

Townsend, Erle

From: Brian <bcjones5675@gmail.com>
Sent: Friday, January 19, 2024 11:31 AM
To: Cayting, Lynne A
Cc: Hinkel, Bill; Townsend, Erle
Subject: Re: ACC II And Opposing Comments and Questions Below

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The Potential EV Mandate on the State of Maine, January 19, 2024

While I have high regard for the credentials of the BEP and respect the enormous amount of work presented in regard to this potential mandate, I have serious concerns I ask you to consider before voting.

First, the process. Only 150 people sign a petition, then 7 unelected members of the BEP get to decide what a million people drive? This is not government by the people, for the people. It is dictatorial overreach, completely unacceptable. It will not stand.

Second, regardless of credentials, we can all make mistakes. I am an engineer, worked in basic research and I have made mistakes. It happens. Is it possible there are mistakes in the assumptions made, the charts? Are you about to make a mistake if you vote yes? I think so.

“in.... testimony by proponents of the EV rule, there are hundreds, if not thousands, of adverbs projecting actions not currently founded in fact, that the proposed rule—will, should, could, can, projecting, etc. will improve emissions and not harm citizens economically. These comments, these hopes, these crystal-ball dreams should not be the basis for such a significant change to Maine and BEP regulations on new car sales.”^[1]

In the event you fail to acknowledge you should not participate in the breach of normal government I must appeal to your reason to vote against the mandate. Further, I ask you to ask the legislature to amend the procedure, increasing the petition size to something much larger, 10,000, 100,000, something consistent with getting something on a ballot.

My arguments:

What can Maine do about climate change? Maine is a ridiculously small cog in this wheel.^[2]

The mandate expects to reduce CO2 emissions by 2 million metric tons in the year 2040. Does that include the fact that the national grid will only be 60%^[3] green in 2050? Is the real contribution then 60% of 2 million, 1.2 million?^[4]

The US CO2 footprint is 6.4 Billion metric tons. Maine's 2 Million reduction is a tiny percentage, 0.3%, its only possible value being virtue signaling.

If Maine's virtue signaling and that of another 11 states convinces all 50 states to mandate EVs, 1 billion metric tons might be removeable, (1.028 billion from all gasoline).

Only if the electric grid is 100% green. The federal energy department predicts that in 2050, 26 years from now, the grid will be only 60% green. The real reduction then is really 60%, 600 million metric tons, which is only 10% of the whole US problem, 0.16% of the world problem.

Therefore this EV mandate at both the state and federal levels is decades premature and really, ridiculously ineffective because the world is producing 36.8 billion metric tons of CO2.

The real gains must come from elsewhere:^[5]

- Steel, concrete, plastic, 31%, 11.4 Billion metric tons.
- Electricity, 9.9 Billion
- Growing things, plants, animals, 7 Billion
- All transportation, 5.9 Billion, of which passenger autos worldwide are less than half, less than 3 Billion. Note the potential for Maine to contribute a mere 2 million, 0.05%
- Heating, cooling, refrigeration, 2.5 Billion.

What does this mandate do FOR the people of Maine? What is gained, what is the cost? Stalled EV sales might be temporary; The charging grid will improve; initial costs might even come down. Maybe all the inconveniences become tolerable.

But wait a minute; while manufacturers are losing billions, about \$76,000 per electric vehicle reported by Ford recently and while government is subsidizing the charging grid, providing tax incentives, charging stations, etc., to the tune of \$48,000 per vehicle, the BEP cannot simply claim that it is less expensive to own an EV than ICE vehicles. This is phantasmagorical.^[6] There is an extremely high cost to consumers because the federal government is dumping billions into our debt, already \$34 Trillion in arrears. When these facts are considered there is no way anyone can claim EVs cost less.

The wealthy have bought EVs for use in a national grid 37% green, surely just to experiment and virtue signal. The remaining drivers are not impressed with purchase costs, uncertainties and loss of convenience.

Did you note recently that Hertz is selling their EV fleet due to excessive costs?

Did you also note the federal government just dropped some ridiculous multiplier they were using to predict efficiency?

What does this mandate do TO the people of the state of Maine?

Transition. One technology to another, never perfect, not without hiccups, problems, inconveniences. It is not a small transition. Given the benefits, debatable, meager, is it worth it?

The entire country's governing bodies are turning an entire industry into a government run experiment, turning an auto industry completely upside down for meager gains, causing significant upheaval across the world. And stifling advances in alternative technologies.

The quest for EVs is pushing all the limits around the world for mining for copper, aluminum, rare earths for batteries. Particularly disturbing, in less developed countries such as the Congo, where there is no OSHA, children are working the mines. It is irresponsible for the western world to purchase materials collected from these circumstances.

Further, large portions of multiple countries in Africa are being exploited for mining. Human rights abuses, confiscation of villages, private property, deforestation of supreme habitats, all too commonplace. And we are guilty. For what?

Life cycle analysis of EVs vs ICE will begin to include unforeseen exigencies and I doubt the new examinations will favor EVs. At a minimum, one has to wonder, does this mandate really do anything meaningful? Right now? With so much uncertainty about the whole chaotic program?

The gains for the people of Maine are very, very meager in terms of CO2 reduction while at the personal level the dollar savings are also meager if actual. And the national debt is absorbing enormous hidden costs.

My final two questions for all of you:

1. How can you justify the mandate when in the end the mandate is so disruptive and the gains are questionable, meager at best?
2. How can you possibly vote for the mandate when the process completely usurps government of the people, by the people, for the people?

Thank you for reading.

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^[1] Tim Plouff, in a letter to the BEP, January 13, 2024, with highlights by me.

^[2] We are 1.3 million people with about a million passenger vehicles in a country of 332 million people with 265 million vehicles on a planet with 7.9 billion people and 1 billion passenger vehicles.

^[3] Federal department of energy.

^[4] From the BEP, Maine's grid is 67% green. From the US Energy department, today the national grid is 37% green, 17% renewables, 20% nuclear.

^[5] From Bill Gates book, [How to Avoid a Climate Disaster](#).

^[6] I first learned of the word phantasmagorical in high school 60 years ago and have never used it since. Studying the EV advocacy and this mandate, the word magically popped into my head and I had to look it up to make sure it was real. Now you have it too, **having a fantastic or deceptive appearance**, as something in a dream or created by the imagination.

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On Mon, Jan 8, 2024 at 9:58 AM Cayting, Lynne A <Lynne.A.Cayting@maine.gov> wrote:

<https://www.maine.gov/dep/bep/2023/12-21-23/Chapter%20127-A%20Basis%20Statement%20and%20RTC%20FINAL-Corrected2.pdf>

Mr. Jones,

Attached is the Board agenda with links to all the documents for the draft Advanced Clean Cars rule. The link above is for the Response to Comments document.

Let me know if you have any questions, Lynne

Lynne Cayting, Chief

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