

TESTIMONY of Charlie Summers

President & CEO  
Maine Energy Marketers Association

**BEFORE THE MAINE BOARD OF ENVIRONMENTAL PROTECTION**

**In Opposition to Proposed Rulemaking Regarding Chapter 128, Advanced Clean Trucks Program.**

Chairwoman Lessard, and members of the Board of Environmental Protection, my name is Charlie Summers, I am the President and CEO of the Maine Energy Marketers Association (MEMA).

I am here today, on behalf of the Maine Energy Marketers Association (MEMA), to submit testimony in opposition to the proposed rulemaking relating to Chapter 128, Advanced Clean Trucks Program.

MEMA is a trade association composed of approximately 300-member companies and over 5,000 direct and 5,000 indirect people working in energy delivery and servicing businesses delivering heating oil, biofuels, motor fuels, propane, pellets, and kerosene and offering service and installations on the equipment that operates these fuels. MEMA also provides heating, ventilation, air conditioning, and refrigeration (HVAC-R), education and training to hundreds of Mainers each year at our Technical Education Center (MTEC) located in Brunswick.

While the California Advanced Clean Trucks regulation might sound good, the portions of this effort contained in Chapter 128, Advanced Clean Trucks Program are not good for Maine. As you begin your deliberations on this matter, I ask that you consider the following from a recent study on Zero Emission Trucks (ZET) conducted by the American Transportation Research Institute (ATRI):

- Cost will be a significant barrier – a new Class 8 diesel truck tractor costs between \$135k-\$150k. A new Class 8 BEV costs upwards of \$450k
- Refueling Infrastructure – there is currently no Maine, or U.S., “network where over-the-road trucks can stop for rest breaks and recharging at the same time.”
- Battery Life. Battery degradation is “greatly influenced by the number of charge cycles” which in Maine would be significant.
- Battery capacity or charge rates, Battery Electric Vehicle (BEV) charging will be limited by state and federal Hours-of-Service rules for drivers.
- Electricity Needs are significant and more than 60% of electricity currently available in Maine will be needed to meet vehicle travel needs under full electrification of all vehicles.
- Battery size and weight. The size and weight of the batteries that will be required to for heavy duty trucks not only will increase the price of the trucks but will decrease the amount of cargo able to be carried – meaning more BEV trucks will be needed to deliver the same amount of cargo.
- Increased vehicle weight also significantly reduces range of travel - particularly in the winter months when cold weather and hazardous driving conditions are the norm and delivery of necessities like heating fuel and gasoline must continue, especially to our most vulnerable citizens.
- Who will service and repair these vehicles – particularly in the rural areas of Maine?

Before consideration is given to such a far-reaching proposal MEMA strongly encourages the Board to look no further than our own backyard for the solution to the challenge of meeting our carbon reduction goals.

Maine is living up to its motto and leading the way by developing “locally grown” fuels that offer what is arguably the best way forward for a carbon neutral future. In fact, biofuels are a key component of the “Maine Won’t Wait” climate action plan and have been cited by the Maine Climate Council’s Equity subcommittee as an opportunity to improve public health. The U. S. Department of Energy says that using biodiesel as a vehicle fuel increases energy security and improves air quality and the environment. Biodiesel is even endorsed by the American Lung Association as a proven way to reduce air pollutants.

Biodiesel is available now and its use reduces GHG emissions by as much as 70% in diesel trucks - **without requiring new infrastructure or truck equipment**. Also, new fuels like Ethyl

Levulinate developed in partnership with the University of Maine Forest Bioproducts Research Institute – Technology Research Center in Old Town, are carbon-negative, made from waste cellulose, can be used in our vehicles and heating systems, and will soon be manufactured in Lincoln, Maine.

MEMA and its members have worked to ensure that Mainers have the type of heating equipment and fuels to keep them warm *and* protect our environment. In home heating, highly efficient oil heat and propane boilers and furnaces and now the norm along with the use of low sulfur heating oil and renewable propane. With biofuels the same can be true for vehicles. The fact is, when given the choice, Mainers always choose what is right for themselves and the environment.

We should not adopt an unworkable scheme from the west coast. Instead, we should encourage all states, especially California, to follow our lead and embrace technologies developed in our state.

Thank you for your time and I will be happy to answer any questions that you may have.