

**David Plotz**

See Lewis County PUD's comments attached.

# *Lewis County*

## PUBLIC UTILITY DISTRICT

P.O. BOX 330 CHEHALIS, WA 98532 • 321 N.W. PACIFIC AVENUE CHEHALIS, WA 98532  
(800) 562-5612 • (360) 748-9261 • FAX (360) 740-2455 • [www.lcpud.org](http://www.lcpud.org)

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Department of Ecology  
ATTN: Gopika Patwa  
300 Desmond Dr SE  
Lacey, WA 98503  
[Gopika.patwa@ecy.wa.gov](mailto:Gopika.patwa@ecy.wa.gov)

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

Public Utility District No. 1 of Lewis County (Lewis County PUD) appreciates the opportunity to provide comments on the proposed changes to the Clean Vehicles Program rules – Chapter 173-423 WAC.

Lewis County PUD provides energy and telecommunication services that are critical to protect and enhance public health and welfare. As local government service providers, Washington's not-for-profit Public Utility Districts exist to serve the needs of their customers.

Lewis County PUD supports an exemption for utility vehicles from the Clean Vehicles Program due to the unique operational demands of serving a large, rural service territory. Lewis County spans approximately 2,436 square miles, and the PUD provides electric service to about 35,000 customers across nearly 3,000 miles of distribution line, much of which is located in remote and difficult-to-access areas.

Reliable storm response is critical to public safety and system reliability. During major weather events, utility crews must travel long distances, operate continuously for extended periods sometimes exceeding 48 hours uptime, and access areas where power is unavailable or has been de-energized. In these conditions, there are currently no practical electrical backup options to charge fleet vehicles, which would significantly limit response capability. Requiring electric utility vehicles without reliable charging infrastructure during outages would diminish the PUD's ability to restore power quickly and safely.

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.

An exemption for utility vehicles recognizes the essential nature of electric service, the geographic realities of rural public utilities, and the current limitations of vehicle and charging technology. Lewis County PUD remains supportive of environmental goals and will continue evaluating cleaner vehicle options as technology, infrastructure, and system resilience improve, while ensuring uninterrupted service to its customers.

Thank you for your consideration of our comments.



David Plotz  
General Manager

