



Monday, August 28, 2023

Maine Board of Environmental Protection  
Lynne Cayting  
17 State House Station  
Augusta, ME 04333-0017

RE: Chapter 128 - Advanced Clean Trucks Program

Ms. Cayting,

Thank you for the opportunity to comment on the pending Chapter 128 routine technical rule changes regarding the Advanced Clean Trucks Program. We appreciate the opportunity to offer comments and hope that it is helpful during the board's deliberations.

ABC Maine understands and appreciates the spirit in which the citizens initiated rule changes have been presented to the board. As Mainers we all value our environment and want to preserve it for future generations. We are aware that ZEV's have a place in the marketplace and are a segment of the transportation sector that is growing year over year. We have been encouraged and fascinated by the advances in fuel cell and battery operated vehicles and even heavy equipment that is not the subject of this rule. However we feel the proposed rule changes, specifically in regards to the ACT will present incredible financial, logistical, and supply difficulties for our members.

While we understand that the presented rules are not intended to force businesses to purchase ZEV's for their fleets, they are designed to place pressure on the manufacturers of the vehicles that our members use every day. HD pickup trucks and vehicles with a GVWR of 8500 pounds or more are essential to the operations of virtually all of our members. While technology is certainly advancing for HD ZEV's to be feasible they certainly have a long way to go.

Even though HD vehicle manufacturers are moving as fast as they possibly can to electrify their offerings there are still very few options for consumers. California has

been leading the nation and the world in ZEV standards. The California Energy Commission tracks the registration and use of those vehicles. In 2022 there were 2,302 HD ZEVs in use in California. Most of those vehicles were buses for school and city transport which have been heavily subsidized by the State of California and the federal government. In contrast only 340 were delivery vans and 272 were trucks.<sup>1</sup> Traditional ICE HD truck manufacturers like Volvo, Mack, and others have EV options, but they range in cost from \$350,000 - \$600,000 for one vehicle.<sup>2</sup> The only manufacturer of HD ZEVs that even comes close in cost for a semi is Tesla at a promised price of \$180,000 per unit; and it is not yet commercially available.

When you go down in size there is much more immediate promise for pickup trucks. Traditional manufacturers like Ford, General Motors, and Toyota have options that are already available or are very close to entering the market. For example the Ford F-150 Lightning would qualify as a HD ZEV. The GVWR clocks in at 8,500 pounds. However, according to their public testimony to the CARB board in California even those manufacturers have said the ACT regulations are too stringent and should not begin until 2030 at the earliest.<sup>3</sup> The capability just is not there.

ABC Maine also has serious concerns about the infrastructure to charge these vehicles. While it is true when fully charged the range on these vehicles can vary from 250 - 550 miles. Those numbers are based on typical capacity. However, they do not account for cold weather. EVs can lose anywhere from 10 - 36% of their range in cold weather. It also takes substantially longer to charge a vehicle when it's cold.<sup>4</sup> In Maine, that is something to consider.

We also ask the board to consider the current available supply of charging stations around the state. While the Governor has prioritized the deployment of new charging stations in her *Maine Won't Wait* climate action report there is still a far way to go. We believe that while charging infrastructure is coming, it is not sufficient yet to fuel our transportation needs. We believe charging infrastructure should be widely available before we encourage wide scale adoption of HD ZEVs.

There are also significant concerns around the cost to charge these vehicles. Maine electricity consumers are currently paying 81% more than the national average for

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<sup>1</sup> <https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/medium-and-heavy>

<sup>2</sup> <https://www.nextbigfuture.com/2022/12/shopping-guide-for-electric-semi-trucks-prices-weights-and-payload.html>

<sup>3</sup> <https://www.arb.ca.gov/lists/com-attach/153-act2019-BW0FYIY7WGcAKFMj.pdf>

<sup>4</sup> <https://apnews.com/article/electric-vehicles-cold-weather-battery-ev-6d86b7aa19e233d5dcc4d2c9abb193ed>

electricity.<sup>5</sup> It is no secret that Maine has an energy supply crisis and until we collectively figure out how to supply more energy at a cheaper rate we should cautiously consider policy decisions that would test the limits of our supply.

By forcing manufacturers to reduce to elimination the production of ICE units consumers will be left with few options. Either purchase an exorbitantly priced new electric HD truck or continue to repair their aging fleets. Hardly a choice that our members would like to make.

Our members have been at the forefront of advocating for equal worker access to state sponsored and independent clean energy projects. We believe there are technologies that can be deployed to decrease our reliance on fossil fuels all the while responsibly using technologies that have built America. ABC Maine does not believe that adopting these proposed rules will benefit the construction sector in any way. We believe that it will increase the cost of doing business overall and will lead to consumers paying more for their final product.

Once again, thank you for the opportunity to submit comments on these proposed rule changes. We welcome the opportunity to provide further information should it be required.

Sincerely

*Hope Pollard, President*

Hope Pollard  
President  
Associated Builders and Contractors of Maine

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<sup>5</sup> [https://www.energybot.com/electricity-rates/maine/#:~:text=Last%20updated%20August%202023&text=The%20average%20Maine%20residential%20electricity,higher%20than%20the%20national%20average\).](https://www.energybot.com/electricity-rates/maine/#:~:text=Last%20updated%20August%202023&text=The%20average%20Maine%20residential%20electricity,higher%20than%20the%20national%20average).)