

## Tim Simpson

The Asotin County Public Utility District (PUD) appreciates the opportunity to provide comments on the proposed changes to the Clean Vehicles Program rules – Chapter 173-423 WAC. Our PUD provides water, wastewater and energy services to our community, that are critical to protect and enhance public health and welfare. As a local government service provider, we exist to serve the needs of our customers.

The Asotin PUD serves nearly 8,000 customers in Asotin county with a population base of over 20,000. The exemption for Utility Service Vehicles (USV) is necessary. Our service vehicles won't meet the USV duty requirements for our service area and there would be operational constraints associated with having to charge vehicles, especially during emergencies.

We appreciate that Ecology is including a 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 USV's are exempted from these reporting requirements consistent with the other vehicles exempted from this rulemaking. Thank you for your consideration of our recommendations.

Sincerely, Tim Simpson, General Manager

Commissioners:  
JUDY RIDGE  
DON NUXOLL  
GREG McCALL



General Manager:  
TIM SIMPSON  
Auditor:  
BOB SISCHO  
Treasurer:  
LACEY SMITH

# PUBLIC UTILITY DISTRICT

A S O T I N C O U N T Y

PO Box 605 • Clarkston, Washington 99403-0605 • 509-758-1010 • FAX 509-758-1958 • www.asotinpod.org

January 29, 2026

Department of Ecology  
ATTN: Gopika Patwa  
300 Desmond Dr SE  
Lacey, WA 98503

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

The Asotin County Public Utility District (PUD) appreciates the opportunity to provide comments on the proposed changes to the Clean Vehicles Program rules – Chapter 173-423 WAC. Our PUD provides water, wastewater and energy services to our community, that are critical to protect and enhance public health and welfare. As a local government service provider, we exist to serve the needs of our customers.

The Asotin PUD serves nearly 8,000 customers in Asotin county with a population base of over 20,000. The exemption for Utility Service Vehicles (USV) is necessary. Our service vehicles won't meet the USV duty requirements for our service area and there would be operational constraints associated with having to charge vehicles, especially during emergencies.

We appreciate that Ecology is including a 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 USV's are exempted from these reporting requirements consistent with the other vehicles exempted from this rulemaking. Thank you for your consideration of our recommendations.

Sincerely,

Tim Simpson  
General Manager