

From: [Gene Masteller](#)
To: [DEP Rule Comments](#)
Subject: Comment on Chapter 128: Advanced Clean Trucks Program
Date: Wednesday, August 23, 2023 8:59:26 AM
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To Whom it May Concern.

There is a time and place for everything. Unfortunately, this is not the time to adopt electrification for the state of Maine.

Atlantic Great Dane is a leading provider of Great Dane trailers throughout the country and we have seen firsthand the failures of the premature implementation of electrified technology in California. Many of our customers are working to achieve the rigid requirements for zero emission equipment and are becoming very frustrated in their efforts as they look at equipment sitting due to a lack of infrastructure to support the initiative. Meanwhile, other locations are being threatened with brown outs due to the large consumption of electricity required to charge these batteries. Charging a single truck consumes enough electricity to power 75 homes per day. Many of the operations I work with plan to have 20-30 trucks per location. This will result in an even greater demand on the already underperforming infrastructure of California. This additional demand will result in more production requirements from fossil fueled energy plants.

How can the Maine carriers afford an electric truck that cost \$200,000 more than a diesel fueled truck before subsidies? Currently California's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) tops out at \$120,000 for Class 8 electric trucks, with higher dollars available for fuel cell trucks. Maine would have to create a similar program to help offset the high cost of electric trucks to make them affordable to the fleets in the state. Where will this money come from? The consumer will ultimately pay the price.

This brings me to another point. Battery technology changes every day, but it has not fully evolved to a point where acceptable range can be achieved. Carriers are being forced to adopt shorter routes due to the limitations of the battery capacity on the vehicles. Lithium Ion batteries are expensive and very heavy. California has adopted a 2,000lb overweight allowance for vehicles that are electrified to help offset some of the added battery weight. However, we need to bear in mind the additional toll this will take on our already troubled highway system in Maine. Then, how do we manage the disposal of the hazardous lithium ion batteries at end of life? I'm certain that the environmentalist will not be very supportive of creating a battery dump site that could potentially leach into our water aquifers, rendering our drinking water toxic.

Maine winters are harsh. We riddle our roads with corrosive de-icing agents to prevent freezing on the roads in our cold climate. The winters will take a couple of major tolls on the electric truck. First, they utilize a lot more electronics for monitoring battery condition and running the drive line. This requires additional wiring that will likely be impacted by the calcium chloride that we treat our roads with in the winter. This combination could render the vehicles useless and could require extensive hours of troubleshooting to get them up and running again. Lastly, the shorter routes mentioned above will become even shorter because the battery state of charge (SOC) is greatly reduced in colder climates. This could result in stranded drivers on the highways or in Maine's woods where

they could potentially stranded without heat during a harsh winter storm.

As I mentioned in my opening statement, the technology and infrastructure is not there for a smooth and safe transition to electric class 8 trucks to work in Maine.

Respectfully,

S. Gene Masteller

President



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****Please note my direct line has been added****