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Climate Pollution Reduction Program
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August 13, 2026

Submitted online via: [Rulemaking- Chapter 173-423 WAC Clean Vehicles Program Rulemaking: Comment Period](#)

Re: Request for comments on Chapter 173-423 WAC – Clean Vehicles Program (CVP)

Dear Ms. Patwa and Department of Ecology CVP Rulemaking staff:

Thank you for the opportunity to comment on the Clean Vehicle Program rulemaking. Our four undersigned utilities, Avista, Seattle City Light, Snohomish County PUD, and Tacoma Power, (“joint utilities”), which collectively serve over 2.5 million residents in Washington, are active participants in several Department of Ecology (Ecology) rulemaking processes. We appreciate that Ecology in this rulemaking is seeking to help utility grid planning by providing authority to Ecology to conduct surveys of fleets.

We are commenting only on proposed amendments to WAC 173-423-083’s fleet reporting requirement.

1. We support the frequency of the fleet survey and the applicability provisions in Section 1 and ask Ecology to commit to the survey (by revising subsection 1(a)(3): “Ecology may request this information...” to “Ecology *will* request this information”).
2. We support the shortening of the survey questions in Section 3.
3. We support the new section 3(d) on fleet electrification planning but respectfully request this section include more specificity and:
 - a. Request information on short-, medium- and long-term plans (e.g., five, ten and twenty years) especially for electric vehicles and charging. Building substations and other distribution equipment takes years to plan and implement, so it is important to have fleets think long-term to assist utility grid planning.
 - b. Request information on whether the fleets plan to use only their home base for infrastructure or instead use public charging or hydrogen refueling located at away-from-home shared depots, or a combination of these options. For heavy-duty and medium-duty electric vehicles, the emerging trend is toward shared depots, so learning only about home base charging likely will not be enough to help with electric utility grid planning.

- c. Request fleets mandatorily report their plans for off-road vehicle electrification instead of making it optional. Off-road EVs are a significant existing and emerging type of transportation electrification at warehouses, factories, mines, campuses and other locations.

In addition, Ecology's survey should not duplicate the Electric Power Research Institute's (EPRI) surveys on this topic in order to minimize the impact on our customers. We seek assurance from Ecology that Ecology and EPRI will collaborate and not duplicate each other's work on surveying of fleets.

We respectfully ask Ecology to confirm that detailed address-level data collected by Ecology in the surveys will be shared with utility grid planners under confidentiality agreements with an amendment to the proposed regulation confirming this. This data is needed for utility grid planning and the building of substations and other electric utility distribution system equipment to support electric transportation. In addition, we respectfully request that Ecology work with industry and share with Washington utilities and other parties the aggregated anonymized data indicating where electric vehicle charging is expected to occur in small geographic areas over multiple expected timeframes.

The joint utilities appreciate the opportunity to comment on this draft regulation and appreciate the importance of Ecology's work on this matter. We are encouraged by Ecology's willingness to harmonize with California and Oregon's Clean Vehicle Programs and share Ecology's interest in rapidly expanding transportation electrification to achieve Washington's climate goals.

Please reach out to Landon Bosisio at Landon.Bosisio@seattle.gov for any questions or to discuss these comments further.



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