



TACOMA PUBLIC UTILITIES

3628 South 35th Street

Tacoma, Washington 98409-3192

July 10, 2015

Mr. Tony Usibelli and Mr. Peter Moulton  
Washington State Department of Commerce  
P.O. Box 42525  
Olympia, WA 98504-2525

Subject: Tacoma Public Utilities Comments on for Use of Alternative Fuels and Vehicles by Local Governments -- Chapter 194-29 WAC

Dear Mr. Usibelli and Mr. Moulton:

Thank you for the opportunity to provide comments on Final Draft Rule Chapter 194-29 WAC. Tacoma Public Utilities operates a fleet of about 1100 vehicles consisting of heavy, medium and light duty vehicles, as well as off-road equipment. We began introducing hybrids into our pool car fleet in 2003. Today 11.7 percent of our entire fleet is hybrid or electric and 70 percent of our motor pool vehicles are hybrid, hybrid electric, or all electric. Our Fleet Services group purchases B20 for use in our diesel vehicles, and we have installed 16 charging stations, six for fleet use.

Given Tacoma Public Utilities commitment to growing a green fleet in a financially sound manner, we are generally well positioned to meet the requirements of the proposed Alternative Fuels and Vehicles Rule. However, we do have the following suggested changes.

New Section 194-29-070 (1) (d). We recommend that the determination of practicability for procurement of natural gas vehicles should include consideration of lifecycle costs. One approach would be to remove Subsection (d), as procurement of natural gas-fueled vehicles is covered in Subsection (c).

New Section 194-29-070 (2) (b). Based on our research, E85 is currently not commercially available for practical fleet use. Therefore we would suggest, the specific reference to E85 be removed and replaced with language "requiring the highest commercially available percentage of ethanol".

New Section 194-29-070 (3). We recommend that the reference to "maintenance facilities" be removed. Maintenance facilities are not defined in the proposed rule. We believe encouraging installation of electric vehicle charging infrastructure in all fleet parking is adequate and appropriate.



Lastly, we have questions regarding the definition of the "social cost of carbon" in New Section 194-29-020 (12). We are familiar with federal social cost of carbon methodology, but are unsure of the State's methodology and the degree to which it conforms to various federal agencies' published estimates. We recommend that the definition should reference available federal methodologies.

Thank you again for this opportunity to provide input into the rulemaking process.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Rennie". The signature is written in black ink and is positioned below the word "Sincerely,".

Lisa Rennie  
Senior Manager for External Affairs