

August 28, 2023

Ms. Lynne Cayting
Maine Bureau of Environmental Protection
17 State House Station
Augusta, ME 04333

RE: Comments on Adoption of California's Advanced Clean Trucks Rule (ACT)

Dear Ms. Cayting:

I am writing on behalf of HospitalityMaine to express our concern of the adoption of Chapter 128, Advanced Clean Trucks Program. We are supportive of sensible clean energy initiatives and see the value in the potential benefits of electric vehicles (EVs) in reducing emissions and promoting sustainability. However, as we consider the adoption of California's Advanced Clean Trucks Rule in Maine, it is crucial to acknowledge that while we share the goal of a greener future, Maine is not California, and there are likely to be many unintended consequences associated with this transition. In this testimony, we would like to address three primary concerns:

1. Maine's Charging Infrastructure Is Not Prepared for Zero Emission Vehicles (ZEVs):

While the concept of transitioning to zero-emission vehicles is commendable, Maine's current charging infrastructure is not adequately prepared for the widespread adoption of EVs. Unlike California, where charging stations are more prevalent, Maine's rural nature presents unique challenges in terms of accessibility to charging stations. This infrastructure gap could hinder the adoption of EVs, especially in regions where charging infrastructure is sparse. The need for substantial investments in charging infrastructure should not be underestimated, and a comprehensive plan is necessary to ensure equitable access to charging facilities throughout the state.

2. Concerns About Reliability in Maine's Cold Weather Climate:

Maine's cold weather climate presents unique challenges for electrification technology. Batteries in EVs tend to be less efficient in extreme cold temperatures, which can lead to reduced range and potential operational issues. This is a genuine concern, especially in rural areas where long distances between charging stations are common. To fully embrace electrification, we must address these cold weather challenges and invest in technologies that can perform reliably in our climate.

3. The Electric Grid System's Capacity to Handle Increased Demand:

A significant shift towards EVs mandated by the Advanced Clean Trucks Rule could place a substantial demand on Maine's electric grid system. It is crucial to consider whether our existing grid infrastructure is equipped to handle this increased load. This challenge extends beyond the charging infrastructure and

includes the entire electrical grid's capacity to provide consistent and reliable power. Addressing this issue would necessitate significant investments in grid upgrades and modernization to ensure that the transition to EVs does not compromise the reliability of our electricity supply.

A comprehensive study of our transmission and distribution grid system should be conducted to evaluate its readiness for this mandated transition. This study would provide valuable insights into the necessary infrastructure upgrades, potential reliability challenges, and overall feasibility of the transition to electric trucks in Maine. It would seem more appropriate for a policy change this substantial to go through the regular legislative process that includes the input of Maine's legislators. This will allow for input from a diverse range of stakeholders and promote a well-informed decision-making process.

Thank you for considering our concerns and suggestions as you deliberate on the adoption of California's Advanced Clean Trucks Rule. Please let me know if you have any questions.

Sincerely,

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