



January 29, 2026

Washington State Department of Ecology*
ATTN: Gopika Patwa
300 Desmond Drive SE
Lacey, WA 98503

**DELIVERED VIA UPLOAD TO
ONLINE PUBLIC COMMENT FORM*

RE: Informal Draft Proposed Changes - Clean Vehicles Program Rulemaking - 173-423 WAC

Kitsap Public Utility District (KPUD) appreciates the opportunity to provide comments on the Department of Ecology's proposed changes to the Clean Vehicles Program rules under Chapter 173-423 WAC.

As a not-for-profit local government service provider, KPUD exists to serve and meet the needs of our customers. KPUD provides essential public services, including water, wastewater, and telecommunications infrastructure, that protect public health, support public safety, and enhance the quality of life for the communities we serve.

KPUD serves approximately 45,000 customers across Kitsap County, including rural and geographically dispersed areas. Our utility service vehicles are integral to maintaining, repairing, and restoring essential services, often under urgent or emergency conditions. For this reason, the exemption for utility service vehicles is necessary and appropriate.

KPUD's service vehicles must be capable of traveling long distances, operating for extended periods, and responding quickly to unplanned outages, infrastructure failures, and emergency situations. Many of these vehicles carry specialized equipment, tools, and materials required for field work and must remain operational during power outages, severe weather, and other emergency conditions. In these circumstances, electric vehicle charging availability may be limited or unavailable, and vehicle downtime is not an option when public health and safety are at risk. These operational realities make it difficult for electric vehicles to consistently meet the duty requirements of utility service vehicles at this time.

KPUD appreciates Ecology's recognition of these challenges through the inclusion of a Utility Service Vehicle (USV) exemption in the proposed rulemaking. **We respectfully urge Ecology to adopt a refined definition of USV that ensures public utilities can continue to provide reliable service to their customers without unintended operational impacts.**

KPUD recommends incorporating the following definition for purposes of this rulemaking, which is consistent with the federal definition of a 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;...

Strengthening Kitsap communities through responsive and sustainable utility services.

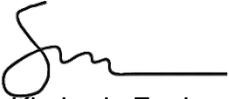
Kitsap Public Utility District
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Additionally, Chapter 173-423 WAC includes fleet reporting requirements with exemptions for certain vehicle types. KPUD recommends that utility service vehicles also be exempted from these reporting requirements, consistent with other vehicles exempted from this rulemaking, to avoid unnecessary administrative burden and to reflect their unique operational role.

In conclusion, KPUD supports the goals of the Clean Vehicles Program and remains committed to environmental stewardship while fulfilling our responsibility to deliver safe, reliable, and affordable utility services. Ensuring a clear and comprehensive utility service vehicle exemption is essential to maintaining system reliability, responding to emergencies, and protecting public health and safety across our service area. We appreciate Ecology's consideration of these comments and look forward to continued collaboration as the rulemaking process moves forward.

Thank you for the opportunity to provide input on this important rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimberly Funk', with a horizontal line extending to the right.

Kimberly Funk
Senior Public Relations Manager