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Department of Ecology
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SUBMITTED ELECTRONICALLY

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

Franklin Public Utility District (Franklin PUD) appreciates the opportunity to provide comments on the proposed changes to the Clean Vehicles Program rules – Chapter 173-423 WAC.

Franklin PUD provides energy and wholesale 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 exist to serve the needs of their customers. Franklin PUD serves approximately 30,000 customers in the Cities of Pasco, Connell and Kahlotus, and other surrounding areas within Franklin County.

The exemption for utility service vehicles is necessary and we would like to share about a recent outage to help illustrate how the current ruling would impact the quality of life for customers.

On December 10, 2025, a severe windstorm caused an 80-foot steel stadium light pole to collapse in the City of Connell. While the City of Connell has a total population of just over 5,000 residents, the infrastructure impact of this single failure was substantial. The pole fell directly through our 3-phase line, destroying three 50-foot poles, eight crossarms, a 25 KVA transformer, and multiple guy wires. This event triggered an immediate lockout at our Connell substation at 5:45 pm, leaving over 300 customers, a significant portion of this small, rural community without electric service.

Critically, this outage affected the local High School. Without the quick response of our crews working through the night, the school would have been forced to cancel classes, disrupting the education of hundreds of students and the schedules of working families. This is particularly significant given that the City of Connell is identified by the Washington Environmental Health Disparities (EHD) Map as an overburdened community. In the census tracts serving Connell, we see high vulnerability rankings (Deciles 9-10) for socioeconomic factors and sensitive populations.

For a community already facing these disparities, a prolonged power outage is a threat to food security, health, and economic stability. To restore power, Franklin PUD mobilized nine employees

and a fleet of eight heavy-duty trucks plus an excavator. Because our crews were already repairing storm damage elsewhere, they had to travel directly to the site and work for 12 hours straight. We were able to restore service for the majority of customers by 11:15 pm, and the final customers, including the school, by 4:00 am.

Under the proposed rules, a fleet of electric service vehicles would have faced insurmountable operational constraints:

- Having charging limitations for these vehicles during outages will delay and impact the restoration efforts. Our vehicles must operate at the very moment the grid is compromised. The inability to charge during a mass outage event would leave our crews stranded and our customers without power for much longer periods of time.
- During this event, our trucks and equipment were in constant use for over 12 hours. Current EV technology cannot support the high-torque, high-energy demands of an excavator and multiple heavy-duty line trucks operating continuously in cold, high-wind conditions without significant downtime for recharging.
- Our crews were already responding to other local damage when the Connell lockout occurred. The flexibility to divert a fleet across the county without "range anxiety" or the need for a multi-hour charging stop is the difference between a one-night outage and a multi-day humanitarian crisis.

We appreciate that Ecology is including 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 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;...

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

Franklin PUD is committed to building a sustainable future, but that progress cannot come at the expense of our mission to provide reliable power. This incident is just one of many outages Franklin PUD responds to. To remain effective, we, like many other utility providers, require high-availability equipment capable of operating independently of the grid. Extending outages unnecessarily would compromise the quality of life for our ratepayers and the education of our students.

Thank you for your consideration of our comments. *Utility workers provide the maintenance, repair, and installation of the utilities that enable critical service connections to the public through electricity, water, wastewater, stormwater, and telecommunications.*

Thank you for your time and consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Victor Fuentes", with a stylized flourish at the end.

Victor Fuentes
General Manager/CEO
Franklin PUD

C: Central Files

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