

February 2, 2026

Department of Ecology

ATTN: Gopika Patwa

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

Grant County Public Utility District (Grant PUD) appreciates the opportunity to provide comments on the proposed changes to the Clean Vehicles Program rules in Chapter 173-423 WAC.

Grant PUD provides electric power and wholesale fiber telecommunications services that are critical to protecting public health, safety, and welfare. As a local government, not-for-profit public utility district, Grant PUD exists to serve the needs of the residents, businesses, and agricultural community of Grant County.

Grant PUD serves over 50,000 electric customers across a large, predominantly rural service territory. Grant County is over 2,791 square miles making the county one of the largest in Washington State by total area. The exemption for utility service vehicles (USVs) is necessary to ensure Grant PUD can continue to provide safe, reliable, and timely electric service. Grant PUD's utility service vehicles are essential for responding to outages, maintaining transmission and distribution infrastructure, supporting substations, and performing emergency repairs often over long distances and in remote areas.

Electric utility service vehicles must be capable of:

- Traveling significant distances across the county to reach dispersed infrastructure;
- Operating for extended periods during emergency and outage conditions;
- Remaining available when charging infrastructure may be limited or unavailable, including during power outages or severe weather events; and
- Carrying specialized equipment and materials required for line work, substation maintenance, and system restoration.

These operational realities make it difficult for certain utility service vehicles to meet the duty requirements contemplated under the Clean Vehicles Program at this time. Maintaining flexibility in fleet composition is essential to Grant PUD's ability to meet its statutory obligation to provide reliable electric service.

Grant PUD appreciates that the Department of Ecology is including an exemption for Utility Service Vehicles in this rulemaking and urges Ecology to adopt a refined definition of USV that best ensures utilities can maintain reliable service for their customers.

Grant PUD recommends incorporating the following definition for purposes of this rulemaking, which is consistent with the federal definition of "utility service vehicle" in 49 CFR 395.2:

**WAC 173-423-040 Definitions and abbreviations**

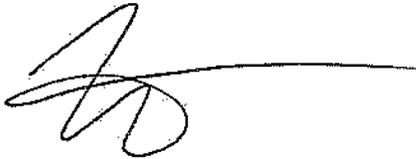
...(12) *Utility service vehicle* is defined as a vehicle used in the furtherance of repairing, maintaining, or ~~operating any structures or any other physical facilities necessary for the delivery of public utility services,~~ including emergency repairs; ...

In addition, Chapter 173-423 WAC includes fleet reporting requirements with exemptions for certain vehicle types. Grant PUD recommends that Utility Service Vehicles also be exempted from these reporting requirements, consistent with other vehicles excluded from the program.

In conclusion, Grant PUD supports the Department of Ecology's efforts to reduce emissions while ensuring that critical public services remain reliable and responsive. Preserving a clear and workable exemption for utility service vehicles is essential to maintaining electric reliability and public safety in Grant County.

Thank you for your consideration of these comments.

Sincerely,



Matthew Harris  
Senior Policy Analyst  
Government Affairs  
Grant PUD