

Breton, Mary B

From: Larry Dreher <ljdreher@icloud.com>
Sent: Friday, August 18, 2023 1:38 PM
To: DEP Rule Comments
Subject: Comment on Chapter 128: Advanced Clean Trucks Program

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Hello,

I would like to express concerns about the coming rules regarding a transition to electric vehicles under 8500 GVWR.

I frequently have to travel out of state for long road trips related to managing my family's affairs. My trip is typically about 370 miles long and takes about 7-1/2 hours with a rest for about 15 minutes. I can leave first thing in the morning, and get to my destination by dinner, depending on traffic. At my destination, a 55 plus apartment complex, has no charging stations for any of its several hundred residents and is not close to a service station.

In the scenario described above, with current battery technology and vehicle range, this trip would take multiple "fast" charges (assuming that charging stations available with no vehicle waiting on 95/90/295/495/290) to make this destination, and then a full charge at the destination (no stations, as discussed above). This issue will turn a trip that is normally less than 8 hours into a 12 plus hour trip and possibly overnight.

Making the trip in winter will further reduce the range and increase trip time. A longer day on the road also may increase driver fatigue or require drivers to rest, similar to the trucking industry.

Until battery technology provides similar ranges and fill up /charging times to petrol powered vehicles, you will be doing long range drivers a disservice in and out of Maine. I believe this bill is premature until technology catches up.

Furthermore, I'd suggest that your transportation engineers calculate, using current vehicle traffic counts, the mileage/charge needs of the vehicles and perform a realistic calculation of charging stations required and capacity of the current electric grid to support this surge in power line/substation infrastructure for normal and summer traffic loads. I did not see that as a pretext for adapting the California standard.

(As a note, I am a snow bird and tow my RV down south or to the mid west. Fortunately my light truck GVWR exceeds your limit for this bill. Today, a fully outfitted F150 lightning, towing at capacity, has a range of about 80 miles. I would not make it out of the state of Maine the first day before having to charge my tow vehicle. Charging stations do not accommodate towing a camper; tying up a charger for several hours for a full charge, or stopping every 50 miles for a fast charge will limit daily mileage to the point of being infeasible to tow out of state. Also, it will become infeasible for tourists to likewise head to Maine during vacation season with their electric RV rigs)

Regards,

Larry Dreher

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