

Townsend, Erle

From: Nicole Desjardins <nicole.desjardins.00595@advocacy.online>
Sent: Wednesday, January 31, 2024 8:23 AM
To: DEP Rule Comments
Subject: OPPOSE - Chapter 127-A: Advanced Clean Cars II Program (Reposting)

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Lynne Cayting,

Proposed Rule 127-A, which mandates that beginning with the model 2028 year, 51% of vehicles sold must be electric, is incredibly costly to both customers and dealerships.

Customers face a higher vehicle cost, additional expenses for charging infrastructure at their home, high financing rates, and unknown electricity bills.

The costs that dealerships will pay in interest to a financing source for the unsold inventory is not their only significant burden. Dealerships will have to continue to invest significant resources to handle electric vehicles. While these investments are already happening, there are still significant challenges to overcome.

Some of the dealership challenges associated with expanding the sale of electric vehicles include bringing 3-phase power to the location; nation-wide shortages of utility transformers and switching boxes; upgrading and replacing dealership internal electrical setup; higher utility costs to maintain new systems; and costs associated with purchasing and installing vehicle chargers. In addition, Maine's electric grid and charging station infrastructure is woefully inadequate and cannot handle the increased demand.

In the last two months alone, Mainers have experienced widespread power outages as a result of severe weather. People were without power for days. Now is not the time to impose mandates that limit consumer choice, and force dealerships to stock vehicles that are not only impractical for many customers, but also undesired by the consumer.

It is likely that dealerships will not only have increasing costs, but also declining sales. Mainers will simply buy the vehicle of their choice across state lines in places like New Hampshire which do not have these mandates. They may even decide to keep their current vehicle or trade it for another used vehicle, thus negating any of the climate goals these rules seek to achieve.

I am concerned with Maine considering to enact mandates that limit people's choices in vehicle selection. I work for a reputable dealership and hear the rumblings from customers who don't want to be dictated to on what they will purchase or what options are available to them. During the pandemic, the dealership world already felt the pinch with what options were available for new. The pandemic and the challenges with it were all out of our control, but these mandates are within our control and I urge you to vote no on both mandates. My other concern is that just because that might work in California; Maine is all together a different climate and State. EV's and electric vehicles do not like the cold weather and do not perform as well in the winter months as in the summer months. I have owned a hybrid so I know this from personal experience. I can appreciate diversifying the different types of vehicles, but mandating is altogether different. I would also like to share my thoughts on the pure expense of replacement of an EV or electric battery. I got rid of my hybrid due to my concern over battery replacement outside of warranty. I would have been looking at a cost of \$5 to 8 thousand dollars for a 10 year old car that isn't valued at that for a battery replacement. I am concerned that Maine does not have the infrastructure to support the mandates for electric vehicles at this time. I have only shared a few concerns from a consumer/taxpayer perspective and have not expressed my feelings as an employee of a dealership.

My views as a team member working for a successful dealership: I am concerned with limiting people's options. As a Human Resource Manager, I can share that Maine already has a shortage of mechanics to work on vehicles now. With all the new technology and electric parts of these vehicles, less students are interested in learning about electricity and more about working on vehicles. A Mechanic needs to be highly trained and skilled and have proper equipment to actually work on these electric vehicles and special tools. If Maine enacts these mandates, I am concerned that Maine may not have the skilled workforce to fix or work on any of these vehicles. I am truly concerned that these mandates will hinder Maine and push us further behind the states we currently compete with. A small shop of mechanics will not be able to stay open if we take most gas vehicles off the road and many dealerships will close as well.

Living in Maine and understanding the climate here, makes these mandates unreasonable and certainly unattainable. I certainly urge you to oppose electric vehicle sales mandates for the reasons above.

For these reasons, please oppose this proposed rule.

Sincerely,

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