



PUBLIC UTILITY DISTRICT NO. 1 BOARD OF COMMISSIONERS
OF MASON COUNTY
N. 21971 Hwy. 101
Shelton, Washington 98584
MIKE SHEETZ, Commissioner
JACK JANDA, Commissioner
RON GOLD, Commissioner

January 29, 2026

Department of Ecology
Attn: Gopika Patwa
300 Desmond Dr SE
Lacey, WA 98503
Gopika.patwa@ecy.wa.gov

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RE: INFORMAL DRAFT PROPOSED CHANGES - CLEAN VEHICLES PROGRAM RULEMAKING- 173-423 WAC

Mason County PUD No. 1 appreciates the opportunity to provide comments on the proposed changes to the Clean Vehicles Program rules, Chapter 173-423 WAC.

Mason PUD 1 provides water, electricity, wastewater and telecom services to 9,000 customers in Mason and south Jefferson Counties. These essential utility services are critical to protect and enhance public health and welfare. As local government service providers, Washington's not-for-profit Public Utility Districts exist to serve the essential needs of their customers by operating reliable and safe electrical grids, safe and clean drinking water, and reliable internet and wastewater services.

The exemption for utility service vehicles is necessary for the following reasons:

1. Our service area is vast, with Mason County being over 1,000 square rural miles. Our water trucks sometimes travel 200 miles per day, tending to water systems from one end of our county to the other, and back. Our line trucks not only serve customers in Mason County but often we must travel to our service area in south Jefferson County. They can easily travel over 100 miles a day, plus idling time for line work.
2. Our trucks must idle to operate the Power Take Off system, which is the auxiliary system that operates our booms and aerial lifts, hydraulic tools, outriggers, digger derricks, cab HVAC systems, and safety lighting, often for several hours during while the work is being performed.
3. There is virtually no EV charging infrastructure in our electric service area along the Hood Canal. We are aware of just three publicly accessible Level 2 chargers and there are no DC fast charging stations except a couple privately owned Tesla chargers at a resort in Union. To have to pull off of a job site in Lilliwaup or Brinnon to drive all the way back to our shop to charge trucks would be hugely inefficient and inconvenient under normal conditions and would significantly delay outage responses in emergency situations.
4. Additionally, there would have to be operable power service for EV chargers to even work. So, if the power is already out and our crew is working to restore it, we wouldn't be able to stop and charge the trucks if there were no operable chargers during the power outage.



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5. The PUD also does not have certified mechanical staff to maintain an EV fleet. We only have 25 employees, and we contract with a local diesel mechanic for our current fleet needs. There is a shortage of utility vehicle mechanics in our industry to begin with, which limits our options, let alone trying to recruit one that specializes in EV in an area that has no EV infrastructure or other demand for these services.
6. The State could offer Mason PUD 1 \$10 million in free, brand new EV trucks in exchange for retiring our gas and diesel fleet and we would decline. That is how serious this issue is for us and how infeasible EV is for our utility vehicle fleet.

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We appreciate that Ecology included a Utility Service Vehicles (USV) exemption from the Program in this rulemaking and urge Ecology to adopt a refined definition of USV that best ensures the ability of our PUD to maintain reliable service. We also recommend incorporating the following definition for the purposes of this rulemaking. This definition is consistent with the Federal definition of utility service vehicle in 49 CFR 395.2:

WAC 173-423-040 Definitions and abbreviations.

...(12) Utility service vehicle is defined as a vehicle used in the furtherance of repairing, maintaining, or operating any structures or any other physical facilities necessary for the delivery of public utility services and emergency repairs;...

Additionally, 173-423 WAC includes Fleet reporting requirements with exemptions for certain vehicle types and we recommend Utility Service Vehicles are exempted from these reporting requirements consistent with the other vehicles exempted from this rulemaking.

In conclusion, while PUDs, including Mason PUD 1, are adopting EV and hybrid vehicles for administrative staff use and pursuing grants with state and private partners to expand charging infrastructure, that infrastructure does not yet exist in our rural service areas. Operating an EV fleet for utility vehicles is impractical and raises serious public safety concerns. We must be able to respond quickly and operate for extended periods to maintain the electrical grid and address drinking water emergencies across our 77 rural water systems. Requiring vehicles to pause during outages or daily operations to recharge, often far from available power or chargers, is infeasible in a large, rural county.

While many of our public utility customers strongly support EVs and efforts in emissions reductions, they would not accept delayed outage restoration because crews had to keep leaving the field to find charging access.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads 'Kristin Masteller'.

Kristin Masteller
General Manager