



NRF DISTRIBUTORS[®]

FLOORING SOLUTIONS DELIVERED

August 23, 2023

Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333

Rulemaking Comments for Chapter 128, Advanced Clean Trucks program

On behalf of NRF Distributors Inc. I would like to offer the following comments on the proposed adoption of Chapter 128 rules.

NRF Distributors is a flooring Distributor that services customers in New England, New York, and Pennsylvania with a fleet of over 50 class 7/8 trucks. We are all for reducing greenhouse gases but are concerned that adopting this rule too soon will have a serious detrimental effect on our business, families, and customers.

The following are some of our concerns.

- The significant increased investment in ZEV and charging stations at our facility will have definite economic consequences for our business.
- The power grid and charging infrastructure is not even close to being ready for ZEV's.
- Our trucks will not be able to complete their daily routes without first having to stop to recharge (that's if they can find a charging station in their area) which will cause major financial loss to our company.
- We'll need to hire more drivers (which we can't find now) and purchase more trucks to make up for trucks stopped recharging.
- How well will the ZEV's work in our cold weather climate, we don't know. We're sure the truck's range will be significantly reduced in cold weather which will increase our financial losses even more.

We believe the Maine Bureau of Environmental Protection Board should not adopt the proposed Chapter 128 rules at this time because adopting this rule before having a solid plan for how the entire system will handle it is like putting the cart before the horse, it just won't work.

Sincerely,
NRF Distributors Inc.

Todd Kelley
Transportation Manager

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