



Grays Harbor Public Utility District #1
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January 29, 2026

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

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

The Gray Harbor PUD appreciates the opportunity to provide comments on the proposed changes to the Clean Vehicles Program rules – Chapter 173-423 WAC.

Our utility provides energy and wholesale telecommunications services to over 45,000 customers on the Washington coast. These are services 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. Our mission is to "serve our community with high value utility services at the lowest practical cost." It is our belief that a requirement that utilities adopt an all-electric vehicle fleet would put the fulfillment of that mission in jeopardy.

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.

While electric vehicles can be effective modes of transportation, we believe that requiring utility vehicles to use EV systems is not one of those situations. In addition to significant cost increases, the time needed to recharge vehicles could mean delays in restoration work, and more time for our customers to be left in the dark without heat and other critical services.

Late last year, Grays Harbor experienced two outage situations that demonstrate the need for this exemption. During a November windstorm power was lost to over 30-thousand customers. Less than a month later, over 20,000 customers were impacted by a significant weather event. In that time, five line crews and their trucks and six service crews and their trucks were in the field making repairs to restore power, working non-stop until full restoration was complete. The need to recharge electric line and service trucks would have extended those outages significantly.

To help incorporate the needs of Public Utility Districts into state code, 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 would further recommend that Utility Service Vehicles are exempted from these reporting requirements consistent with the other vehicles exempted from this rulemaking.

Thank you for your consideration of our comments and your support of the vital role Public Utility Districts play in the everyday lives of hundreds of thousands of Washington residents.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ian Cope', with a long horizontal flourish extending to the right.

Ian Cope
Communications and Government Relations Director
Grays Harbor Public Utility District #1