

November 4, 2025



Dear Sirs and Madams,

Below/attached, please find Orange EV's response to the Washington Department of Ecology's call for public comment as part of the ZEvergreen State Dialogue Sessions.

Formed in 2012, Orange EV is America's industry-leading manufacturer of Class 8 battery-electric terminal trucks. We appreciate the opportunity to share the vast knowledge we have gained by collaborating with state agencies to help more than 325 unique customers acquire and deploy industry-leading technology.

With over 1600 vehicles deployed commercially, Orange EV's electric terminal trucks have generated more than 26.9 million operational miles and over 10 million key-on operating hours since 2015. Our vehicles are deployed in rail yards, at ports like SEATAC, and in logistics operations serving national grocery chains, big box stores, and a host of other businesses besides. Like all savvy, successful businesses, our customers are focused on their bottom lines, making decisions that make the most financial sense.

Orange EV's trucks cost less to operate, averaging more than 98% uptime, and can haul up to 180,000 lbs. They are also cooler, smoother, cleaner, and quieter than their diesel-fueled counterparts, making them the preferred piece of equipment for drivers where-ever they are deployed. The fact that they are electric means that they are not just better trucks, but that they are better trucks with zero tailpipe emissions that protect the health and safety of drivers, other employees, and residents in communities adjacent to those deployments.

Again, we thank you for providing us the opportunity to share our observations and make programmatic recommendations based upon our many years of experience. After reviewing the suggestions below, please do not hesitate to contact me if you would like to discuss any of the concepts presented in greater detail. You may reach me via phone at 785-214-1072, or by email at JasonD@OrangeEV.com.

Respectfully,

A handwritten signature in black ink, appearing to read "J Dake", written over a horizontal line.

Jason Dake
Vice President of Legal and Regulatory Services



**Orange EV's response to the
Washington Department of Ecology's call for public comment as part of the
ZEVevergreen State Dialogue Sessions**

1. What is the number one action Washington should take to promote clean transportation and/or reduce transportation emissions?

Washington's top priority should be to ensure that voucher funding levels for electric vehicles, especially heavy-duty vehicles and equipment, bring the cost of electric purchases as close as possible to cost parity with diesel alternatives. Up-front capital costs for electric vehicles and equipment remain high, even though many fleets may realize significant operational savings (\$20,000–\$60,000 per year) depending on usage. These operational savings, though real, do not decrease the initial purchase barrier, and actual savings are only clear to users after electric units are deployed. Prioritizing funding aimed at achieving cost-parity for heavy-duty electric vehicles and equipment will enable permanent emissions reductions, foster continued market growth, increase competition, and broaden adoption rates across fleets.

2. What types of programs would you like to see Washington State assess and possibly implement to meet air quality and climate targets for transportation?

Based on industry experience, Orange EV suggests that all of Washington's future state-sponsored transportation funding programs should be scrap-free programs only. Our sales team can offer many anecdotal incidents to prove how reluctant fleets are to destroy equipment in which they have invested.

If scrappage is a requirement, we recommend that fleets be allowed to destroy vehicles of any year, rather than limiting eligibility to trucks older than five years. Most fleets routinely phase out older vehicles and typically do not retain equipment beyond that point; hence they are unable to meet such restrictions.

3. What kinds of programs, other than financial support, could provide incentive to purchase and operate zero-emission vehicles and equipment?

To further encourage the adoption of zero-emission vehicles and equipment, Washington could consider implementing "Warehouse Indirect Source Rules" like those enacted in California's South Coast Air Quality Management District (SCAQMD). With these rules, also known as the WAIRE Program, the SCAQMD requires large warehouses to reduce air pollution from their operations. Warehouse owners and operators must meet annual use limitations represented by point requirements based upon the numbers of trucks arriving and departing from their facilities daily. To ensure they do not exceed their capped point allowances, owners and operators take actions that lower their on-site emissions (like using zero-emission trucks or installing charging infrastructure), paying mitigation fees, or a combination of both. Orange EV's sales in Southern California have increased by 75% among affected operators, demonstrating their effectiveness.



4. What principles for program design ensure we don't leave any Washingtonians behind in the transition to zero-emission transportation?

Program design should avoid restrictive requirements that unintentionally exclude deserving fleets or communities. For example, mandating that all funding be spent exclusively in non-attainment or disproportionately affected areas may disincentivize upgrades, since companies often manage fleets across multiple sites. Instead, allowing location flexibility, offering additional funding for priority areas, or setting target percentages for time spent in those areas can be more effective and inclusive approaches.

Similarly, rigid model year eligibility criteria and mandatory diesel scrappage can be significant barriers. Instead, programs should allow any model year diesel to be scrapped if replaced by a zero-emissions vehicle and should recognize the value of scrapped units by increasing funding amounts. Defined funding amounts and voucher-style programs (with point-of-sale discounts) are preferred by fleets, as they provide certainty and reduce risk. Such programs have proven successful elsewhere, leading to rapid adoption and easier administration, and should be considered to ensure all Washingtonians can participate and benefit from—the move to zero-emission transportation.