

## Breton, Mary B

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**From:** Blake McElman <blake.mcelman.86864@advocacy.online>  
**Sent:** Friday, August 25, 2023 9:37 AM  
**To:** DEP Rule Comments  
**Subject:** Please Oppose Proposed Rule 128 - Electric Vehicle Sales Mandates on Trucks

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Lynne Cayting,

I am writing to you today to urge you to oppose the proposed rule to mandate the sale of medium and heavy-duty electric trucks in Maine. I support voluntary choice by our customers of vehicles that meet their needs. This plan is costly, unrealistic, and requires dealers to abandon our longstanding principle of finding vehicles that best suit the needs of our customers.

This plan is burdensome and costly to dealers. The California rules define “sale” in such a way as to mean the transaction between the manufacturer and the dealership, not the purchase by an ultimate user. Any penalties assessed would fall on the manufacturers. In an effort to avoid penalties, manufacturers will act to ensure a sufficient mix of EVs and ICEs are on dealership lots. This means dealerships will have vehicles in stock to meet manufacturer obligations, not necessarily the vehicles customers want or need. Dealerships will be left with unsold inventory for which they are paying interest to a financing source, which is not only burdensome but incredibly costly.

Proposed Rule 128 limits customer choice, requires purchase of vehicles which can cost 2-3 times the price of current comparable vehicles, have significantly lower range of operation between refueling & recharging, need charging station infrastructure different from light-duty vehicles (this infrastructure is currently not available in Maine), and does not address the woefully inadequate electric grid.

Dealerships work to help customers purchase the vehicle that best suits their needs, and we oppose efforts that reduce that choice and burden hardworking Mainers.

Again, please oppose the proposed Rule 128 electric vehicle sales mandates on medium and heavy-duty trucks.

1. Rule 127-A and Rule 128: mandate will likely be unachievable and a disaster for the local environment, economy, dealer profitability, and consumer satisfaction.
2. This mandate is egregious and impulsive, it lacks forethought and won't help the common good by 2026. Maine lacks the most necessary assets to sustain the mandate. The proposed EV percentage is lofty. I recommend a 10-20% EV/Hybrid mandate by 2026. This process must be incremental. If pushed too fast, it will fail.
3. The market and economy in Maine do not support the proposed EV capacity for many reasons. As of now, the Maine market is saturated with the current EV availability and dealers are struggling to sell them including us. Tesla currently has the most market share in the US. With all other manufacturers trying to reach 43% EV penetration by 2026 will result in a disaster for dealers and manufacturers. The demand and infrastructure are not going to be adequate by 2026.
4. Whether they are affordable or not, consumers in rural and urban areas will be hesitant to purchase an EV. This is due to charge times, range,

charging station constraints, suggested climate-controlled storage, charging costs, and battery issues in the winter.

5. Manufacturers are struggling to produce an affordable, profitable, and reliable EV. Their goal is to produce an EV with a 300+ mile range, fast charging, reliable powertrain, and a price of \$25,000-\$35,000. Range, charge times, and reliability are forecasted to be attainable by 2026 however the consumer cost may not be and is projected to be between \$45,000- \$60,000 for compact cars and SUVs and much more for Trucks.

6. By 2026 the power grid in Maine may not be able to sustain additional EV charging stations. With an increase of roughly 25,000 additional EV owners charging their vehicles from their homes using 220 volts systems for 6-12 hours every night.

7. Dealer costs that are absorbed from the manufactures to sell and service EVs were close to \$100k in 2023 and we sold two cars totaling \$6,000 in profit which was a net loss of roughly \$94k. The proposed dealer costs in 2026 are estimated at \$200-300k which is an investment that dealers cannot absorb in one year.

8. While EVs provide numerous environmental benefits over ICEs, particularly with their zero tailpipe emissions, both of these vehicle types still harm our planet in different ways. I firmly believe EVs are a beneficial solution to ICE's with the proper mandates and policies in place. EVs aren't a solution unless the life cycle of the vehicle is supported exclusively with renewable energy. By 2026 it won't be and the carbon footprint between EVs and ICE's are very similar. The environmental gain isn't possible, the average costs are higher for consumers and the infrastructure isn't in place. It is a horrible solution to try to reach by 2026 and will fail. Please continue to support renewable energy production of vehicles in the US but drop the mandate to 10-20% Hybrid/EVs by 2026.

Respectfully,

Blake McElman  
GM  
Bath Subaru

Sincerely,

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