

Townsend, Erle

From: Stephen Shuman <stephen.shuman.099a2@advocacy.online>
Sent: Monday, January 22, 2024 3:15 PM
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.

For these reasons, please oppose this proposed rule.

Sincerely,

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