

WA PUD Association (WA Association)

The Washington Public Utility Districts Association (WPUDA) appreciates the opportunity to provide comments in the ZEVgreen State Dialogue Sessions.

WPUDA represents 27 of the state's public utility districts which provide water, wastewater, energy, and telecommunications services, that are critical to protect and enhance public health and welfare. As local government service providers, Washington's not-for-profit Public Utility Districts (PUDs) exist to serve the needs of their customers.

Washington law (RCW 70A.30.010) currently requires Ecology to adopt certain California regulations to maintain consistency with California's emissions standards that requires manufacturers to sell an increasing percentage of zero emission vehicles Class 2b -8, including medium and heavy trucks over the next several years in the state. This is an initial phase of a multi-year process to meet future emission standards in the state of Washington.

As Ecology considers amendments to WA Regulations with the California's Advanced Clean Trucks and Heavy-Duty Low-NOx Omnibus regulations, it will be important to keep perspective on the limitations of available vehicle technology and the impacts to the local economy resulting from the current transition schedule. Also, learning from California's efforts to implement their regulations will be essential to ensure Washington develops an appropriately proportioned Clean Vehicles Program.

Washington state public utility districts provide essential services, including power, water, and wastewater to a multitude of citizens across all demographics of the state. Many of the areas served by PUDs are in remote sparsely populated rural communities in the state. The maintenance and restoration of services requires the use of specialized Utility Service Vehicles (USV). Oftentimes, these vehicles are called upon during times of emergency, natural disasters, and extreme weather events. The distance crews are commonly required to travel to restore or stabilize services can be more than 100 miles in extreme temperatures.

Once the crews arrive at an area that requires repairs or restoration, the USV may remain on site for many hours or even days while operating auxiliary hydraulic functions, such as a digger derrick (auger), hydrovac (water-vacuum), and personnel lift (bucket) operations.

In addition to these mechanical functions, consistent with state law, these vehicles serve as shelters from the elements. This use requires extended periods of time when engine idling is required to provide heating and cooling for crews. Presently, electrified USVs cannot adequately perform these functions or meet the basic needs of utility workers as they service and repair utility infrastructure.

PUDs also share resources outside their service area. On a regular basis Utilities provide Industry Mutual Assistance to neighboring communities in Washington and other states across the country experiencing service outages due to natural disasters and extreme weather events that interrupt utility services.

PUD crews are the "First Responders" for utility service restoration and require the use of USVs with Internal Combustion Engines (ICE) to ensure timely response to necessary system repair and

maintenance. Public health and safety hinges upon the continuous operation of power, water, and wastewater utilities throughout the country and continuity of essential services is dependent upon reliable, stand-alone resources that the current zero emission vehicle technologies do not adequately support in emergency, remote, and extended use applications.

Emergency vehicles operated by military, police, fire, and other departments are exempt from the zero-emission requirement. WPUDA recommends that ICE USVs are also exempted given the nature of USVs operating to maintain and restore essential critical utility services to the public as first responders to utility outage and restoration work that is oftentimes in remote areas during extreme conditions.