

Travis Nelson

This is Travis Nelson with the Washington State PUD Association. Last name spelled N-E-L-S-O-N. And I am here to represent the Washington State Public Utility Districts. In the interests of the requirements for electric service vehicles for our bucket and line trucks that go out and work in adverse conditions, much like those that you're seeing right now in the fires in Spokane. The requirement as currently stated, I recognize as Vern. Adoption of the 2010 standards, so we have a backstop. For emission standards, but on the other hand, also the larger bigger picture for Ecology's emission standards is going to affect more than that, and it's going to affect procurement. We've experienced some of that issue in a few of our vehicles that our members have tried to register. That, um, some of the...DOL agents had some confusion And didn't allow them to register those vehicles at first. That's been since resolved, but I anticipate that's going to continue. But the bottom line is, is that utility service vehicles need accommodation. For the considerations around zero emission standards, because these are the vehicles that keep the electricity flowing. And in California, AB 1594 in 2023 directed California Air Resources Board. To do just that, to provide accommodations for utility vehicles. I urge Ecology to follow suit with that, and also examine how we may be able to find some accommodations for our utility service vehicles in the state of Washington to have the same kind of considerations. Let me be clear, though, we're absolutely not opposed. We represent electrical utilities, so we're by all means we're supportive of the overall initiative, but we request that ecology consider adopting the AB 1594 approach that California already has and also examine how the identity clause in the Clean Air Act, and 177 applies, because I would be interested to know if In fact, the approach of not allowing for that exemption or that option would in fact be out of compliance with the identity clause because you wouldn't be actually following California standards. So thank you. I appreciate the opportunity to provide this comment.