

## Breton, Mary B

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**From:** dwspacek@snet.net  
**Sent:** Tuesday, August 15, 2023 4:45 PM  
**To:** DEP Rule Comments  
**Subject:** Comment on Chapter 127-A: Advanced Clean Cars II Program

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Comment on Chapter 127-A: Advanced Clean Cars II Program  
<https://www.maine.gov/dep/rules/index.html#11458245>

In the Fact Sheet, why is this rule designated as “Routine Technical” instead of “Major Substantive”? A State of Maine rule that says that the entire population of the State cannot purchase a gasoline powered car and can only purchase a much more expensive electric car should be regarded as a major, substantial rule, in my opinion.

Maine is the worst state in the lower 48 states to operate an electric car because of the slower charging time because of the colder climate.

“Electric Vehicles vs. Maine Winters: Will EVs struggle with Maine’s frigid cold?”

<https://www.themainewire.com/2023/08/electric-vehicles-vs-maine-winters-will-evs-struggle-with-maines-frigid-cold/>

“Empirical analysis of electric vehicle fast charging under cold temperatures”

<https://www.sciencedirect.com/science/article/abs/pii/S0301421518304828>

“Winter & Cold Weather EV Range Loss in 7,000 Cars”

<https://www.recurrentauto.com/research/winter-ev-range-loss>

The fact sheet states: “For the consumer, ZEV buyers are likely to realize as much as \$7,900[2] in maintenance and operational savings over the first 10 years of ownership.”

<https://www.maine.gov/dep/rules/index.html#11458245>

The \$7,900 amount comes from reference number [2]:

<https://ww2.arb.ca.gov/news/california-moves-accelerate-100-new-zero-emission-vehicle-sales-2035>

There is no analysis in this reference [2] on how the figure \$7,900 was derived, it is simply stated. This figure may not apply to the State of Maine with its colder climate compared to California.

The reference [2] shows that the California state government will provide financial assistance to its population to switch to electric vehicles. There is no proposal in the rule for financial assistance by the State of Maine to help people with the higher cost of buying an electric vehicle.

“Increasing Access to Zero-Emission Vehicles for all Californians

Governor Newsom proposed, and the Legislature has approved, \$2.7 billion in fiscal year 2022-23, and \$3.9 billion over three years, for investment in ZEV adoption, as well as clean mobility options for California’s most environmentally and economically burdened communities. These programs support the new regulation by increasing access to ZEVs for all Californians, including moderate- and low-income consumers. They include:

Clean Cars 4 All provides up to \$9,500 to low-income drivers who scrap their older vehicles and want to purchase something that runs cleaner.

The Clean Vehicle Rebate Project (CVRP) provides up to \$7,000 for income-qualified drivers to buy or lease a ZEV.

The Clean Vehicle Assistance Program provides low-income car buyers with special financing and up to \$5,000 in down-payment assistance.

The Governor’s ZEV budget includes \$400 million over three years for the statewide expansion of Clean Cars 4 All and for a suite of clean transportation equity projects. The budget also includes \$525 million for the Clean Vehicles Rebate Project (CVRP). In addition, there is \$300 million for more charging infrastructure, especially for those consumers who may not have a garage where they can charge their EV. “

“Electricity bills are surging, is it still cheaper to charge an EV than get gas? It depends.”

<https://www.usatoday.com/story/money/cars/2023/02/16/cars-gas-ev-fuel-electricity-rates/11267270002/>

Best Regards,  
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