

Sheri D Nelson



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Department of Ecology

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RE: Request for the exemption and refined definition of “Utility Service Vehicle” (USVs) under the Clean Vehicles Program rules – Chapter 173-423-WAC.

The Washington Rural Electric Cooperative Association (WRECA) represents the interests of consumer -owned electric cooperatives who provide electricity in some of the most remote areas of Washington state. Some of our cooperatives also offer additional infrastructure services in their regions including water and Broadband. We serve an average of seven customers per mile of distribution line over 25% of Washington’s land mass. Our member cooperatives serve schools, hospitals, tribal communities, homes and small businesses, the majority of which are in vulnerable rural regions throughout the state. As such, our need to provide reliable emergency restoration and maintenance is paramount to the public safety of our communities.

This overwhelming public need for emergency response has been evident in recent events such as the current severe flooding in Skagit county, the wildfires that directly impacted our coop utilities in Okanogan and Nespalem or the recent windstorm that impacted several of our coop service areas up and down the I-5 corridor in Pierce and Snohomish counties. In each of these instances, WRECA electric cooperatives were in the trenches providing restoration and life sustaining services to secure public safety. Our coops not only service their regions, but they partner with additional emergency management services such as fire, medical and law enforcement regardless of whether it is an emergency or if their assistance is simply requested. Our cooperative utilities are truly first responders as they heed the call to serve their communities, both individual families, homes and business as well as our partners in public safety.

It is with this in mind that we request an exemption of Utility Service Vehicles (USVs) within the Clean Vehicles Program rules in Chapter 173-423-WAC.

First, let us be clear. Washington Rural Electric Cooperatives fully support Washington’s intent to reduce carbon emissions. We have made huge strides and continue to explore opportunities within our operations for further reductions and are committed to the eventual transition to Net Zero. However, the current mandated policy within WAC 173-423-070 identified as a manufacturer’s standard, has unintentional adverse effects on utility operations and safety. We understand the Advanced Clean Trucks (ACT) is a requirement for truck manufacturers to sell an increasing share of electric vehicles. Yet the current technology, infrastructure, and economic value of electric USVs is not mature enough and until such time as the electric replacements have been proven and can fully service



the needs of industry, we request an exemption. To reach the same operational capability that is available in a diesel Internal Combustion Engine (ICE) truck, utilities need to incorporate two electric vehicle chassis trucks to equate to the same amount of power. This does not take into consideration the need of charging infrastructure to operate during outages. The diesel range of an internal combustion engine is 400-700 miles per tank versus the electric vehicle range of 100-200 miles which does not include the power drawn when the vehicles is required to use the auxiliary equipment such as a boom or outrigger.

As a reminder, the majority of our service areas are remote with many thousands of miles of distribution lines, and few if no electric charging stations. Given the adverse weather conditions, especially in the summer and winter months, the electric vehicle alternative is simply not an option to provide safe, efficient, and proven service for our communities. If we add consideration with the limited nature of electric batteries in cold or wet climates and the reduction of their efficiencies at the very time our utilities need the dependability of fully functioning equipment, the argument is further made for an exemption on Utility Service Vehicles.

The market remains limited to (2) manufacturers approved to sell utility service vehicles neither of which have established service records. In the year 2030 no diesel internal combustion engine may be sold, registered, or leased in Washington state. The current lead time for delivery of an internal combustion engine vehicle bumps up against the 2030 deadline with no real alternative for our crews. Beginning in the model year 2025, if a truck does not meet the CA vehicle emission standards, then the manufacturers cannot lease, rent, or sell the vehicle nor can utilities register it in Washington state. An electric service vehicle has an even longer delivery period of nearly three years. This is an untenable timeline, which will cause our workforce to use unproven, unreliable equipment on the job. This equates to a worker safety issue; our crews need reliable trucks in order to get them to their destination in the worst of times and in some of the most challenging terrain.

Our crews are committed workers who serve their communities with pride. They, like our cooperative members, live, work and play throughout their service regions. They strive to serve in hostile weather conditions to get power restored or to maintain our transmission lines for the future. They work long hours to accomplish their jobs and often seek shelter in their trucks while working. The demands on these service vehicles is immense not only to provide power to operate the hydraulic boom and outriggers, but remain constantly running in order to allow the equipment to work. The expectation to place our crews in a vehicle which is unproven with vast limitations is irresponsible.

We respectfully request an exemption in WAC 173-423-070 until such time as electric service vehicle trucks can match the reliability and rapid-response capabilities of traditional service utility vehicles, in order to provide public safety and protect our workforce. We support a phased, real world situationally driven transition based on range, reliability, operational duration and functionality that either meets or exceeds those offered by emission compliant ICE vehicles today.



WRECA

Washington Rural Electric
Cooperative Association

Please feel free to contact me directly at 360-580-9502 or at snelson@wreca.coop to answer any questions or to provide additional information.

We appreciate the opportunity to provide these comments.

Regards,

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WRECA Executive Director

