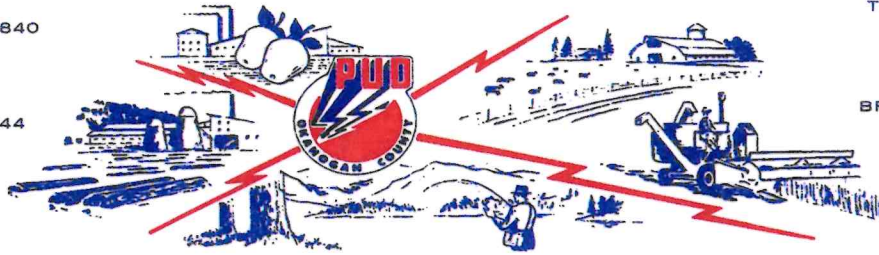


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PUBLIC UTILITY DISTRICT NO. 1 OF OKANOGAN COUNTY

January 29, 2026

Department of Ecology
ATTN: Gopika Patwa
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Lacey, WA 98503
Gopika.patwa@ecy.wa.gov

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

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

PUD No. 1 of Okanogan County provides essential energy and telecommunications services to more than 17,000 customers across Okanogan County. Our service territory spans nearly 3,000 square miles and includes approximately 130 miles of transmission line and nearly 2,000 miles of distribution line, much of which is in rugged and remote terrain. Because there is limited system redundancy, an outage on a main line can leave customers without power until crews are able to reach the site. Okanogan County is also prone to severe weather, including extremely cold temperatures, raising serious concerns about the ability of electric utility vehicles to access remote locations, restore power, and retain sufficient charge for crews to safely return home.

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.

Thank you for your consideration of our comments.

Randy Bird 
General Manager