



MAINE BEVERAGE ASSOCIATION

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Lynne Cayting, Chief
Mobile Sources Section in the Bureau of Air Quality
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333

To the Members of the Board of Environmental Protection:

My name is Newell Augur. I am a resident of Yarmouth and a partner with Pierce Atwood. I represent the members of the Maine Beverage Association, your local distributors of soda, diet soda, water, juices and sports drinks, among other refreshing products. Our members include Blue Triton/Poland Spring, Capt'n Eli's Soda, Coke Northeast, Polar Beverages and Pepsi Beverages Maine. Collectively, we are responsible for over 1,500 direct employees in Maine - good paying jobs with excellent benefits – and indirectly responsible for tens of thousands more. I appreciate the opportunity to provide comments regarding Chapter 128, the petition to adopt the California standards for medium and heavy-duty electrified trucks in Maine.

Our members and their national partners have each set ambitious system-wide sustainability goals that cover source reduction, packaging innovation, designing products for recyclability and using more recycled content in packaging and reducing the carbon footprint of overall operations. Transitioning our heavy-duty truck fleets to a more sustainable model is part of that effort. In December 2022, PepsiCo took delivery of the first all-electric Tesla semi-trucks in production. The trucks are part of a larger order to be deployed across PepsiCo's snacks and beverage businesses to evaluate how best to leverage electric vehicles and technologies moving forward. BlueTriton/Poland Spring operates a fleet of home and office delivery trucks under the name ReadyRefresh and to date has converted nearly two-thirds of those delivery trucks from diesel to alternative fuel technology. They also are implementing a robust last-mile delivery solution to make delivery routes more efficient and maintain ReadyRefresh's carbon neutral certification. Coca-Cola and its bottling partners are investing in more fuel-efficient and low carbon vehicles. Keurig Dr. Pepper has committed to significant reductions in both its own and all its subcontractors' total emissions by 2030.

Decarbonizing our fleet operations is not limited to a transition to zero-emission vehicles. Our members are also working to improve the efficiency of our vehicles, routing, and driving, using cleaner fuels on those routes, and sharing best practices with third-party partners to encourage them to do the same. But the conversion to zero-emission vehicles cannot be done overnight. It will require thoughtful and significant investment at all levels of our national infrastructure for the successful introduction - much less transition - to medium and heavy-duty electric vehicles trucks to be accomplished. As we embark on that process, we must be mindful not to let our enthusiasm outpace what science will allow.

There are many challenges yet to be addressed; most of them relate to the battery, both in terms of its weight and its performance. Batteries for medium and heavy-duty electrified trucks are very heavy. That increase will have an impact on maximum weight limits on highways and bridges, which will in turn affect load efficiencies. Under current circumstances, the terms of Chapter 128 likely would increase the amount of time that trucks are on highways in Maine delivering our products.

The performance concerns of an EV battery are also significant. We keep current route trucks an average of 15 years. We do not yet know the effects battery degradation will have on a truck's range over that period. Maine is a rural state, and our drivers travel significant distances over varying terrain each day to service customers. Trucks perform differently at different terrain grades so the need for additional horsepower to climb the foothills in Western Maine and the subsequent reduction on a truck's range presents a logistical challenge.

Based on our experience using EV trucks in other states, the battery range for a heavy-duty truck carrying our products under normal conditions is not much more than 150 miles on a full charge. Battery performance during Maine winters will reduce that range further. With these limitations, very few of our delivery routes in Maine can be completed without recharging the battery for an extended time during the workday.

Commercial truck battery charging infrastructure is not available throughout the state. It would be risky, therefore, to require that a percentage of trucks operating in Maine be converted to EV before that infrastructure is in place. In addition, an EV truck costs more than three times as much as a similar diesel model, and there will be costs to install battery charging infrastructure at facilities to charge multiple trucks at the same time.

None of this is to suggest that the members of our association are not already working to transition to a more sustainable truck fleet that makes use of alternative fuels. But the science needs to catch up to our anticipated hopes for a more electrified trucking fleet before Chapter 128 can be implemented. And Maine needs to make far greater investment in infrastructure to make that transition effective.

Thank you for your consideration of these comments.



Newell Augur
Executive Director