's transition to zero-emission transportation.

Thank you for your leadership and commitment to innovation.

Sincerely,



Curt Augustine  
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Alliance for Automotive Innovation