Sheri Nelson

Gopika,

Please accept the attached as a comment letter from WRECA

re: Draft rule for Chapter 173-423-WAC (Clean Vehicles Program).

WRECA
Washington Rural Electric Cooperative Association

March 30, 2026

Via Electronic Mail (GPAT461@ecy.wa.gov)

Department of Ecology
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Lacey, WA 98503
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RE: Clean Vehicles Program Rulemaking – Chapter 173-429 WAC

On behalf of the Washington Rural Electric Cooperative Association (WRECA), we respectfully submit the following comments regarding the Department of Ecology's consideration of amendments to Chapter 173-423 WAC (Clean Vehicles Program Rule). WRECA represents not-for-profit, community owned electric cooperative utilities throughout Washington state, the majority of which are located in remote areas of the state. As such, we have a unique and essential voice on this rulemaking.

Additionally, some of our members provide services such as water, and Broadband in their communities. We serve an average of seven customers per mile of distribution line over 25% of Washington's land mass. Member cooperatives serve schools, hospitals, tribal communities, homes, and businesses, in vulnerable rural regions throughout the state. As such, our need to provide reliable electricity and emergency restoration is paramount.

During power outages, time is a critical factor for public safety. Refueling (ICE) takes 10 minutes at any standard fuel station which are readily available as opposed to Charging (EV USV) which will demand 1.5 – 2.5 hours on high- speed Level 3 chargers. This rises to 9-12 hours on Level 2 chargers. Given our cooperative regions, there are many areas with NO charging stations available which adds to the downtime and impacts on our workforce. Utility Service Vehicles require prolonged vehicle use such as a firetruck and cannot halt operations to locate a charging station.

The Department of Ecology needs only to consider recent events such as the current severe flooding in Skagit County, the wildfires during the summer of 2025, the November 2024 windstorm that left multiple counties without power for several days, or the devastating crisis in Cuba who remains without electricity. In each of these instances, the

essential role of reliable electricity and the critical nature of WRECA electric cooperative members is evident. Our work is the work of first responders as we provide restoration and life sustaining services to secure public safety.

*In most regions, Utility companies are included in the WA State Emergency Management Plans and with the WA Military Department and are **identified as an essential service**. WRECA implores the Department of Ecology to align their definitions with the remaining state agencies. WRECA members are also identified in the BRE Registration program which expedites business access to impacted areas to enhance response and recovery operations.*

There is an operational gap of range and reliability between the USVs types. The current history of a diesel range USV is 400-700 miles per tank which allows our workers to gauge and plan their work orders, so they remain safe working through emergency situations. The EV USVs are unpredictable due to the uncalculated impacts inclement weather has on batteries. Manufacturers claim a battery can go 110-230 miles, yet the real-world utility performance notes only 60-65% of these figures. In some of our regions such as Nespelem Valley, a lineman can travel over two hundred miles to get to the problem area one-way.

Our workforce needs calculated reliability in their service vehicles to serve the public.

We understand Washington law (RCW 70A.30.010) currently requires Ecology to adopt certain California regulations that demand manufacturers increase sales of medium and heavy trucks (Class 2b -8) with zero emissions. While we are aware this is targeted at manufacturers, there is and will continue to be direct impacts on small and large utilities who need to purchase these vehicles in real time to provide our essential services. We were extremely disappointed with the outcome of the first round of draft language and your notation that *due to requirements within the federal Clean Air Act, an exemption for service USVs cannot be included*. As noted, California has indefinitely paused the Advanced Clean Trucks (ACT) and Omnibus standards.

*We are aware there **are processes** to create exemptions of USVs in CA currently and we request WA DOE consider offering the same exemption process or create an outright exemption for utility service vehicles.*

WRECA members **support** the intent to reduce overall carbon emissions statewide and are currently making long-term plans in our operations. However, there is procurement gridlock and the current supply chains cannot support a mandated rollout without compromising fleet readiness nor can utilities incur the aggressive timelines and costs.

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The business plan for USVs purchases occurs several years in advance to budget for the costs and create a depreciation schedule.

The ICE lead time is 6-12 months for a USVs to be built to the specs needed for service; the EV lead time is currently double that timeframe. In addition, the current EV chassis option from manufacturers carries a massive price premium that will directly impact on our operational cost and hence, our community's affordability. In addition, a standard diesel chassis costs an average of $80,000 - $130,000 while an EV chassis average cost is $250,000 - $350,000.

A utility service vehicle (USV) is NOT a standard utility truck, nor should it be classified as such. There are additional demands for these service vehicles just as there are on a firetruck or a military vehicle. Components of the truck such as auxiliary hydraulic functions, digger derricks, and personnel lift bucket operations each contribute additional demand on the power source of the vehicle to complete critical tasks. The current EV USVs are limited due to the increased demand needed to run the auxiliary functions.

The additional service demands of a utility service vehicle (USV) must be considered first and foremost so they can continue to perform their required tasks. Currently, manufacturers have not been able to produce EV USVs that can meet the distance, power, reliability needs as required. ***As such, Washington state should allow an exemption on USV's until such time as the market offers proven replacements***.

In closing, WRECA respectfully requests the Department of Ecology exempt USVs from WAC 173-423-060 and any additional amendments from the Clean Vehicles Program. This has already been done for other emergency vehicles for police, military, and fire departments. Utilities are identified as an essential service yet the very tools we need to complete our mission of providing and restoring electric power are being threatened. **Until such time as electrification technologies can meet the need of full scale USV demands, WRECA believes the critical public safety role and expectation on rural electric cooperatives and utility partners, warrants an exemption.** Our commitment and mission to serve our communities, especially in times of emergencies, hinges on our ability to operate the necessary equipment for the job without limitation or interruption.

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Washington Rural Electric Cooperative Association

Feel free to contact me if you have any questions or need additional information.

Sincerely,
Sheri D Nelson

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