

Daniel Fagerlie

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Department of Ecology

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

I, Dan Fagerlie, President of the Ferry PUD#1 Board of Commissioners, appreciate the opportunity to provide comments on the proposed changes to the Clean Vehicles Program rules – Chapter 173-423 WAC.

Our nonprofit PUD is empowered by state law to deliver electricity for the safety and welfare of our customers in the coldest, ruggedest, most impoverished, and sparsely populated region of the State of Washington. We cover the poorest and most remote NE portion of Okanogan County, the center of the Colville Indian Reservation, and western Ferry County.

When temperatures are hot in the summer, or -20 to -40° F (below zero) in the winter, electricity is not a luxury. It is a matter of life or death. The northern section of our service area is served by one BPA line coming over the highest pass, Sherman, in the State of Washington. And the southern portion, serving a good portion of the Colville Indian Reservation, is served by a BPA line coming in from Grand Coulee Dam. This is a separate line, not connected to northern area. As such, there is no redundancy or back up power.

When we have an outage such as a 10+ day windstorm outage in 2012, Or long outages caused by fires or wind in 2014, 2015, 2018, and 2021, it is all hands-on deck!

Every vehicle we have is then being used to either repair poles, lines, or run supplies and food, or provide shelter to field crews and/or mutual aid crews.

During times like these, which we see often, there is no electricity to recharge any vehicles. In cold weather, when it gets below zero, electric vehicles parked outside such as many of ours, do not charge readily even if we had electricity to plug into. E vehicles have dramatically shorter range when they also must provide heat in cold weather. We have already experienced that in our county with an electric school bus that didn't make a run with the kids in the winter that was just 40+ miles. Heat had to be shut off and the kids were cold..

Some of our electric lines, especially on the Colville reservation, are 120+ miles round trip from our office or shop. In extreme weather being able to get back to the shop or office, with heat in the vehicle, is a matter of life and death. This is true not only for our customers in getting the lines and service repaired, but to our employees, who would like to get home with their families safe and sound.

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 at all times. People's lives, as well as emergency services, hospitals, schools, and businesses providing food and vital services all depend on it. When electricity is off, we must keep vehicles running through extreme weather conditions night and day to get it back on!

For the sake of keeping the lights on for all the people of our Region, please incorporate 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.

Thank you again for the chance to comment. We sincerely hope you will incorporate this definition change, as lives depend on it in our region more than anywhere else in the State.

Sincerely,

Dan Fagerlie

President, Ferry PUD #1