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From: CHARLES COLWELL <charles.colwell.6bfd8@advocacy.online>
Sent: Monday, August 28, 2023 9:46 AM
To: DEP Rule Comments
Subject: Please Oppose Proposed Rule 127-A and Rule 128 Electric Vehicles Sales Mandates on Vehicles

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Lynne Cayting,

I am writing to you today to urge you to oppose the proposed rules to mandate the sale of electric vehicles in Maine. This plan requires that beginning with the 2027 model year, 43% of vehicles sold must be electric vehicles. 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.

Dealerships have and will continue to invest significant resources to handle electric vehicles. However, challenges still exist. Some of the challenges include bringing 3-phase power to the location; nation-wide shortages of utility transformers and switching boxes; upgrading and replacing dealership internal electrical setup; ongoing higher utility costs to maintain new systems; and costs associated with purchasing and installing electric vehicle chargers. In addition, Maine’s electric grid and charging station infrastructure is not, and will not be, sufficient to handle the increased demand.

This rules not only burdens dealers, but it severely restricts and potentially eliminates consumer choice. Customers will no longer be able to select vehicles based on their wants and needs. Maine customers will simply purchase vehicles in other states like New Hampshire, who do not have these mandates. Maine does not have registration denial, so Mainers can buy vehicles out-of-state and then register them to drive in Maine even though dealers cannot sell the vehicles they bought. Maine customers may also just decide to keep their current vehicle or trade for another used vehicle which negates the climate goals this proposed rule seeks to achieve.

On the medium and heavy-duty side (vehicles over 8500 GVW), mandatory levels of electric vehicle sales would vary, depending on Class of vehicle, between 15 and 20% for model year 2026. Manufacturers of some of these vehicles do not currently have plans to electrify some Classes. Imposition of Rule 128 would increase costs that would ultimately be passed on to the consumer and result in sever dislocations in the distribution of goods and services in Maine.

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 127-A and Rule 128 electric vehicle sales mandates on vehicles.

Sincerely,

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