Townsend, Erle

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To: DEP Rule Comments

Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting)

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As a Professional Engineer, I look at credible data, specifications and testing results all the time. In my opinion fully electric cars are not prime time ready for many reasons. In Maine at the present time they are even less effective simply because their range in the winter when heating elements and defrosting systems draw huge electric currents. Then there is the cold temperatures which the batteries don't like which further reduces the range. All in Winter driving reduces their range by 30% plus. Thus what is typical of an EV advertised range of 250 miles gets reduced to 175.

Maine should not be subject to the California law, we need to wait until the technology is ready. Solid state batteries hold great promise of reducing production costs and dramatically increasing range but these technologies will not be credibly available for at least several years. Maine should hold off on establishing any mandated percentage of new EV car sales until the technology as well as charging stations has a chance to mature.