

## Sheila Corson

We at Mason PUD 3 appreciate the opportunity to provide comments on the proposed changes to the Clean Vehicles Program rules, Chapter 173-423 WAC. PUD 3 urges Ecology to adopt a definition for utility service vehicle that is consistent with 49 CFR 395.2. PUD 3 provides both power and broadband services to a majority of Mason County, utilities that are critical for public safety, health, and welfare. We are a not-for-profit utility owned by the more than 36,000 customers we serve.

As you no doubt have seen and likely have experienced, utility service interruptions can be more than just an inconvenience. Power outages can result in a loss of wages, education, critical health appointments, and more. Especially in extreme circumstances with heat waves and cold snaps, outages can also result in loss of life. Broadband services are for more than streaming and gaming, but also for calling 911 in an emergency or connecting with telehealth or other services.

In Mason County, we serve areas that are difficult to access on a blue-sky day, let alone in pouring rain, gale-force winds, ice, and snow. For the Tahuya Peninsula, Lake Cushman, or other far-removed areas, our crews travel long distances over extended periods of time to both prevent and respond to outages. Were we to convert our service vehicles to electric, we would be unable to charge during the times we are working to restore electricity – the most critical time to have our vehicles operating. Extreme temperatures significantly affect electric vehicle battery performance, with cold weather primarily reducing driving range (often 20-30% or more) due to sluggish chemistry and cabin heating demands, while extreme heat accelerates long-term battery degradation. One additional issue: The types of electric service vehicles we would need to reliably serve our customers are not yet available. For the safety and reliability of the electric grid and broadband system, the utility service vehicle exemption is greatly needed, along with an appropriate definition.

We appreciate that Ecology is including a Utility Service Vehicles (USV) exemption from the Clean Vehicles Program through rulemaking. We urge Ecology to adopt a refined definition of USV to best ensure that we can serve our customers in any conditions to maintain reliable service, both in preventing outages and responding to them. Below is the definition we recommend, along with the recommendation of many of our utility colleagues:

### WAC 173-423-040 Definitions

(12) Utility service vehicle is defined as:

1. 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, including the furnishing of electric, gas, water, sanitary sewer, telephone, television cable or community antenna service, and broadband-internet and cellular telephone operations;
2. A vehicle used while engaged in any activity necessarily related to the ultimate delivery of such public utility services to consumers, including travel or movement to, from, upon, or between activity sites including occasional travel or movement outside the service area necessitated by any utility emergency as determined by the utility provider); and
3. A vehicle, except for any occasional emergency use, operated primarily within the service area of a utility's subscribers or consumers, without regard to whether the vehicle is owned, leased, or rented by the utility.

We also recommend that USVs be exempted from the reporting requirements in 173-423 WAC, consistent with other exempted vehicles.

Thank you for your consideration of these comments. Utilities services are critical for every community to thrive and to weather the storms as they come, 24/7.