

## Breton, Mary B

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**From:** John Waisanen <JWaisanen@firstfleetinc.com>  
**Sent:** Wednesday, August 23, 2023 10:10 AM  
**To:** DEP Rule Comments  
**Subject:** Comment on Chapter 128: Advanced Clean Trucks Program

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I oppose Chapter 128. We do not have the infrastructure to go to electric tractor trailers at this time. There is a limited supply of electric trucks and they have a range of 150 miles. The charging time is listed as 3 hours. That would cut driver productivity 40%. We already have a shortage of driver, this would add to it. In order to keep drivers they would need to be paid the time it takes to charge the truck, this would be passed on to the consumer driving up the cost of goods in the state of Maine. Based on what I have read the weight of the batteries will reduce the maximum cargo weight by 20%. The cost to the carrier will be enormous. For example we run a load 5 days per week from Lewiston to Houlton/Presque Isle. He would need to stop in Howland to charge the truck for 3 hours. He could then deliver Houlton and Presque Isle. He would then need to stop in Mars Hill to charge the truck for 3 hours and stop for 10 hours due to being out of time. Then he would need to stop in Bangor for 3 hours to charge the truck. He could then make it back to Lewiston. 27 hours and 02 minutes from the time he started. We currently run this in 12 hours and 45 minutes. This is provided we have the charging stations in the proper places and they are available. When the driver stops for his 10 hour break they will be blocking the charging station for the full 10 hours. Once they stop it is against DOT regulations to move the truck. Please feel free to contact me if you have any questions. Thank you for your time.

John H. Waisanen II  
Zone Manager  
FirstFleet Inc.  
61 Twin Road  
Auburn, ME  
Cell: (207) 240-8004  
Fax: (800) 201-0240